

**KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2008-00427
ATTORNEY GENERAL'S FIRST REQUEST FOR INFORMATION**

Witness: Michael A. Miller

187. Please provide the Request for Proposal, the proposal, any and all work papers, interview notes, data requests, data submissions, budget vs. actual and variance reports, FERC Form 60 Reports, and all other documents reviewed in connection with the preparation (whether used or not) of any of the management audits provided above.

Response:

Please see the response to AGDR1#186 for final copies of the management audits. The Company objects to this request on the grounds that the production of the information is not relevant to this proceeding, is overly broad and unduly burdensome due to the volume of information (tens of thousands of pages of information), and is not in the possession or control of the Company.

For the electronic version, refer to KAW_R_AGDR1#187_122308.pdf.

**KENTUCKY-AMERICAN WATER COMPANY
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ATTORNEY GENERAL'S FIRST REQUEST FOR INFORMATION**

Witness: Michael A. Miller

188. Please provide all documents constituting, referencing, containing, relating to, responding to, or referring to findings and recommendations to KAWC, AWWSC, or any other KAWC parent or affiliate, or to any other person or entity resulting from or related to the management audits provided above.

Response:

Please see the response to AGDR1#186 for final copies of the management audits. The Company objects to this request on the grounds that the production of the information is not relevant to this proceeding, is overly broad and unduly burdensome due to the volume of information, and is not in the possession or control of the Company.

For the electronic version, refer to KAW_R_AGDR1#188_122308.pdf.

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Witness: Michael A. Miller

189. If not provided elsewhere, please provide all documents constituting, referencing, containing, relating to, responding to, or referring to any bench-marking studies or similar reports, performed by outside consulting or benchmarking firms (for example, but not limited to: Gartner, Ernst & Young, Towers-Perrin, Hackett, Saratoga, and industry or functional associations), whether in draft or final form, with all associated documentation, including, but not limited to definitions, instructions, data inputs, and supplementary reports that have been initiated or completed for KAWC, AWWSC and/or any KAWC parent or affiliate since January I, 1997. The requested documents include, without limitation, all documents constituting, referencing, containing, relating to, responding to, or referring to internal analyses of these reports, including, without limitation, remediation plans, schedules and progress reports associated with follow-up for this work.

Response:

This request seeks confidential information for which the Company will seek confidential protection. The Company will provide it to those who execute a confidentiality agreement. For the electronic version of the confidential documents, refer to:

KAW_R_AGDR1#189_Part1_CONFIDENTIAL_122308.pdf
KAW_R_AGDR1#189_Part2_CONFIDENTIAL_122308.pdf

For the electronic version of this document, refer to
KAW_R_AGDR1#189_122308.pdf.

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190. Please provide a schedule identifying for each of calendar years 2004 through 2008 (a) each operating company, affiliate, and/or parent Company to which AWWSC provided services of any kind during that time; (b) the total amount paid by each such company to AWWSC each year and (c) the average number of end-user customers for each identified company for each calendar year.

Response:

