

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-	)	
AMERICAN WATER COMPANY FOR AN	)	CASE NO.
ADJUSTMENT OF RATES, APPROVAL OF	)	2026-00094
SYSTEM IMPROVEMENT PROGRAM, AND	)	
TARIFF CHANGES	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO GEORGETOWN MUNICIPAL WATER AND SEWER SERVICE

Georgetown Municipal Water and Sewer Service (Georgetown Water and Sewer), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 10, 2026. The Commission directs Georgetown Water and Sewer to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Georgetown Water and Sewer shall make timely amendment to any prior response if Georgetown Water and Sewer obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Georgetown Water and Sewer fails or refuses to furnish all or part of the requested information, Georgetown Water and Sewer shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Georgetown Water and Sewer shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the August 7, 2026 Direct Testimony of Chase Azevedo (Azevedo Direct Testimony), page 6, lines 12-19, where Mr. Azevedo states that Kentucky-American Water Company (Kentucky-American) classifies the account for Georgetown

Water and Sewer's wastewater treatment plant at 900 Cherry Blossom Way as Sales for Resale even though the water delivered at that location is used on-site.

a. Confirm whether any water delivered to 900 Cherry Blossom Way is resold or distributed to retail customers. If not confirmed, explain the factual and tariff basis for Georgetown Water and Sewer's position that the account should be classified under Commercial Water Service rather than Sales for Resale.

b. Provide all invoices, account records, correspondence, and other documents concerning the account's classification and Georgetown Water and Sewer's request for correction.

c. State the current status of the request for correction and identify any refund, credit, or interest requested or received.

2. Refer to the Azevedo Direct Testimony, page 5, lines 1- 4; page 9, lines 1-16; and page 11, lines 11-16.

a. Provide, by month, the gallons purchased from Kentucky-American at the Champion Way interconnection (Champion Way) from January 1, 2021, through the most recent month available, and identify the operational reason for each month in which water was purchased.

b. Provide all contracts, emergency water-use agreements, interconnection agreements, amendments, extensions, renewal notices, and operating protocols that have governed or currently govern service through Champion Way.

c. Confirm whether the documents provided in response to Item 2(b) constitute all agreements that have governed or currently govern water service provided by Kentucky-American to Georgetown Water and Sewer through Champion Way. For

each agreement, identify the Commission case in which it was approved; state its original effective date and term; describe any automatic-renewal provisions; identify the date of its most recent renewal and its current expiration or renewal date; and state whether Georgetown Water and Sewer and Kentucky-American continue to operate under its terms. If the parties currently operate without an effective Commission-approved agreement, explain the basis under which the service is provided.

d. State whether Georgetown Water and Sewer considers the Champion Way service to be firm, continuing service, or standby or emergency service.

e. Explain the basis for the response in Item 2(d). Include in the response the tariff classification and rate treatment Georgetown Water and Sewer considers appropriate.

f. Provide all communications with Kentucky-American concerning that classification or rate treatment.

3. Refer to the Azevedo Direct Testimony, page 12, lines 1-9.

a. Describe all discussions and written communications between Georgetown Water and Sewer and Kentucky-American concerning long-term water supply for demand exceeding the 4.0 million gallons per day (MGD) capacity of the Royal Spring Water Treatment Plant. For each discussion or communication, identify the date and participants and describe the capacity or volume, required infrastructure, proposed rate or contract terms, and current status.

b. Provide the request for information, request for proposals, and all responses, proposals, and other nonprivileged supporting documents received from or provided to Kentucky-American that have not already been filed in this proceeding.

c. State whether Kentucky-American remains under consideration as a supplier and reconcile that response with Mr. Azevedo's statement in his Direct Testimony on page 14, lines 1-4 that Georgetown Water and Sewer cannot give serious consideration to Kentucky-American's tariffed rates.

4. Refer to the Azevedo Direct Testimony, page 3, lines 20-23, and pages 11-12.

a. State whether Georgetown Water and Sewer is considering expanding, replacing, or otherwise modifying the Royal Spring Water Treatment Plant to increase its capacity beyond 4.0 MGD within the next five years.

b. If so, describe the proposed project; anticipated capacity, schedule, and cost; funding sources; required approvals; status of engineering or planning studies; and expected effect on future purchased-water requirements.

c. If not, explain whether Georgetown Water and Sewer's long-term supply planning assumes that the plant will remain limited to 4.0 MGD.

5. Refer to the Azevedo Direct Testimony, page 9, lines 17-23; page 10, lines 3-14; and page 11, lines 6-12.

a. Reconcile Georgetown Water and Sewer's recorded usage of 51,409,317 gallons with the 51,413,900 gallons reflected on Kentucky-American's corrected bill.

b. State whether the June 15, 2026 corrected bill fully resolved all disputed billing and provide a schedule of all amounts billed, credited, and paid for Champion Way service during fiscal year 2026 (FY26), separately identifying usage charges, monthly service charges, taxes, and surcharges.

c. Identify the FY26 budgeted and actual amounts for Kentucky-American purchases and provide the calculation supporting the statement that expenditures equaled 137 percent of the budgeted amount.

6. Refer to the Azevedo Direct Testimony, page 11, lines 18-23, and page 12, lines 1-5.

a. Provide the 2022 Water Source Assessment and all workpapers supporting the projected average-day and maximum-day demands.

b. Identify the principal assumptions used in developing the projections and state whether the projections have been updated since 2022. If so, provide the updated projections and all supporting workpapers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

7. Refer to the Azevedo Direct Testimony, page 13, lines 10-12.

a. Explain the factual basis for Mr. Azevedo's statement that Kentucky-American incurs little fixed cost in serving Georgetown Water and Sewer at the Champion Way interconnection and that the service is incidental to Kentucky-American's end-use service.

b. Identify the Kentucky-American facilities, costs, studies, data, and other information considered in reaching that conclusion and provide all supporting analyses and workpapers.

8. Refer to the Azevedo Direct Testimony, page 12, lines 11-18, and page 13, lines 1-9.

a. Provide the calculations and assumptions supporting the approximately \$11.05 per 1,000 gallons hypothetical rate.

b. Explain the statement that the previously ordered rate of \$8.3091 was \$1.4825 more than Kentucky-American's proposed rate of \$6.9266 when the mathematical difference between those rates is \$1.3825 and provide any necessary correction to the testimony.


Justin McNeil
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED AUG 26 2026

cc: Parties of Record

Service List for Case 2026-00094

* Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Anne Trout
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

* Honorable David J. Barberie
Managing Attorney
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KY 40507

* Emily Bytnar
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

* Gabriel Thatcher
Attorney Senior
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KY 40507

* James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507

* John G Horne, II
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* JEB Pinney
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507

* Katherine Yunker
McBrayer PLLC
201 East Main Street
Suite 900
Lexington, KY 40507

* Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KY 40507-1801

* Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* J. Michael West
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Monica Braun
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KY 40507-1801

* Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

* Rebecca C. Price
Sturgill, Turner, Barker & Moloney
155 East Main Street
Lexington, KY 40507

* Stephen G Amato
McBrayer PLLC
201 East Main Street
Suite 900
Lexington, KY 40507

* Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601