

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

	SARAH WOLFORD)	
)	
	COMPLAINANT)	
V.)	CASE NO.
)	2011-00413
	KENTUCKY-AMERICAN WATER COMPANY)	
)	
	RESPONDENT)	

ANSWER AND MOTION TO DISMISS

Now comes the Respondent, Kentucky-American Water Company (“KAW”), and hereby moves the Commission to dismiss the Complaint filed in this matter by Complainant, Sarah Wolford.

For its Answer to the Complaint, KAW makes the following admissions, denials, statements and defenses.

1. In response to the statements in Paragraphs (a) and (b) of the Complaint, KAW admits that Sarah Wolford is a KAW customer whose service meter is located at: 118 Arcadia Park, Lexington, Kentucky 40503. KAW denies that its office is located at P.O. Box 371880, Pittsburgh, Pennsylvania 15250-7880. KAW states that its office is located at: 2300 Richmond Road, Lexington, Kentucky 40502.

2. In response to the allegations in the first sentence of the attachment to Paragraph (c) of the Complaint labeled “Basis for complaint,” KAW admits that, on September 6, 2011, Complainant received her first water bill from KAW for the 118 Arcadia Park service address

and that the amount of the September 6, 2011 water bill was \$645.23 for the period of August 2 to August 30, 2011, as reflected in the September 6, 2011 water bill attached hereto as Exhibit A.

3. In response to the allegation in the second sentence of the “Basis of complaint” that, “[b]elieving the bill was excessively high; we contacted KAW who sent one of their own inspectors to check our residence for outdoor leaks,” KAW admits that Complainant contacted its customer service center on September 8, 2011, as indicated on page 1 of Exhibit B (attached). KAW further admits that a KAW service representative went to Complainant’s residence on September 9, 2011, to check for leaks, as indicated at page 2 of Exhibit B and that the field representative observed no leaks, as indicated by the notation “no movement on meter.”

4. In response to the allegations in the third and fourth sentences of the “Basis of complaint” that, “[t]hat same day, we had our own plumber check for indoor and outdoor leaks,” and “[b]oth inspector and plumber found no evidence of a leak inside or outside,” KAW admits that, as stated in paragraph 3 above, its field representative observed no evidence of any leaks at Complainant’s residence on September 9, 2011. KAW admits that, as indicated on page 3 of Exhibit B, Complainant’s landlord, Duran Brown of Flat Rock Realty, stated to KAW’s customer service representative on September 9, 2011, that he had a plumber check for leaks at Complainant’s residence and that the plumber observed no leaks inside the house. KAW is without sufficient information to either admit or deny the allegation that Complainant’s plumber observed no leaks outside her residence on September 9, 2011 and, therefore, denies the same.

5. In response to the allegations in the fifth, sixth, seventh, eighth and ninth sentences of the “Basis of complaint” that:

We called KAW again to have our meter tested for accuracy. The meter was removed for testing on September 16 and replaced with a new meter. On September 19th, we received a notice from KAW explaining the results of our meter test. We then called KAW to

clarify the results. KAW had concluded that the meter was running accurately and that we were expected to pay the full amount of the bill by October 4.

KAW admits that Complainant requested that her service meter be tested by KAW on September 14, 2011, as indicated in the work order attached hereto as Exhibit C. KAW further admits that the results of the meter test, attached hereto as Exhibit D, show that the Complainant's meter was actually running *slow*—at 94% of accuracy. KAW admits that Complainant's service meter was replaced with a new meter at the time the testing was conducted. KAW admits that Complainant was advised regarding the results of the meter test on September 21, 2011, as indicated in Exhibit E (attached). KAW admits that Complainant was informed that, as the meter was not reading fast (over 102% of accuracy), that she would be responsible for paying for the water usage indicated in her September 6, 2011 water bill.

6. In response to the allegations in the tenth, eleventh, twelfth, thirteenth, and fourteenth sentences of the “Basis of complaint” that:

On September 22nd, we called KAW to inform them of our intention to dispute the bill and also asked how to file a complaint with the Public Service Commission (PSC). The customer service representative informed us that we would have to continue our dispute with the PSC and directed us there. KAW called September 26th to inform us that our paperwork was transferred to the PSC and that we would be expected to pay the full amount of our bill. They offered to set us up with a payment plan. We let the KAW representative know that we intended to continue dispute of the bill. She agreed to extend the due date for the bill to October 28, 2011.