AWWCo Management Fees

Company Name	Yr to Date December 2008	12 Month December 2007	12 Month December 2006	12 Month December 2005	12 Month December 2004
American Water Works Company	2,398,262	2,737,122	2,593,881	11,268,198	(7,058,124)
California-American Water Co.	11,495,434	13,474,583	12,684,501	10,992,827	10,766,933
Illinois-American Water Co.	18,608,261	20,103,475	17,971,678	15,452,530	12,594,708
Indiana-American Water Co.	18,272,019	18,505,408	16,518,779	9,456,954	14,020,039
Iowa-American Water Company	3,555,972	3,949,635	3,451,707	3,006,088	2,670,034
Kentucky-American Water Co.	7,257,930	7,516,223	6,612,414	5,912,684	6,135,981
Maryland-American Water Co.	389,864	449,304	341,853	341,248	241,860
Michigan-American Water Co.	189,932	198,600	219,789	163,750	161,111
Missouri-American Water Co.	27,177,254	29,083,244	26,670,532	23,204,090	15,140,858
New Jersey-American Water Co.	35,015,870	38,145,660	37,064,749	32,598,250	19,844,891
New Mexico-American Water Co.	1,256,469	1,316,827	1,201,402	1,015,700	929,708
American Water Resources, Inc	171,908	584,696	478,221	484,655	437,466
Ohio-American Water Co.	3,626,139	3,915,007	3,706,151	3,162,618	2,124,302
Arizona-American Water Co.	10,685,342	11,978,348	10,465,160	8,286,010	6,598,116
Pennsylvania-American Water Co	36,782,002	40,612,137	36,172,852	32,456,502	29,538,483
Tennessee-American Water Co.	4,632,093	4,725,529	4,312,528	3,752,617	4,012,316
Virginia-American Water Co.	3,794,056	3,658,307	3,271,743	3,069,785	2,899,287
West Virginia-American Water	10,083,167	10,910,520	9,809,249	8,788,473	9,600,555
Hawaii-American Water Co.	773,042	718,766	733,473	671,124	679,102
Long Island Water Company	4,023,755	4,639,852	4,089,729	3,378,047	3,795,764
Virginia American Eastern Dist	139,204	130,053	144,201	114,718	62,262
Illinois Lake Water Company	-	-	-	-	432,976
Texas American Water Company	363,567	474,241	470,350	269,909	192,068
E'town Corporation	-	-	125,548	1,822,288	-
Edison Water Co.	316,036	216,928	113,434	8,114	-
Liberty Water Co.	484,942	350,253	207,318	3,199	-
Etown Services LLC	48,641	62,948	46,758	386	-
Etown Properties Inc	2,092	33,412	-	-	-
Laurel Oak Properties, Inc	-	-	-	5,899	-
Thames Water Holding, Inc.	-	-	-	(323,199)	488,115
Thames Water North America	-	-	-	19,638	(99,913)

COMPANY NAME	Water Customer Totals as of				
	11/30/2008	12/31/2007	12/29/2006	12/9/2005	12/10/2004
CALIFORNIA-AMERICAN	172,663	169,196	174,680	169,414	170,249
ILLINOIS-AMERICAN	308,123	284,593	282,121	274,837	269,016
INDIANA-AMERICAN	282,660	282,632	280,666	279,863	276,153
IOWA-AMERICAN	60,770	60,403	59,986	59,438	59,002
KENTUCKY-AMERICAN	118,382	117,088	115,820	112,235	110,707
MARYLAND-AMERICAN	4,865	4,833	4,778	4,772	4,766
MICHIGAN-AMERICAN	3,765	3,891	3,741	3,062	3,820
MISSOURI-AMERICAN	457,426	463,999	463,351	458,564	454,406
NEW JERSEY-AMERICAN	638,718	606,572	370,608	374,865	361,498
NEW MEXICO-AMERICAN	16,933	16,774	16,556	16,372	16,145
OHIO-AMERICAN	57,451	51,000	51,209	51,265	51,462
ARIZONA-AMERICAN	154,004	102,683	100,637	93,791	86,175
PENNSYLVANIA-AMERICAN	651,149	630,132	626,891	618,998	614,268
TENNESSEE-AMERICAN	74,896	74,540	73,701	72,660	72,013
VIRGINIA-AMERICAN	54,442	54,253	54,551	54,233	53,642
WEST VIRGINIA-AMERICAN	170,823	167,909	166,477	165,801	165,857
HAWAII-AMERICAN	9,271	-	-	-	-
LONG ISLAND-AMERICAN	73,947	73,873	73,495	73,500	73,754
UNITED WATER VIRGINIA	2,589	2,535	2,422	2,316	2,209
TEXAS-AMERICAN	5,209	4,026	4,088	4,067	4,096
ELIZABETHTOWN WATER Co *		-	208,731	206,850	203,130
Mt HOLLY WATER Co *		-	16,415	16,135	15,185
Total	3,318,086	3,170,932	3,150,924	3,113,038	3,067,553

* Elizabethtown Water & Mt Holly Water merged w/NJAW

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191. In Tennessee American Water Company's recent rate case, TRA Docket No. 08-00039, the TRA Director moved to "order the Company to develop a Request for Proposal for a comprehensive management audit by an independent CPA" which was to include an investigation of AWWC's management performance and decisions relating to internal processes and internal controls. (Director Roberson's Motion, p. 2) Please provide an update on the status of that RFP. If a draft has been completed, please provide a copy.

Response:

The Company objects to this request on the grounds that it is not relevant to this proceeding. The TRA has not confirmed its verbal motion with a final written order, and Tennessee American Water is waiting on that final written order to determine the Authority's direction prior to developing the RFP, and to assess further actions available to Tennessee American Water. Notwithstanding the objection, the RFP has not been generated.

For the electronic version, refer to KAW_R_AGDR1#191_122308.pdf.