

Kentucky-American shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky-American fails or refuses to furnish all or part of the requested information, Kentucky-American shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied 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.

1. Provide billing statements or other documentation that reflects usage and charges for water service at 3649 Winding Wood Lane, Lexington, Kentucky, ("Complainants' residence") from May 4, 2013, through the current date.

2. Provide meter reading logs or other documentation that demonstrates the readings of the meter with the serial # 90537102 and the replacement meter located at the Complainants' residence from May 4, 2013, through the current date.

3. Provide copies of all letters, e-mails, and other written correspondence sent to and received from the Complainants that relate to the allegations of the Complaint.

4. State the notification procedures normally taken prior to removing a water meter for testing when there is a variance or deviation in a customer's water usage that is noted on the daily billing edit and/or billing exception report.

5. Refer to Exhibit A of the complaint, which the Complainants assert recaps the Complainants' invoices and water usage. State whether the Complainants were billed on January 8, 2014, for the billing period of November 6, 2013, through December 5, 2013, then billed on January 13, 2014, for the billing period of December 6, 2013, through January 7, 2014.

a. If the answer is in the affirmative, explain the delay in billing the Complainants for the billing period of November 6, 2013, through December 5, 2013.

b. If the answer is in the negative, state the date the bill was generated and mailed to the Complainants for the billing period of November 6, 2013, through December 5, 2013.

6. Pursuant to administrative regulation 807 KAR 5:006 §11(3) and Kentucky-American Tariff Rule 20(K), Kentucky-American is to monitor each customer's water usage for unusual deviations in usage. State whether the water usage at Complainants' residence for the billing period of November 6, 2013, through December 5, 2013, was noted on Kentucky-American's daily billing edit and/or included in the billing exception report.

a. If the answer is in the affirmative, state whether the meter was re-read before the account was billed.

b. If the answer is in the affirmative, state what steps Kentucky-American took to investigate the water usage at the Complainant's residence.

c. If the answer is in the affirmative, provide copies of all documents related to any investigation of water usage at Complainants' residence.

d. If the answer is in the negative, explain why the water usage did not trigger notice on the daily billing edit and/or billing exception report.

7. State whether the water usage at Complainants' residence for the billing period of December 6, 2013, through January 7, 2014, was noted on Kentucky-American's daily billing edit and/or included in the billing exception report.

a. If the answer is in the affirmative, state whether the meter was re-read before the account was billed.

b. If the answer is in the affirmative, state what steps Kentucky-American took to investigate the water usage at the Complainant's residence and state the results of said investigation.

c. If the answer is in the affirmative, provide copies of all documents related to any investigation of water usage at Complainants' residence.

d. If the answer is in the negative, explain why the water usage did not trigger notice on the daily billing edit and/or billing exception report.

8. If Kentucky-American investigated the water usage at the Complainant's residence for the billing periods in question, state whether the Complainants were contacted as part of the investigation.


a. If the answer is the in affirmative, identify the date(s) and content of all verbal and written communication with the Complainants related to the investigation.

9. Refer to Paragraph 6 of the Answer. State whether the Complainants were notified that the water meter at their residence would be tested prior to the water meter's removal for testing.

a. If the answer is in the affirmative, state whether the Complainants were given the opportunity to attend the meter testing.

b. If the Complainants were not given the opportunity to attend the meter testing, explain why not.

10. Provide a copy of the results for the meter testing conducted by Kentucky-American on the meter removed from the Complainants' residence which are referenced in Paragraph 6 of the Answer.



Jeff Derouen
Executive Director
Public Service Commission
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DATED MAY 28 2014

cc: Parties of Record

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