KAW admits that, as indicated in Exhibit F (attached), Complainant called KAW on September 22, 2011, and indicated that she “would like to dispute bill and findings of meter test.” KAW admits that it discussed Complainant's dispute with the Public Service Commission's Customer Advocate Office, as indicated in the email attached hereto as Exhibit G. KAW admits that, as

indicated in Exhibit F, KAW's customer service representative provided the PSC's contact information to Complainant and that the service representative informed Complainant that once she filed a formal complaint, the service representative would not be able to discuss Complainant's disputed bill directly with her while the formal complaint was pending before the PSC. KAW denies that KAW's service representative "agreed to extend the due date for the bill to October 28, 2011." KAW admits that its customer service representative placed Complainant's account on hold until October 28, 2011, to prevent her service from being terminated while she was seeking to file her complaint in this matter.

7. In response to the allegations in the fifteenth, sixteenth, seventeenth, eighteenth, and nineteenth sentences of the "Basis of complaint" that:

We then contacted the PSC to inquire the status of our dispute. After asking us a few questions, the representative said she would call us back with more information. We received a call later that day that our paperwork had been reviewed. PSC said they found no inaccuracies in KAW's paperwork and said we "must have left a faucet on." We asked what further steps we could take. She informed us that our only other course of action was to file a formal complaint and she would send the paperwork.

KAW is without sufficient information to either admit or deny the allegations regarding Complainant's conversations with the PSC or PSC Staff and, therefore, denies the same.

8. To the extent that an affirmative response is required, in response to the allegations in the twentieth and twenty-first sentences of the "Basis of complaint" that, "[t]he primary name on the account is Sarah Wolford, who has been dealing with the KAW and PSC representatives," and that, "[t]he PSC Consumer Services Representative she has been speaking with is Rosemary," KAW admits the allegations in sentences twenty and twenty-one of the "Basis of complaint."

9. In response to the allegations in the twenty-second and twenty-third sentences of the “Basis of complaint” that, “[w]e live in a 3 bedroom, 2 bathroom home with 1 kitchen sink, 1 washer and 1 dishwasher,” and that “[t]his was our first water bill since moving to this residence,” KAW admits that the bill in dispute in this matter was the first water service bill rendered to Complainant for service at 118 Arcadia Park, Lexington, Kentucky. With regard to the number of rooms, sinks, and appliances in the 118 Arcadia Park residence, KAW is without sufficient information to either admit or deny the allegations and, therefore, denies the same.

10. KAW denies each and every allegation in the Complaint not specifically admitted to be true herein.

FIRST AFFIRMATIVE DEFENSE

Pursuant to 807 KAR 5:001, Section 12, the Complaint fails to set forth a prima facie case KAW has violated its tariff or any statute or Commission regulation, and the Complaint should be dismissed for that reason.

SECOND AFFIRMATIVE DEFENSE

As indicated in Exhibit G, after being contacted by the PSC’s Customer Service Office, KAW’s customer service representative examined the water usage records of the previous occupant of the 118 Arcadia Park residence and discovered that the prior occupant’s water usage was very high just prior to the date the prior occupant vacated the residence on August 1, 2011, likely indicating a leak at the residence. As indicated in Exhibit H (attached), Complainant initially contacted KAW on July 26, 2011 to transfer service from the prior occupant to her name on August 5, 2011, but she then requested that the account be transferred her name beginning August 2, 2011. The prior occupant’s usage information report shows that water usage at the 118 Arcadia Park residence in the five-day period between July 28, 2011, and August 2, 2011, was

7,500 gallons. It is notable that a faucet or toilet leaking at a rate of just one gallon per minute would use 7,200 gallons of water in five days ($5 \text{ [days]} \times 24 \text{ [hours]} \times 60 \text{ [minutes]} = 7,200$). As reflected in KAW's last rate case, the average *monthly* usage for KAW's residential customer is only 4,470 gallons.¹

This evidence, accompanied by the fact that no underground leaks were discovered by KAW's field service representative, shows that there was likely an indoor water leak at the 118 Arcadia Park residence that started before Complainant moved into the residence on August 6, 2011. Complainant's high water usage during the month of August 2011 was likely the result of this latent, indoor leak, which does not qualify for a hidden underground leak adjustment pursuant to KAW's tariff. As Complainant's high water usage in August 2011 was, more likely than not, caused by an indoor water leak and was not caused by any malfunction of KAW's service meter or any other act or omission by KAW, the Complaint should be dismissed.

