

RECEIVED

FEB 24 2026

PUBLIC SERVICE  
COMMISSION

*Legal Counsel.*

DINSMORE & SHOHL LLP  
101 S. Fifth St., Suite 2500  
Louisville, KY 40202  
www.dinsmore.com

Edward T. Depp  
(502) 540-2347 (direct) · (502) 585-2207 (fax)  
tip.depp@dinsmore.com

Dinsm<sup>ô</sup>re

February 24, 2026

**Via Electronic Filing**

Linda C. Bridwell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40601

**Re: *Bernice Coyle Watson Tackett, Complainant v. Bluegrass Water Utility Operating Company, LLC, Defendant, Case No. 2025-00148***

Dear Executive Director Bridwell:

Enclosed for electronic filing in the above-captioned matter is Bluegrass Water Utility Operating Company, LLC's Responses to Commission Staff's Third Request for Information. The certificate of service below certifies that the enclosed was filed electronically today. The filing may be accessed at the Commission's Electronic Filing Center located at <http://psc.ky.gov/efs/efsmain.aspx>.

Thank you, and if you have any questions with respect to this matter, please call me.

Sincerely yours,

**DINSMORE & SHOHL LLP**

*/s/ Edward T. Depp*

Edward T. Depp

Executive Director Bridwell

February 24, 2026

Page 2 of 2

**Certification**

I hereby certify that a copy of this filing has been served electronically on the Kentucky Public Service Commission. Additionally, a true and accurate copy of the foregoing was mailed via certified mail, on February 24, 2026, to the following:

Bernice Coyle Watson Tackett  
2029 Longview Drive  
Georgetown, KY 40324

Charles Tackett  
134 Robinson Lane  
Georgetown, KY 40324

Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp  
*Counsel to Bluegrass Water Utility Operating  
Company, LLC*

ETD/hdt

Enclosures

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

<b>In the Matter of:</b>	)	
	)	
<b>BERNICE COYLE WATSON TACKETT</b>	)	
	)	
<b>COMPLAINANT</b>	)	
	)	<b>CASE NO. 2025-00148</b>
<b>v.</b>	)	
	)	
<b>BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC</b>	)	
	)	
<b>DEFENDANT</b>	)	

**BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC’S  
RESPONSES TO COMMISSION STAFF’S THIRD REQUEST FOR INFORMATION**

Bluegrass Water Utility Operating Company, LLC (“Bluegrass Water” or the “Company”), by counsel, files its responses to Commission Staff’s Third Request for Information, issued in the above-captioned case on February 6, 2026.

**FILED: February 24, 2026**

BERNICE COYLE WATSON TACKETT, COMPLAINANT  
v.  
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC, DEFENDANT  
CASE NO. 2025-00148

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE  
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

**REQUEST NO. 3-1:** Refer to Bluegrass Water's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1(d) in which Bluegrass Water stated in pertinent part as follows:

There was no video taken during the March 1, 2025 inspection; rather, this routine inspection consists of a visual inspection of the collection system to check for overflows, exposed piping, manhole conditions, and alarm status.

- a. State whether or not anything was used to visually inspect the interior of the pipe, such as a scope.
- b. If a sewer scope was used, explain why the root intrusions observed in the March 21, 2025 video were not observed on March 1, 2025 inspection.

**RESPONSE:** (a) Clearwater Solutions did not use a sewer scope, CCTV camera, or other device to visually inspect the interior of the pipe during the March 1, 2025 inspection. As explained in Bluegrass Water's response to Commission Staff's Second Request for Information, Item 2-1(d), the March 1, 2025 inspection consisted of a ground-level visual inspection of the collection system to check for overflows, exposed piping, manhole conditions, and alarm status, and no video was taken. Because the March 1, 2025, inspection did not include an internal camera inspection, root intrusions within the pipe that were later documented during the March 21, 2025, televised (CCTV) inspection could not be directly observed on March 1, 2025.

BERNICE COYLE WATSON TACKETT, COMPLAINANT  
v.  
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC, DEFENDANT  
CASE NO. 2025-00148

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE  
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

(b) No sewer scope was used during the March 1, 2025, inspection; therefore, interior pipe conditions, such as root intrusions, would not have been observable as part of that routine visual inspection.

**Witness: Todd Thomas, Sr. Vice President, Bluegrass Water Utility Operating Company**

BERNICE COYLE WATSON TACKETT, COMPLAINANT  
v.  
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC, DEFENDANT  
CASE NO. 2025-00148

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE  
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

**REQUEST NO. 3-2:** Refer to Bluegrass Water's response to Staff's Second Request Item

(1)(e) in which Bluegrass Water stated in pertinent part as follows:

**During the Collection System Preventative Maintenance Checklist conducted on March 1, 2025, Clearwater Solutions did not observe any abnormal conditions, including, but not limited to, any root intrusions.** For work orders such as the Collection System Preventative Maintenance Checklist, the Utility Cloud interface prompted operators to note whether the collection system "passed" or "failed" the inspection. Clearwater Solutions indicated that the collection system "passed" inspection on this date. See also "Exh. DR 2-1(b) Response – Utility Cloud WO – 3.1.25.xlsx." [**Emphasis added**]

- a. If a scope was not used, explain how Clearwater Solutions inspected for root intrusions.
- b. Confirm it is Bluegrass Water's position that the root intrusions observed in the March 21, 2025 video grew within the pipe within the 20 days following the March 1, 2025 inspection. Explain the response.

**RESPONSE:** (a) During the March 1, 2025, Collection System Preventative Maintenance Checklist, Clearwater Solutions inspected the collection system consistent with the routine visual inspection described in Commission Staff's Second Request, Item 2-1(d). That inspection consisted of walking the collection system to identify observable conditions such as overflows, exposed piping, ground-level evidence of blockages, manhole conditions, structural issues at manholes, and alarm status. In addition, flows at the facility were monitored and trended through

BERNICE COYLE WATSON TACKETT, COMPLAINANT  
v.  
BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC, DEFENDANT  
CASE NO. 2025-00148

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC'S RESPONSES TO THE  
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

the SCADA system to assess overall system performance. No sewer scope, CCTV camera, or other internal camera equipment was utilized during the March 1, 2025, inspection, and therefore no visual inspection of the interior of the pipe was performed. Clearwater Solutions did not observe any abnormal conditions that would suggest there was an internal issue within the affected sewer line. Thus, Clearwater Solutions indicated that the collection system “passed” the inspection. Root intrusions located within the interior of a closed pipe would not be observable absent a camera or other intrusive inspection method.

(b) Bluegrass Water does not contend that the root intrusions observed during the March 21, 2025, video grew within the 20 days after March 1, 2025. As previously stated, Bluegrass Water cannot conclusively determine the age of the root systems observed in the March 21, 2025, video and because the March 1, 2025, inspection was not an internal CCTV inspection, it was not designed to (and did not) provide a basis to confirm the presence or absence of root intrusion within the interior of the pipe.

The “pass” designation recorded during the March 1, 2025, Collection System Preventative Maintenance inspection reflected that no observable external deficiencies, overflows, alarm conditions, or structural issues were identified during the routine field inspection, and that system flows were operating within expected parameters based on SCADA monitoring and trending at that time.

**Witness: Todd Thomas, Sr. Vice President, Bluegrass Water Utility Operating Company**