

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LOWELL DEWAYNE SHEPHERD)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2019-00259
)	
KENTUCKY-AMERICAN WATER COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S SECOND 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 an electronic version of the following information. The information requested herein is due within 14 days of the entry of this request for information. The Commission directs Kentucky-American to the Commission's March 16, 2020 Order in Case No. 2020-00085¹ regarding the filing of physical documents with the Commission. The Commission expects that original documents will be filed with the Commission within 30 days of the lifting of the current state of emergency.²

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020).

² Any electronic email filed in this matter should be sent to PSCED@ky.gov, and each message should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 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 Answer and Motion to Dismiss, Tab 2. The bill issued by Kentucky-American to Mr. Lowell DeWayne Shepherd (Mr. Shepherd) with a payment due by March 29, 2019, states that on February 27, 2019, the meter serving his property was removed and replaced with a new meter.

a. Explain in full detail whether Mr. Shepherd requested that the meter to be replaced, or whether Kentucky-American replaced the meter on its own accord.

b. Provide a detailed explanation of the technical capabilities of Mr. Shepherd's new meter that was installed on February 27, 2019. Be sure to explain whether the new meter is capable of capturing exact monthly water usage.

c. Provide a detailed explanation of the technical capabilities of Mr. Shepherd's old meter that was replaced on February 27, 2019. Be sure to explain whether the old meter was capable of capturing exact monthly water usage.

d. State whether Kentucky-American was ever notified of a leak at Mr. Shepherd's premises.

2. Refer to Kentucky-American's Answer and Motion to Dismiss, Tab 2. The bill issued by Kentucky-American to Mr. Shepherd with a payment due by February 4, 2019, states that there was an estimated read of the meter for the service period of December 12, 2018, through January 13, 2019. Refer also to 807 KAR 5:006, Section 7(5)(d), which states that if, due to reasons beyond its control, a utility is unable to read a meter in accordance with this subsection, the utility shall record the date and time the attempt was made, if applicable, and the reason the utility was unable to read the meter.

a. Explain in full detail why Kentucky-American did not perform an actual read of Mr. Shepherd's meter for the bill issued with a payment due by February 4, 2019.

b. Explain whether the estimated read of the meter for the bill with a payment due by February 4, 2019, could have impacted the next bill, which was the increased bill with a payment due by March 4, 2019.

c. As referenced above, provide the information as required by 807 KAR 5:006, Section 7(5)(d).

3. In Kentucky-American's current tariff, monthly consumption charges for all customers are measured in gallons. Explain whether Kentucky-American intends to replace meters that measure usage in cubic feet with newer meters that measure in gallons.

4. Explain whether Kentucky-American has offered a payment plan to Mr. Shepherd and provide the specific details of the same.



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Public Service Commission
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DATED MAR 23 2020

cc: Parties of Record

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