WHEREFORE, for all of the reasons set forth above, Kentucky-American Water Company respectfully moves the Commission to:

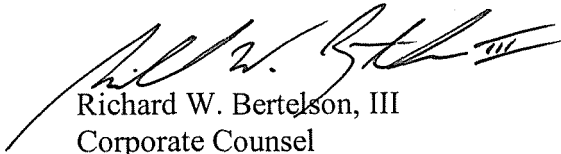
- (1) dismiss the Complaint without further action being taken by the Commission;
- (2) lift the stay on disconnection;
- (3) close this matter on the Commission's docket; and

¹ Case No. 2010-00036, Testimony of Edward L. Spitznagel, Jr., Ph.D. at 5-6. Dr. Spitznagel calculated average KAW residential customer usage at 155.67 gallons per day. 155.67 gallons multiplied by 365 days, divided by twelve months equals approximately 4,735 gallons per month.

(4) afford KAW and all other relief to which it may be entitled.

Dated November 4, 2011

Respectfully Submitted,



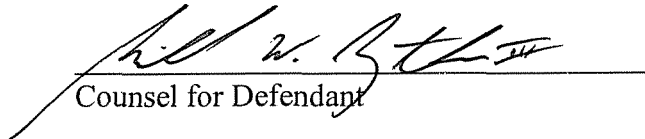
Richard W. Bertelson, III
Corporate Counsel
Kentucky-American Water Company
2300 Richmond Road
Lexington, Kentucky 40502
(859) 268-6367

Counsel for Kentucky-American Water Company

CERTIFICATE OF SERVICE

This is to certify that the original and 10 copies of the foregoing Answer have been filed on this 4th day of October 2011 at the Public Service Commission and that a true and accurate copy of same has been served via U.S. mail, return service requested, on the 4th day of October 2011, upon the following:

Sarah Wolford
118 Arcadia Park
Lexington, KY 40503



Counsel for Defendant

COMMONWEALTH OF KENTUCKY
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Exhibit A to Kentucky-American Water Company's Answer

Filed on November 4, 2011

Kentucky American Water

12-0629924-8

PO Box 371880
Pittsburgh, PA 15250-7880

\$645.23

For Service To: 118 S Arcadia Park

Sep 19, 2011

Amount Paid



Sarah E Woolford
118 S Arcadia Park
Lexington KY 40503-1360

Kentucky American Water
PO Box 371880
Pittsburgh, PA 15250-7880



Initial Bill

Please check here to change address or telephone number and print information on reverse side.

Customer Account Information

For Service To: Sarah E Woolford
118 S Arcadia Park
Account Number: [REDACTED]
Premise Number: [REDACTED]

Billing Period & Meter Information

Billing Date: Sep 06, 2011
Billing Period: Aug 02 to Aug 30 (28 days)
Next reading on/about: Nov 29, 2011
Rate Type: Residential

Meter readings in current billing period:

Meter Number 090738239N is a 5/8-inch meter.
Present-actual 104
Last-actual 24
100 Cubic Feet used 80
1 cu. ft. equals 7.50 gallons
Gallons used 60000

Billing Summary

-----Prior Balance-----	
Balance from last bill	\$.00
Payments as of Sep 06, 2011. Thanks!	.00
Total prior balance, Sep 06, 2011	.00
-----Adjustments-----	
Activation Fee	26.00
Total adjustments, Sep 06, 2011	26.00
-----Current Water Charges-----	
Meter Service Charge	8.90
Water Usage (\$3.975300 x 80.00)	318.02
Total water charges, Sep 06, 2011	326.92
-----Current Wastewater Charges--	
LFUCG - Sewer Minimum Fee	4.83
Sewer Usage (\$.00000 X 1.00)	.00
(\$ 3.64000 X 71.00)	258.44
Total Use Billed	72.00
	263.27
-----Other Current Charges-----	
LFUCG - Wtr Qual Mgmt Fee	4.39
Total other charges, Sep 06, 2011	4.39
-----Taxes-----	
School Tax	9.95
Franchise Fee - LFUCG	9.95
KRA Withdrawal Fee - 100CF	4.75
Total taxes, Sep 06, 2011	24.65
-----Total Current Charges-----	
	645.23
-----TOTAL AMOUNT DUE-----	
	\$645.23

