

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ADJUSTMENT OF RATES OF KENTUCKY-) CASE NO.
AMERICAN WATER COMPANY) 2010-00036

INITIAL REQUEST FOR INFORMATION ON BEHALF OF CAC

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Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and submits the following Initial Request for Information to Kentucky American Water Company:

1. How many Kentucky American Water Company residential accounts were shut off for non-payment in each year 2005, 2006, 2007, 2008 and 2009? Where possible, provide this information broken down by county, zip code and census tract. Also, please provide an electronic copy of this information in spreadsheet format such as Microsoft Excel.
2. How many Kentucky American Water Company residential accounts were paid late at least once in each year 2005, 2006, 2007, 2008 and 2009? Where possible, provide this information broken down by county, zip code and census tract. Also, please provide an electronic copy of this information in spreadsheet format such as Microsoft Excel.
3. How many Kentucky American Water Company residential accounts were shut off for non-payment in the time period 1/1/2010 through the latest date in 2010 where records are available? Where possible, provide this information broken down by

- county, zip code and census tract. Also, please provide an electronic copy of this information in spreadsheet format such as Microsoft Excel.
4. How many Kentucky American Water Company residential accounts were paid late at least once in the time period 1/1/2010 through the latest date in 2010 where records are available? Where possible, provide this information broken down by county, zip code and census tract. Also, please provide an electronic copy of this information in spreadsheet format such as Microsoft Excel.
 5. How many Kentucky American Water Company residential accounts received benefits through the “Help To Others” program in each year 2006, 2007, 2008, 2009, and through the latest date in 2010 where records are available?
 6. What is the total amount of funding Kentucky American Water Company has contributed in each year 2006, 2007, 2008, 2009, and 2010 to programs that directly assist its customers who have difficulty paying their bills?
 7. How much have Kentucky American Water Company ratepayers, through voluntary donations, contributed to the “Help To Others” program in each year 2006, 2007, 2008, 2009, and 2010?
 8. How many Kentucky American Water Company ratepayers, through voluntary donations given through billing statements, contributed to the “Help To Others” program through the latest date in 2010 where records are available?
 9. Please provide a list of Kentucky counties in which Kentucky American Water Company provides service and the number of residential customers in each of those counties. Also, please provide a break down of the number of Kentucky American Water residential customers by zip code and census tract. Please provide an electronic copy of this information in spreadsheet format such as Microsoft Excel.

10. What is the current, average, total monthly cost and usage for all residential customers of Kentucky American Water Company? Where possible, provide this response broken down by county.
11. Based on the requested residential rate increase, what will be the real dollar annual increase for the average residential customer?
12. Assuming approval of the requested residential rate increase, what will be the estimated average, total monthly cost for residential customers?
13. Given that the proposed increase in rates will make the cost of water less affordable for many residential customers, does Kentucky American Water Company have a plan to prevent increases in its shutoff rates and the amount of arrearages owed by its residential customers?
14. Has Kentucky American Water Company explored/considered offering lifeline rates, low-income rates or other forms of making water more affordable for those whose income is not sufficient to pay for all essential services? If yes, what did the company conclude and what was the rationale for its conclusion? If no, why not?
15. Please provide the number of residential customers who made late payments in each of the 12 months preceding the most recent increase in 2009 of Kentucky American Water Company's residential rates. Provide the number of residential customers who made late payments in each of the 12 months following that change.

Respectfully submitted,



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COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that CAC's April 8, 2010 electronic filing is a true and accurate copy of the Initial Request for Information on Behalf of CAC to be filed in paper medium; and that on April 8, 2010 the electronic filing has been transmitted to the Commission, an original and one copy of the filing will be delivered to the Commission, and electronic mail notification of the electronic filing is provided to the following:

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