

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY-AMERICAN  
WATER COMPANY FOR AN ADJUSTMENT OF  
RATES

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)  
)

CASE NO. 2015-00418

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S FIRST REQUESTS FOR INFORMATION  
TO THE KENTUCKY-AMERICAN WATER COMPANY**

Comes now the Lexington-Fayette Urban County Government ("LFUCG" or "Lexington"), by counsel and pursuant to the Public Service Commission's Scheduling Order of February 22, 2016 and submits its First Requests for Information to the Kentucky-American Water Company ("KAWC") to be answered as follows:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

WHEREFORE, the Lexington-Fayette Urban County Government submits this First Requests for Information.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN  
COUNTY GOVERNMENT  
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**FILING NOTICE AND CERTIFICATE**

I hereby certify that the foregoing is a true and accurate copy of the document(s) to be filed in paper medium with the Public Service Commission (which include a cover letter serving as the required Read1st document); that the electronic submission of these documents to the Commission was performed on March 3, 2016; that copies of these documents were mailed via first class U.S. Mail, postage prepaid, to the Kentucky Public Service Commission on March 3, 2016; and that there are currently no parties that have been excused from participation by electronic service.

BY:

  
Andrea C. Brown, Esq.

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S  
REQUESTS FOR INFORMATION**

1. Please provide the total number of water service meters assigned to Lexington as a customer in the base period and in the forecasted test period, and the total revenue requirement assigned to Lexington as a customer in the base period and the forecasted test period.

2. Under how many different types of customer rate classes does Lexington currently make payments to KAWC? For each type of class, please provide the following information:

- (a) The type of customer rate class;
- (b) The number of accounts in each such class;
- (c) Whether such accounts are metered;
- (d) The account numbers for each separate account;
- (e) The physical location, by street address, GPS marker (or other easily understood designation) of each separate account;
- (f) The basis and explanation for treating the account as a separate account, whether it is because it is separately metered or otherwise;
- (g) The total amount paid by Lexington to KAWC for the provision of water for each of its separate accounts for each year, going back the inception of KAWC's last approved rate increase; and
- (h) The total net projected impact for each such class under the proposed rate increase.

3. Does KAWC believe that the filing and/or proposed rate increases will in any way change the types of services for which it pays franchise fees to Lexington? If so, please explain.

4. Does the franchise fee assessed by Lexington currently apply to public fire hydrants? If so, will the franchise fee apply to the proposed Qualified Infrastructure Program (QIP)?

5. Please list all of the tariffs applicable to the use or consumption of water in Fayette County for which KAWC does not currently pay Lexington a franchise fee.

6. Is KAWC amenable to modifying the existing franchise fee tariff for public fire hydrants?

7. Does KAWC or any other American Water Company subsidiary have a tariff, contract or other arrangement under which the costs related to public fire hydrants are passed through to one or more of the other customer classes? If so, please list the name of the jurisdiction and provide the details of the arrangement, including any relevant supporting documents.

8. Do any American Water Company subsidiaries currently have a contract under which they provide sewer billing services on behalf of a local government? If so, please provide the name of the subsidiary and local government and provide a copy of each contract.

9. Please describe in detail any ongoing efforts of KAWC to expand its sale or provision of water.

10. Please describe in detail any ongoing efforts of KAWC to expand its involvement with the Partnership for Safe Water or any other treatment programs established by the Environmental Protection Agency.

11. Please describe in detail any and all lead testing services offered by KAWC to residential customers in Fayette County.

12. Please provide all information relating to prospective sales of water to communities or facilities outside Fayette County, and more specifically, whether such efforts are being increased due to additional water availability. If not, please explain. Please also explain any marketing or other efforts in detail and provide copies of any business or marketing plans.

13. How many KAWC employees are located in Lexington, Kentucky? Please provide a description of the number and types of position for each. If KAWC anticipates any change within the next five (5) years, please provide the specific details.

14. How many public fire hydrants are currently in use? How many of these hydrants are billed to Lexington?

15. How many public fire hydrants are projected to be in use during the forecasted test period? How many of these hydrants are projected to be billed to Lexington?

(a) Please provide a list of all of the ratepayers (other than Lexington) who pay for any public fire hydrants.

(b) What percentage of gross revenue does KAWC derive from public and private fire protection charges/rates, or similar charges/rates?

16. Is the Public Fire Service Revenue component of the cost of service study comprised of anything other than the total number of public fire hydrants and the tariff (KAWC Exhibit 36, Schedule A; KAWC Exhibit 37, Schedule M-3)?

(a) What is the total number of public fire hydrants in the base period?

(b) What is the total number of public fire hydrants in the forecasted test year?

(c) It appears that the number of public fire hydrants in the test year is less than the number of public fire hydrants in the base period (Exhibit 37, Schedule M-3). What is the basis for this? If this is an error, please provide a revised cost of service study and/or schedules.

17. Please provide a breakdown of the total number of the following fire hydrants in Fayette County: (a) public fire hydrants, (b) fire hydrants that are owned and maintained by KAWC, but located on private property, and (c) hydrants for which KAWC is not the owner. If possible, please provide the location of each hydrant. If this information is not available, please explain what action, if any, KAWC is taking to track this information going forward in time.

18. Please describe the process that is undertaken before a privately owned fire hydrant is added to KAWC's system. Please provide a copy of any contracts or other documents that are required to be followed or executed by the owner of the hydrant.