Water Usage Comparison

Monthly usage in 100 cubic feet

Messages from Kentucky American Water

*Local Office: 2300 Richmond Road (Lexington) and 102 Main Street (Owenton).
** To pay by credit card, debit card or electronic check, call TOLL FREE 1-800-678-6301. Pay online at www.water.paymybill.com. A service fee will apply. Customers can also pay their water bills at our local office

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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Exhibit B to Kentucky-American Water Company's Answer

Filed on November 4, 2011

Utility Contacts by Account # (UCAG) - 6153310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path | Account # | Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit SID | UC Comment Entry | UC Def/Response

Representative WALKERTD Takisha Walker Contact Number 36239943

Contact Type HILOW Billing Inquiry

Account # | Third Party Type

Last / First / Init Woolford Sarah

Account Name Woolford, Sarah E Prefix

DBA Generate SID? Yes No

Address 1 116 S Arcadia Park SID Type

Address 2 Generate Ltr? Yes No Email N

Address 3 Lexington KY Letter Name

Zip Code 40503-1360 Phone Number 859-533-7475

Employer Business Phone

Contact Created 9/08/2011 17:04:08 BOYLANT

Contact Closed? Yes No 9/08/2011 17:09:02

Investigate

E-QIS VERIFYING

OK Cancel

Utility Contacts by Account # (UCAG) - 6153310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path | Account | Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit SID | UC Comment Entry | UC Def/Response

Contact Number 36239943 Contact Type HILOW Billing Inquiry

Print Date | Print Amount

Print Comment 1

Print Comment 2

Print Comment 3

Comment Lines	Type
Sarah will check property for leaks	C

Investigate | Fold/Unfold

E-QIS VERIFYING

OK Cancel

Utility Contacts by Account # (UCAC) 453310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account # [] Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit SID | UC Comment Entr | UC Del/Response

Representative WALKERTD Takisha Walker Contact Number 36239956

Contact Type HIFLW Billing Inquiry

Account # [] Third Party Type []

Last / First / Init Woolford Sarah E

Account Name Woolford, Sarah E Prefix []

DBA [] Generate SID? Yes No

Address 1 118 S Arcadia Park SID Type []

Address 2 [] Generate Lt? Yes No Email

Address 3 Lexington KY Letter Name []

Zip Code 40503-1360 Phone Number 859-539-7475

Employer [] Business Phone []

Contact Created 9/08/2011 17:09:11 BOYLANT

Contact Closed? Yes No 9/19/2011 10:36:07 MILLERJL

Investigate

E-CIS VER118B [OK] [Cancel]

Utility Contacts by Account # (UCAC) 453315 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account [] Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit SID | UC Comment Entr | UC Del/Response

Contact Number 36239956 Contact Type HIFLW Billing Inquiry

Print Date [] Print Amount []

Print Comment 1 []

Print Comment 2 []

Print Comment 3 []

Comment Lines	Type
*****	C
*****9-19-11 field was at the property on 9-09-11 read 186 no m	C
ovement on meter this is a new meter per service order customer w	C
ents meter tested called customer to set up meter test left messa	C
ge for customer to call me back to set up meter test jln (art)	C
9-14-11 set up meter test with customer unwitness could take 30 d	C
ays to get meter test results jln (art)	C

Investigate [] Fold/Unfold []

E-CIS VER118B [OK] [Cancel]

Utility Contacts by Account # (UCAC) - CS331D - Kennedy American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account # [] Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit S/D | UC Comment Entr | UC Dell/Response

Representative WALKERTD Takisha Walker Contact Number 36239984

Contact Type HILOW Billing Inquiry

Account # [] Third Party Type []

