COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ROSALIND COLE	
COMPLAINANT V.))) CASE NO.
KENTUCKY-AMERICAN WATER COMPANY) 2011-00219)
DEFENDANT	<i>)</i>)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO KENTUCKY-AMERICAN WATER COMPANY

Kentucky-American Water Company ("Kentucky-American"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to each party of record. The information requested herein is due on or before October 3, 2011. Responses to requests for information shall be appropriately bound, tabbed and indexed.

Each response shall be under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky-American shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky-American fails to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for the failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

- 1. Provide copies of all bills sent to Ms. Cole from January 2, 2007 until present.
- 2. Provide copies of all correspondence, including notices, sent to Ms. Cole from January 2, 2007 until present.
 - 3. Provide Ms. Cole's meter location and meter test history.
- 4. If Kentucky-American has tested Ms. Cole's meters, provide the results of those tests.
- 5. Provide any documents, including photographs, compiled in any Kentucky-American investigation of Ms. Cole.
- 6. Provide a copy of Ms. Cole's payment history from January 2, 2007 until present.

7. State if any Kentucky-American employee has entered Ms. Cole's property. If the answer is yes, provide the employees, names, the purpose for which they entered the property, and the dates of their entrance.

Jeff Derouen

Executive Director

Public Service Commission

P. O. Box 615

Frankfort, KY 40602

DATED _ SEP 1 5 2011

cc: Parties of Record

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