

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

EARL D. ISON, JR AND BRENDA C. ISON)	
)	
COMPLAINANTS)	
)	
V.)	CASE NO.
)	2019-00093
)	
KENTUCKY-AMERICAN WATER COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO KENTUCKY-AMERICAN WATER COMPANY

Kentucky-American Water Company (Kentucky-American), pursuant to 807 KAR 5:001, is to file with the Commission the original and three copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within five days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response 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 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.

Kentucky-American shall make timely amendment to any prior response if Kentucky-American 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 shall 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky-American 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 Kentucky-American's response to Complainants' Complaint (Response) in which Kentucky-American attached a Meter Test Form that indicates that the meter removed from the Ison's property had the required accuracy to pass the test.
 - a. Explain in full detail why the meter was scrapped if it passed the meter test.
 - b. Explain why the glass on the meter was cracked.
 - c. Explain what an RF device is, and why it was removed.
 - d. Explain why a data log was not possible.

2. Refer to Kentucky-American's Response in which Kentucky-American attached a Meter Information Form and placed a check mark next to "False Reading." Explain in full detail why this was marked if the water meter passed the meter test.

3. Refer to 807 KAR 5:006, Section 7(5)(a), in which it states that each utility, except if prevented by reasons beyond its control, shall read customer meters at least quarterly. Explain whether Kentucky-American complied with this regulation in regard to the Ison's meter, and if not, explain why not.

4. Refer to 807 KAR 5:006, Section 7(5)(d), in which it states that if a utility is unable to read a meter then the utility shall record the date and time the attempt was made and the reason the utility was unable to read the meter. Explain whether Kentucky-American complied with this regulation, and provide all records regarding the same.



Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
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DATED FEB 07 2020

cc: Parties of Record

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