Last / First / Init Woolford Sarah E

Account Name Woolford, Sarah E Prefix []

DBA [] Generate S/D? Yes No

Address 1 118 S Arcadia Park S/D Type []

Address 2 [] Generate Ltr? Yes No Email N

Address 3 Lexington KY Letter Name []

Zip Code 40503-1360 Phone Number 859-533-7475

Employer [] Business Phone []

Contact Created 9/08/2011 17:34:08 ARCHIEB1

Contact Closed? Yes No 9/08/2011 17:35:27 ARCHIEB1

Investigate []

E-CIS VER 1108 OK Cancel

Utility Contacts by Account # (UCAC) - CS331D - Kennedy American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account [] Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit S/D | UC Comment Entr | UC Dell/Response

Contact Number 36239984 Contact Type HILOW Billing Inquiry

Print Date [] Print Amount []

Print Comment 1 []

Print Comment 2 []

Print Comment 3 []

Comment Lines	Type
Duran Brown/Flat Rock Realty/Landlord: 8595418931 stated that he had plumber go stated no water leaks in the inside of the house.	C

Investigate Fold/Unfold

E-CIS VER 1108 OK Cancel

Utility Contacts by Account # (UCAC) - 453310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account # [] Name Woolford, Sarah E

UC List/Acct # UC Acct Info New/Edit S/D UC Comment Entry UC Def/Response

Representative WALKERTD Takisha Walker Contact Number 36239992

Contact Type HILOW Billing Inquiry

Account # [] Third Party Type []

Last / First / Init Woolford Sarah E

Account Name Woolford, Sarah E Prefix []

DBA [] Generate S/D? Yes No

Address 1 118 S Arcadia Park S/D Type HILOW ReRead and/or Inspect

Address 2 [] Generate Ltr? Yes No Email N

Address 3 Lexington KY Letter Name []

Zip Code 40503-1360 Phone Number 859-533-7475

Employer [] Business Phone []

Contact Created 9/08/2011 17:41:30 BLACKJE

Contact Closed? Yes No 9/08/2011 17:44:03 BLACKJE

Investigate

E-CIS VERIFYING

OK Cancel

Utility Contacts by Account # (UCAC) - 453310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account [] Name Woolford, Sarah E

UC List/Acct # UC Acct Info New/Edit S/D UC Comment Entry UC Def/Response

Contact Number 36239992 Contact Type HILOW Billing Inquiry

Print Date [] Print Amount []

Print Comment 1 []

Print Comment 2 []

Print Comment 3 []

Comment Lines	Type
Re-read/inspect meter and check for leaks; customer has high bill. Customer has used leak kit.	S
Sarah called to get the meter looked at. She had a plumber out to look for leaks.	D
W001 Meter reading: 106.	S
NO MOVEMENT ON METER VERIFIED READING LEFT DOORKNOB NOTICE TALK WITH CUSTOMER ONLY BEEN IN HOUSE A MONTH WANTS METER TESTED.	S
BRADY	S
Re-read / inspect with customer involvement	S

Investigate Fold/Unfold

E-CIS VERIFYING

OK Cancel

Utility Contacts by Account # (UCAC) - CIS3310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path Account # Name Woolford, Sarah E

UC List/Acct # UC Acct Info New/Edit SID UC Comment Entr UC Defl/Response

Representative WALKERTD Takisha Walker Contact Number 36241059

Contact Type GNINQ General Inquiry

Account # Third Party Type

Last / First / Init Woolford Sarah E

Account Name Woolford, Sarah E Prefix

DBA Generate SID? Yes No

Address 1 118 S Arcadia Park SID Type

Address 2 Generate Lit? Yes No Email N

Address 3 Lexington KY Letter Name

Zip Code 40503-1360 Phone Number 859-533-7475

Employer Business Phone

Contact Created 9/09/2011 14:27:16 MERGELDA

Contact Closed? Yes No 9/12/2011 9:42:11

Investigate

E-CIS VER11A8 OK Cancel

Utility Contacts by Account # (UCAC) - CIS3315 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path Account Name Woolford, Sarah E

