

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:)
)
APPLICATION OF KENTUCKY-AMERICAN)
WATER COMPANY FOR AN ADJUSTMENT) **CASE NO. 2015-00418**
OF RATES)
)

OBJECTION TO ATTORNEY GENERAL’S
SECOND REQUEST FOR INFORMATION

In accordance with the deadline set forth in the Commission’s February 22, 2016 Order, Kentucky-American Water Company (“KAWC”), by counsel, submits this objection to Item Nos. 2, 18 and 19 of the Office of the Attorney General’s (“AG”) Second Request for Information.

Item No. 2 asks KAWC to provide information comparing KAWC’s current and proposed rates to state and national average rates. To the extent any such comparison can be performed validly, the request asks KAWC to perform original work that has not been performed and that can just as easily be performed by the AG. Additionally, the request seeks irrelevant information. Therefore, KAWC objects to Item No. 2.

Item Nos. 18 and 19 ask KAWC to provide updated information for Schedules B and C to Exhibit 37 to KAWC’s January 29, 2016 Application. This is the same type of updated information KAWC is required by statute to provide “no later than forty-five (45) days after the last day of the base period.”¹ That statute requires KAWC to provide the actual results for the months of the base period that were estimated (November 2015 – April 2016) when KAWC filed its Application. The last day of the base period in this case is April 30, 2016 so the updated

¹ KRS 278.192(2)(b).

actual result information must be filed no later than June 14, 2016. Therefore, KAWC objects to these requests on the basis that the timing of providing this information is already governed by statute. To the extent KAWC closes its books for March 2016 and can provide this information prior to June 14, 2016, it will do so.

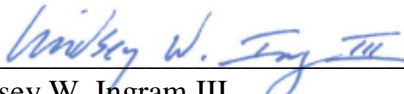
Date: April 19, 2016

Respectfully submitted,

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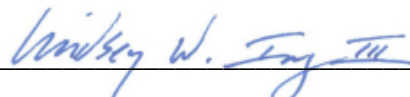
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CERTIFICATE

This certifies that Kentucky-American Water Company's 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 19, 2016; that a paper copy of the filing will be delivered to the Commission within two business days of the electronic filing; and that no party has been excused from participation by electronic means.

STOLL KEENON OGDEN PLLC

By: 

Attorneys for Kentucky-American Water Company