

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY-)
AMERICAN WATER COMPANY) CASE NO.
FOR AN ADJUSTMENT OF RATES) 2015-00418

**RESPONSE OF COMMUNITY ACTION COUNCIL FOR
LEXINGTON-FAYETTE, BOUBON, HARRISON, AND NICHOLAS COUNTIES, INC.
TO KENTUCKY-AMERICAN WATER COMPANY'S DATA REQUESTS**

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Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and hereby responds to the data requests of Kentucky-American Water Company.

Respectfully submitted,



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COUNSEL FOR CAC

1. Reference Mr. Ratchford's testimony, page 10. Please produce any studies or evidence developed by or known to CAC that demonstrates that a graduated or tiered rate structure benefits low-income customers.

Witness: Malcolm J. Ratchford

Response:

CAC is not aware of any study that demonstrates a graduated or tiered rate structure specifically benefits low-income customers more than any other customer, or more than a reduced rate service for low income customers. However, CAC continues to encourage the Commission to order actions that would specifically assist low income customers' ability to pay the increasingly unaffordable rates of Kentucky American Water Company.

2. Reference Mr. Ratchford's testimony generally. Please produce any empirical and/or statistical evidence developed by or known to CAC regarding the household size of low-income customers as compared to household size of all customers.

Witness: Malcolm J. Ratchford

Response:

Mr. Ratchford's testimony did not discuss or make arguments based on household size of low-income customers. Community Action Council conducts approximately 30,000 intakes annually in Central Kentucky utilizing its Intake Referral and Information System (IRIS). Utilizing data from IRIS, the Council is able to provide the following profile of families served by our organization. The average household size of participants in all Community Action Council programming (all are low-income by various definitions) is as follows according to the Council's fiscal year:

July 1, 2011 – June 30, 2012: 2.28

July 1, 2012 – June 30, 2013: 2.29

July 1, 2013 – June 30, 2014: 2.27

July 1, 2014 – June 30, 2015: 2.20

This data reflects a mostly downward trend in household size. The Council does not maintain additional data regarding household size and customers with low-incomes.

CERTIFICATE OF SERVICE

I hereby certify that the June 6, 2016 electronic filing is a true and accurate copy of Response of CAC to Kentucky American Water Company's Data Requests and cover letter to be filed in paper medium; that the electronic filing has been transmitted to the Commission on June 6, 2016; that an original and one copy of the filing will be delivered to the Commission on June 6, 2016; that there are currently no parties excused from participation by electronic service; and that, on June 6, 2016, electronic mail notification of the electronic filing is provided to the following:

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