UC List/Acct # UC Acct Info New/Edit SID UC Comment Entr UC Defl/Response

Contact Number 36241059 Contact Type GNINQ General Inquiry

Print Date Print Amount

Print Comment 1

Print Comment 2

Print Comment 3

Comment Lines	Type
Sarah was told by bur service driver to call and request meter	C
test. He was not able to find any leaks. Please forward to	C
disputes.	C
Account is on hold.	C

Investigate Fold/Unfold

E-CIS VER11A8 OK Cancel

COMMONWEALTH OF KENTUCKY
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Exhibit C to Kentucky-American Water Company's Answer

Filed on November 4, 2011

** DUPLICATE COPY **

REGION: Fayette County	Kentucky American (KYPR) Production Meter Test - (Billing Only) MTEST		SERVICE ORDER #: 3299918
ROUTE/STOP: 20214 / 1715	HUNGATBG	10/17/11 12:51:38	SERVICES PRINTED: 1 1
GRID/EXT: 082 /	WORK ZONE: 12301		REQUESTED BY: SARAH
UTILITY TYPE: Water Service	SCHEDULE DATE: 9/15/2011	TIME: AM	
SEQUENCE #: 1	ORDER TAKEN BY: MOBERLMK	9/14/2011 9:09:00	
SERVICE ADDRESS: 118 S Arcadia Park	MAILING ADDRESS: 118 S Arcadia Park		
CITY/ST/ZIP: Lexington KY 405031360	DISTRICT: Lexington		
CUSTOMER NAME: Woolford, Sarah E	BILLING CYCLE: 2	ACCOUNT #:	
NEW CUSTOMER NAME:	WLPP: NO	PREMISES#:	
BILL CLASS: Residential	PHONE NUMBER:		
LAST NOTICE:	CALL BACK NUMBER:		
HEALTH ALERT:	CREW: West Section 1	CREDIT TYPE: 0000	
SERIAL NUMBER:	METER TYPE:	METER NUMBER:	
# OF DIALS: SIZE:	INSTALL DATE:	REMOTE ID #:	
MFG:	LAST TEST DATE:		
SERIAL NUMBER:	METER TYPE:	METER NUMBER: 090738239N	
# OF DIALS: SIZE:	INSTALL DATE:	REMOTE ID #:	
MFG:	LAST TEST DATE:		
TAP NUMBER: 012067907	PAST DUE AMOUNT:	LAST PAYMENT DATE: 9/22/2011	
TAP SIZE:	LAST PAYMENT AMT: 120.00		
TAP LOCATION:			
MEASUREMENTS:			
CURRENT READ: 00000106	LAST S/O WORKED: 3299918 MTEST 9/15/2011		
DATE READ USE RTP	DATE READ USE RTP	DATE READ USE RTP	
09/15 106 2 S	07/28 14 13 D	04/28 235 8 M	
09/29 2 2 D	06/16 246 3 S	03/30 227 10 M	
08/30 104 80 D	06/29 1 1 D	02/25 217 7 M	
08/02 24 10 S	05/27 243 8 M	01/28 210 9 M	
PENDING SO:	GET NEXT TO:		
	ADDRESS BEFORE: 120 S Arcadia Park		
	ADDRESS AFTER: 116 Arcadia Park		
CUR/RMVD METER:	DIAL #1 RDG:	#2:	#3:
NEW/SET METER:	DIAL #1 RDG:	#2:	#3:
METER LOCATION:	Radio Reading; Pit / Tile; Utility		
METER READ: 3' R OF HOUSE; Utility; MIU 1484184756; SERVICE NUMBER: 012732			
COMMENTS: 3' R OF HOUSE; Utility			

METER: LOCKED STUCK DAMAGE/TAMPER REGIST: _____ sec/min
 FOUND: ___ ON ___ OFF ___ UN TO DETERMINE AT ___ CORP ___ STOP ___ MB _____ INSIDE
 LEFT: ___ ON ___ OFF ___ UN TO DETERMINE AT ___ CORP ___ STOP ___ MB _____ INSIDE

FOLLOW UP REQUIRED START DATE: _____ TIME: _____
 COMPLETED BY: _____ DATE: _____ TIME: _____ KEYED: _____

COMMENTS: customer wants the meter tested unwitness
customer had \$645.23 opening bill?
W001 Out meter reading: 106.
W001 In meter ID: 090072440N reading: 0.

