

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.

Bent Tree 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 Bent Tree fails or refuses to furnish all or part of the requested information, Bent Tree 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, Bent Tree 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 Bent Tree's response to Commission Staff's First Request for Information (Staff's First Request), Item 1.

a. Explain in full detail whether Bent Tree is requesting for the Commission to have the old meters that were removed from the Bent Tree property, and currently held by Kentucky-American Water Company (Kentucky-American), tested by an independent third party.

b. If Bent Tree does want the old meters tested by an independent third party, advise whether Bent Tree wants to be present at the testing, if possible.

c. If there are any fees associated with an independent third party testing the old meters, explain whether Bent Tree will agree to pay for the same.

2. Refer to Bent Tree's formal Complaint, page 5, in which it states that on or about May 25, 2018, Bent Tree engaged the services of American Leak Detection to look for a leak at the Redding Road meter's location, but no leak was found. Also, refer to Bent Tree's response to Staff's First Request, Item 2, pages 17 and 40, which provides a graph and a chart indicating a drastic reduction of water consumption on or about the same date that American Leak Detection looked for leaks at the subject property.

a. Provide all documentation between Bent Tree and American Leak Detection.

b. Explain in full detail what American Leak Detection discovered in its leak investigation.

c. Explain in full detail how there was a large reduction in water consumption on or about the same date that American Leak Detection investigated Bent Tree's property for leaks.



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cc: Parties of Record

Case No. 2019-00133

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