

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|------------------------------------|---|------------|
| JTB REAL ESTATE LLC D/B/A TARLETON |) | |
| CROSSING APARTMENTS |) | |
| |) | |
| COMPLAINANT |) | |
| |) | CASE NO. |
| V. |) | 2009-00483 |
| |) | |
| KENTUCKY-AMERICAN WATER COMPANY |) | |
| |) | |
| DEFENDANT |) | |

INFORMATION REQUEST OF COMMISSION
STAFF 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 five copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of issuance. Responses to requests for information 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 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, it 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Provide billing statements or other documentation that reflects usage and charges for account 522872 since January 1, 2006.
2. Provide billing statements or other documentation that reflects usage and charges for account 522874 since January 1, 2006.
3. Refer to paragraph 2 of the Answer.
 - a. Identify when and under what circumstances the leak at the outlet side coupling was discovered.
 - b. Provide a diagram that depicts the meter box, meter, couplings, and service line, and identify the specific location of the steel coupling that had deteriorated.
4. State whether the credit identified in paragraph 3 of the Answer was directly related to the leak discussed in paragraph 2 of the Answer.

5. Identify the six-month period that was used to calculate the credit calculation discussed in paragraph 3 of the Answer and explain why a six-month average was used.

6. Provide all letters, e-mail messages, or other correspondence in which Kentucky-American discussed the credits identified in paragraph 3 of the response.

7. Reconcile the differences between the credit of \$634.45 for 112 CCF of water, which is discussed in paragraph 3 of the Answer, and the credit of \$453.64 for 63,000 gallons of water, which is discussed in paragraph 3 of the Complaint.

8. Provide the meter test results identified in paragraph 4 of the Answer. If not stated in the test results, identify the type of meter, size of meter, and test criteria.

9. Explain the conditions that existed on August 27, 2009 at the meter for account 522872 when the Kentucky-American supervisor determined that a leak was coming from the service line. Provide a diagram to show the location of the leak.

10. Provide meter test results of September 1, 2009 for the meter on account 522874. If not stated in the test results, identify the type of meter, size of meter, and test criteria.

11. a. Identify the date on which the meter for account 522874 that was tested on September 1, 2009 was placed back into service.

b. Provide meter reading logs or other documentation that demonstrates the readings of the meter and replacement meter for account 522874 from August 2009 through October 2009.

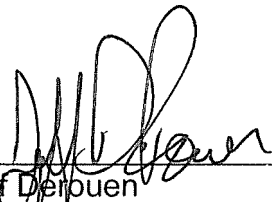
12. Provide all work orders, logs, notes, diagrams, or other documentation that support Kentucky-American's position that it did not cause damage when replacing the meter for account 522874 in September 2009.

13. Identify the 12-month period that was used to calculate the credit calculation discussed in paragraph 8 of the Answer

14. Explain how the sewer credit was calculated in paragraph 8 of the Answer. Specifically, explain why the 75-percent factor was used, and what usage number was reduced by 75 percent to calculate 237 CCF.

15. Provide all letters, e-mail messages, or other correspondence in which Kentucky-American discussed the credits identified in paragraph 8 of the response.

16. State whether the manual-read meters that were replaced by radio-read meters for accounts 522872 and 522874 were tested after being removed on January 17, 2008, and May 14, 2009, respectively. If either was tested, provide those test results. If not stated in the test results, identify the type of meter, size of meter, and test criteria.



Jeff Derouen
Executive Director
Public Service Commission
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DATED: APR - 8 2010

cc: Parties of Record

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