SERVICE CONTINUED

SERVICE ORDER #:
3299918
SERVICES PRINTED:

<u>Chnge meter for test.....M.M.</u>	1	1
<u>Changed Meter</u>		
<u>Office review required.</u>		
<u>W001 Found service on.</u>		
<u>W001 Left service on.</u>		
<u>W001 Remote ID entered: 1483593166.</u>		
<u>W001 Read out type: 11.</u>		
<u>W001 Meter change reason code: CC.</u>		
<u>Office Review Complete, No Action Required. Correct Meter is</u>		
<u>attached to this Premise. SMW 9/16/11</u>		

END OF SERVICE

END OF SERVICE ORDER #: 3299918

COMMONWEALTH OF KENTUCKY
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Exhibit D to Kentucky-American Water Company's Answer

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Kentucky-American Water Company

Customer Name Sarah E. Woolford Account # [REDACTED]
 Service Address 118 S. Arcadia Park Premise# [REDACTED]
 Meter Size 5/8 Make N Number 90738239 Date 9-19-11

Readings

	GPM	Begin	End	% of Accuracy	Required Accuracy
Low flow	<u>4</u>	<u>9200</u>	<u>9294</u>	<u>94</u>	<u>95%-101%</u>
Intermediate flow	<u>2</u>	<u>9300</u>	<u>9400</u>	<u>100</u>	<u>98.5%-101.5%</u>
Maximum flow	<u>15</u>	<u>9400</u>	<u>0398</u>	<u>99.8</u>	<u>98.5%-101.5%</u>

IF ANY OF THE TESTS ABOVE ARE NOT WITHIN THE REQUIRED ACCURACY LIMITS THEN FURTHER TESTING IS REQUIRED BELOW.

Readings

Flow Rate %
Of Capacity

	GPM	Begin	End	% of Accuracy
25%	<u>5</u>	<u>0400</u>	<u>0500</u>	<u>100</u>
50%	<u>10</u>	<u>0500</u>	<u>0600</u>	<u>100</u>
75%	<u>15</u>	<u>0600</u>	<u>1596</u>	<u>99.6</u>

Average of All 3 tests: 97.93
 Less Standard: 100%
 Equal % of Error: _____ Fast _____ Slow _____
 Before Test Reading: 0106.10 after Test Reading 0107.15
 Customer Witness? Yes _____ No ✓

IF PERCENT OF ERROR IS GREATER THAN 2% THEN COMPLETE THE APPROPRIATE SECTION BELOW.

Length of time error is known to have existed _____
 FAST METER basis for refund _____ Amount of refund _____
 SLOW METER basis for additional Bill _____ Amount of additional Bill _____
 Comments Meter failed test, MTU and register OK, will not reset, will keep 1 year

Copy to : _____

Disputes : Jay Miller Meter Tech. : Tony Richardson

Repair Crew Report

Kentucky American Water

AMERICAN WATER

District Central Northern

Leak ID _____

House # 118

Street S Arcadia Park

Cross Street _____

GPS _____

Pressure Zone _____

Map Ref. _____

Municipality _____

Date Reported _____

Date Repaired _____

Date cleaned up _____

Date Completed 9-5-11

Chlorine Residual _____

Est. Water Loss _____ gal

Premise # _____

Service Order # 3299918

Repair Data

Time Crew Called _____ AM PM

Time Crew Onsite _____ AM PM

Pressure Before Repair _____ psi

Time Water Turned Off _____ AM PM

Time Water Turned On _____ AM PM

Pressure After Repair _____ psi

Time Completed _____ AM PM

Customers out of Service # Res # Com

Repaired Under Pressure

Crew Leader Assigned Mr. Mohr Supervisor: _____

Work to be Completed

LEAK REPAIR BOX REPAIR READING METER CHANGE

HYD REPAIR RESTORATION FLUSH W/O

Sarah E. Woolford Acc

No witness

Jay Miller

Pipe Information

Material Type & Size _____

Pipe Depth _____ ft

Leak Confirmed

KAWI Leak Confirmed

Customer Leak

No Leak

Other _____

Total Water Loss: _____ gpm @ _____ min = _____ gal

Leak Site

Main Hydrant/Lateral

Service Curb Stop

Hydrant Saddles

Leak Type

Longitudinal/Spilt Length _____

Pinhole(s)

