

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-)	
AMERICAN WATER COMPANY FOR A)	CASE NO.
BALANCING ADJUSTMENT FOR ITS QIP)	2021-00376
CHARGE)	

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

Kentucky-American 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 is due on December 7, 2021. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 that indicates 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. Regarding the State Street Phase I and II projects, explain why additional feet of main installation were necessary and what relationship that had to the explanation in the Application, Exhibit 2, in which it stated that the variance between actual and projects costs was due to valve that broke during construction.

2. Regarding the State Street Phase I and II projects, explain what Kentucky-American meant that the existing valves that were replaced during the two phases were inoperable and explain why the valves were inoperable.

3. Regarding Versailles Road 1, explain why paving and restoration extents were greater than planned and why more fire hydrants were replaced than the initial design.

4. Regarding the Versailles Road II projects, when the final paving and restoration work is completed, does Kentucky-American expect that actual projects costs will be less than projected?

5. Regarding the Castlewood Phase I and II projects, describe how often Kentucky-American finds unmarked and unplanned for storm and sanitary lines and what steps have been taken to address the issue.

6. Regarding the Winchester Road project, explain why the erosion control expense was higher than projected, resulting in a contractor labor overage.

7. Regarding the C line project, confirm that Kentucky-American experienced a greater number of actual main breaks, which increased the project cost.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED NOV 22 2021

cc: Parties of Record

*John Dillon
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Tricia Sinopole
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502