19. Please provide the following information with respect to public fire hydrant charges:

- (a) The total number of hydrants charged to Lexington during the base period;
- (b) The total number of hydrants charged to Lexington during the forecasted test period;
- (c) The basis for the projection of the number of hydrants charged to Lexington during the forecasted test period;
- (d) Any adjustment to hydrant charges to reflect system uses of hydrants, including but not limited to flushing the KAWC system; and
- (e) Please provide the number (quantity), type, and location (by street address or other easy to identify locator) of each fire hydrant for which Lexington currently pays a monthly tariff.

20. Please detail the administrative cost component attributable to public fire protection, and provide any applicable work papers showing how the cost component is calculated.

21. What is the cost to KAWC (per unit) to acquire each type of fire hydrant?

- (a) Would the creation of a tariff under which a public utility owned its fire hydrants result in a reduction in the existing public fire hydrant tariff? Why or why not?

22. How many additional new fire hydrants does KAWC anticipate being installed in Fayette County over the next 5 years for which Lexington would be billed? Please net out any hydrants that would be removed from the system as part of this calculation.

23. Will KAWC's proposed capital expenditures under the QIP extend to every customer class? Please identify each class and describe the anticipated replacements and/or upgrades.

24. Does KAWC have any plans to make significant capital investments to public fire protection facilities under the (QIP)? Please describe any and all efforts by KAW to improve public fire protection service.

25. Will the QIP tariff apply to all customer classes?

26. Please explain in detail KAWC's current policies, procedures, practices, and/or guidelines for testing, maintaining and/or replacing fire hydrants in Fayette County and provide copies of the same.

27. Please describe in detail all inspections, maintenance, or testing that must be performed by KAWC on each type of fire hydrant to ensure that it operates properly, and provide a list breaking down each of the components of the above and its cost, as well as how frequently each of the above must be performed, or actually is performed. Also describe in detail all maintenance that must be performed by KAWC on the public fire system to ensure that it operates properly. Please explain how KAWC maintains any such records.

28. Please provide the standard(s) that KAWC is using to determine that a fire hydrant is leaking, failed or obsolete. If a hydrant is identified in such a condition, is it still billed to the customer, or is immediately removed from future billing until corrected?

29. Is there a minimum flow rate at which KAWC deems a fire hydrant not to be useful? What if anything, is done with respect to such hydrants, when they are identified? If there is a difference in how different types of hydrants are treated, please explain.

30. Does KAWC require its privately-owned fire hydrant or service customers to provide any evidence or documentation that such systems are being adequately maintained, inspected, or tested on regular basis, or does KAWC ever perform any testing? Please explain.

(a) What, if anything, does KAWC do if it comes to its attention that a privately owned fire hydrant is no longer operable?

31. Would KAWC object to the PSC implementing additional minimum requirements with respect to maintenance, performance, or operational standards for all fire hydrants in Fayette County? Please provide a detailed response.

(a) Does your answer differ depending upon the type of hydrant involved (public, private, and privately owned)? If so, please explain why.

32. Are all privately-owned water lines metered at some point? If not, please explain how a determination is made with respect to whether such a line is metered.

33. What depreciable life basis (if any) for each type of fire hydrant does KAWC utilize? Is this the industry standard service? If not, please explain.

34. What is the individual fire flow requirement to which KAWC's water system in Fayette County has been designed and/or built?

(a) Does this differ in any way from the historical or current actual performance level of the system?

(b) How often is this tested?

(c) Are these results provided to the LFUCG Division of Fire and Emergency Services?

35. What is the minimum fire flow protection required to meet ISO guidelines? Please provide any supporting documentation.

36. Please provide the annual use of water for fire service for calendar years 2012-2015, inclusive, and for each month as it is or becomes available during the base period. If water use for fire service has been projected for the forecasted test period, please provide that projection as well.

37. What is the basis for the 10,000 gpm of fire flow (KAWC Exhibit 36, Schedule C)?

38. Does KAWC have any plans to acquire any additional water or wastewater facilities during the forecast period? If so, please provide a detailed explanation.

39. Please provide a list of all local governments in Kentucky (other than Lexington) who obtain water from KAWC and the terms of each such arrangement. As KAWC adds

additional customers of this type, please explain whether such customers will reduce the burden of the new treatment plant and pipeline on existing customers, or whether they will in any way reduce the cost of future water rates.

40. Has the actual current use of water met KAWC's projections from the last several years? Please explain.

(a) To what extent are current consumption and demand rates consistent with the projections KAWC has submitted in PSC proceedings since 2002?

41. Please provide the total amount of water supplied by KAWC to its customers on an annual basis since 2010. To the extent possible, please provide the same information broken down into counties or regions.

(a) Please provide this information for each category of ratepayer.

42. Does KAWC have a timeline for providing electronic billing (i.e., EDI protocol billing)?

43. Does KAWC have a timeline for implementing a system capable of providing customers with multiple accounts a summary or collective bill?

44. Does KAWC have an estimate of how much water has been lost due to leaking infrastructure? Please provide this information for the previous 5 years by volume and percentage of treated water.

45. Please describe what processes are in place to identify a potentially stuck meter or unknown leak (e.g. automated review of meter data).

46. Does KAWC have a formal policy or informal practice regarding expenses incurred by a customer due to an unknown leak? Does KAWC grant customers leniency in this situation? If so, please describe.

47. Please describe existing or planned water conservation programs aimed at end customers and the respective annual funding for such programs. For each such program, please provide an annual estimate of the quantity, in volume and percentage of treated water, of water which will not be consumed as result of the program.