

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:)
)
THE APPLICATION OF KENTUCKY-AMERICAN) CASE NO. 2012-00520
WATER COMPANY FOR AN ADJUSTMENT OF)
RATES ON AND AFTER JANUARY 27, 2013)

KENTUCKY-AMERICAN WATER COMPANY'S
DATA REQUESTS TO CAC

In accordance with the Public Service Commission's ("Commission") January 22, 2013 Order, Kentucky-American Water Company ("KAW") propounds the following data requests upon the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties ("CAC"). CAC shall respond to these requests in accordance with the provisions of the Commission's January 22, 2013 Order and the instructions set forth below.

INSTRUCTIONS

1. In producing documents and things responsive to these requests, CAC ("you") shall respond in accordance with the requirements set forth in the Commission's January 22, 2013 Order and the production shall be organized and labeled to correspond with the data requests to which they are responsive, regardless of whether these documents and things are possessed directly by you or by your present or past agents, employees, companies, licensees, representatives, investigators, or attorneys.

2. If the attorney-client privilege or work product immunity is asserted as to any document or thing, or if any document or thing is not produced in full, produce the document or thing to the extent the request for production is not objected to, and, in so doing, state the following:

- (a) the specific ground(s) for not producing the document or thing in full;
- (b) the basis for such a claim of privilege or immunity and the facts supporting that basis; and
- (c) fully identify the information or material contained within the document or thing for which such privilege or immunity is asserted, including as applicable, the name of any document or thing; its date; the name, address and job title of each author or other person involved in its preparation, each addressee and each person to whom a copy of the document or thing has been sent or received; and the general nature of the document or thing (e.g., memoranda, letter).

3. Where an objection is made to a request, state all grounds upon which your objection is based.

4. If, after exercising due diligence, you are unable to determine the existence of any documents or things falling within a specific request, you shall so state in your written response.

5. With respect to each of the following requests, you shall identify and/or produce all documents which are known to you or which can be located or discovered by you through diligent effort on your part, including, but not limited to, all documents which are in your business, personnel, and/or personal files or those of your present or past employees or contained or stored within a computer in your possession or those of your present or past representatives, attorneys, or accountants, or accessible to you or your present and past employees, or its representatives, attorneys, or accountants.

6. Whenever used herein, the singular shall be deemed to include the plural and the plural shall be deemed to include the singular and the disjunctive shall be deemed to include the

conjunctive and the conjunctive shall be deemed to include the disjunctive so as to elicit all information potentially responsive to the request for production.

REQUESTS

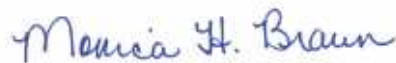
1. Please identify each and every meeting anyone affiliated with CAC attended with KAW's representatives following Case No. 2010-00036. For each meeting identified:
 - (a) List every person that attended; and
 - (b) Produce a copy of any notes anyone affiliated with CAC took during the meeting.
2. Please explain CAC's understanding of why the proposed legislation that CAC, KAW, and the Attorney General collaborated to draft in 2011 that would have allowed water utilities to grant a reduced rate service to certain low-income residential customers was not introduced in Kentucky's General Assembly.
3. Please explain CAC's position on whether the drafted legislation should be introduced in the Kentucky General Assembly.
4. Please explain CAC's understanding of KAW's and the Attorney General's respective positions on whether the drafted legislation should be introduced in the Kentucky General Assembly.
5. Please produce any empirical evidence performed by or on behalf of CAC that demonstrates that a graduated or tiered rate structure benefits low-income residential customers more than a reduced rate service.
6. Please produce any empirical evidence that anyone affiliated with CAC is aware of that demonstrates that a graduated or tiered rate structure benefits low-income residential customers more than a reduced rate service.
7. Please explain fully how CAC promotes the H2O program.
8. Please provide the funding sources and amount of funding CAC received from 2010-2012 and expects to receive in 2013, for the Columbia Gas of Kentucky energy subsidy program referred to on p. 6 of Jack Burch's pre-filed testimony.
 - (a) If CAC receives funding from more than one source, identify the amount each source provides.

9. Please provide the funding sources and amount of funding CAC received from 2010-2012 and expects to receive in 2013, for the WinterCare Energy Fund referred to on p. 5 of Jack Burch's pre-filed testimony.
 - (a) If CAC receives funding from more than one source, identify the amount each source provides.
10. Please provide the funding sources and amount of funding CAC received from 2010-2012 and expects to receive in 2013, for the LIHEAP program referred to on p. 5-6 of Jack Burch's pre-filed testimony.
 - (a) If CAC receives funding from more than one source, identify the amount each source provides.
11. Please provide the funding sources and amount of funding CAC received from 2010-2012 and expects to receive in 2013, for the Kentucky Utilities Home Energy Assistance program referred to on p. 6 of Jack Burch's pre-filed testimony.
 - (a) If CAC receives funding from more than one source, identify the amount each source provides.
12. Please provide the funding sources and amount of funding CAC received from 2010-2012 and expects to receive in 2013, for the Summer Cooling program referred to on p. 6 of Jack Burch's pre-filed testimony.
 - (a) If CAC receives funding from more than one source, identify the amount each source provides.
13. Please produce any empirical and/or statistical evidence anyone affiliated with CAC is aware of regarding the household size of low-income customers.

Dated: April 17, 2013

Respectfully submitted,

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BY: _____

Attorneys for Kentucky-American Water Company

CERTIFICATE

In accordance with Ordering Paragraph No. 10 of the Commission's December 17, 2012 Order, this is to certify that Kentucky-American Water Company's April 17, 2013 electronic filing is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on April 17, 2013; that an original and one copy of the filing will be delivered to the Commission on April 17, 2013; and that no party has been excused from participation by electronic means.

STOLL KEENON OGDEN PLLC

By *Marcia H. Braun*

Attorneys for Kentucky-American Water Company