

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

WANDA SUE CASTLE)
)
COMPLAINANT)
)
vs.) CASE NO. 2010-00406
)
)
KENTUCKY-AMERICAN WATER COMPANY)
)
RESPONDENT)

ANSWER

Now comes the Respondent, Kentucky-American Water Company (“KAW”), and for its Answer to the Complaint in this matter, makes the following admissions, denials, statements and defenses.

1. In response to the statements in Paragraph (a) of the Complaint, KAW admits that Wanda Sue Castle is a KAW customer located at 3761 Belleau Wood Drive, Lexington, Kentucky 40517.
2. In response to the statements in Paragraph (b) of the Complaint, KAW states that its physical business address is 2300 Richmond Road, Lexington, Kentucky 40502.
3. In response to the allegations in Paragraph (c) of the Complaint (spanning pages 1-3) describing Ms. Castle’s alleged daily activities, personal schedule, water use activities, persons using water at her residence, leak testing, her parents’ water bill and her beliefs as to the amount her water bill should be, KAW is without information sufficient to admit or deny those allegations, and, therefore, denies same.

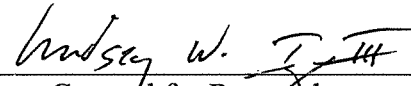
4. In response to the allegations in Paragraph (c) of the Complaint (spanning pages 1-3) describing her phone calls to KAW and her historical water usage and bills, KAW states that it has reviewed her water usage for every month since January 2009 and the usage is consistent and typical. Further pleading in respect to Ms. Castle's October 2010 bill totaling \$46.38, KAW states that, of the \$46.38 total, less than half of the bill (\$20.57 or 44.35%) is for KAW charges. The remainder of the bill is for: (a) Lexington-Fayette Urban County Government ("LFUCG") charge for sewer use (\$15.49); (b) LFUCG Water Quality Management Fee (\$4.32); (c) LFUCG landfill charge (\$4.50); (d) school tax (\$.62); (e) franchise fee (\$.62); and (e) Kentucky River Authority withdrawal fee (\$.26). Further pleading, KAW states that all meter readings on Ms. Castle's account since January 2009 have been actual readings except for February 2009 which was an estimated reading. KAW also states that the meter on the account was changed on July 14, 2009 and that the usage on the account has been consistent and typical both before and after the meter change.

5. KAW denies each and every allegation in the Complaint not specifically admitted to be true herein.

WHEREFORE, KAW requests that the Complaint be dismissed and all other relief to which it may be entitled.

Respectfully submitted,

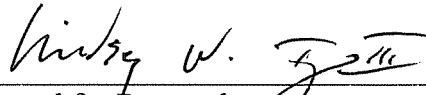
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By 
Counsel for Respondent

CERTIFICATE OF SERVICE

This is to certify that the original and 10 copies of the foregoing Answer have been filed on this 8th day of November, 2010 at the Public Service Commission and that a true and accurate copy of same has been served, via U.S. Mail, on the 8th day of November, 2010, upon the following:

Wanda Sue Castle
3761 Belleau Wood Drive
Lexington, Kentucky 40517



Counsel for Respondent

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