Corrosion Hole

Blowout/Separation

Struck

Inlet Leak

Outlet Leak

Valve Fitting

Blow Off Bolts/Gasket

Air Release Repair Clamp

Other _____

Water Information

Periodic Stuck Remove Burst Test

Size 5/8 Make N

Old MTR # 090738239 Old Read 0106

Old MTR # 1484184756

Size 3/8 MAKE N

New MTR # 090072440 New Read 0000

New MTR # 1483593166

Crew Names

Employee & Job Code	Reg	OT	DT
CL-UT-BH-HR-JE			
CL-UT-BH-HR-JE			
CL-UT-BH-HR-JE			
CL-UT-BH-HR-JE			
CL-UT-BH-HR-JE			
CL-UT-BH-HR-JE			

Restoration

Paving Needed (Type) _____ X 1483593166 (H) Sq. Ft.

Erosion Cont'l Comment _____

Labor Comment _____

Equipment Comment _____

Paving Comment _____

Seed X = _____ Sq. Ft.

Sod X = _____ Sq. Ft.

Crews Comments on work completed

Soil Conditions Type A B C

Seal/Inertion Method Tarp Other _____

Materials & Equipment Used on Repair

Retired Material

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2011-00413

Exhibit E to Kentucky-American Water Company's Answer

Filed on November 4, 2011

Utility Contacts by Account # (UCAG) - CIS3310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account # [] Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit S/O | UC Comment Entr | UC Def/Response |

Representative WALKERTD Takisha Walker Contact Number 36256630

Contact Type FLWUP Service Order Inquiry

Account # [] Third Party Type []

Last / First / Init Woolford Sarah E

Account Name Woolford, Sarah E Prefix []

DBA [] Generate S/O? Yes No

Address 1 118 S Arcadia Park S/O Type []

Address 2 [] Generate Ltr? Yes No Email N

Address 3 Lexington KY Letter Name []

Zip Code 40503-1360 Phone Number 659-533-7475

Employer [] Business Phone []

Contact Created 9/21/2011 13:19:39 JOHNSOT2

Contact Closed? Yes No 9/21/2011 13:21:24

Investigate []

E-CIS VERIFYING OK Cancel

Utility Contacts by Account # (UCAG) - CIS3315 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path [] Account [] Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit S/O | UC Comment Entr | UC Def/Response |

Contact Number 36256630 Contact Type FLWUP Service Order Inquiry

Print Date [] Print Amount []

Print Comment 1 []

Print Comment 2 []

Print Comment 3 []

Comment Lines	Type
Sarah called about meter test result advised that meter has been pulled for testing and confirmed as accurate. Customer upset about it.	C
	C
	C

Investigate Fold/Unfold []

E-CIS VERIFYING OK Cancel

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2011-00413

Exhibit F to Kentucky-American Water Company's Answer

Filed on November 4, 2011

Utility Contacts by Account # (UCAG) - 6153310 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path | Account # | Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit S/D | UC Comment Entr | UC Def/Response

Representative WALKERTD Takisha Walker Contact Number 36258635

Contact Type CFLWP Customer Follow-Up

Account # Third Party Type

Last / First / Init Woolford Sarah E

Account Name Woolford, Sarah E Prefix

DBA Generate S/D? Yes No

Address 1 118 S Arcadia Park S/D Type

Address 2 Generate Ltr? Yes No Email N

Address 3 Lexington KY Letter Name

Zip Code 40503-1360 Phone Number 859-533-7475

Employer Business Phone

Contact Created 9/22/2011 16:27:26 SETTLESZ

Contact Closed? Yes No 9/22/2011 16:35:22 SETTLESZ

Investigate

E-CIS VERSIONS OK Cancel

Utility Contacts by Account # (UCAG) - 6153315 - Kentucky American (KYPR) Production

File Edit Functions Go Path Help

Path | Account | Name Woolford, Sarah E

UC List/Acct # | UC Acct Info | New/Edit S/D | UC Comment Entr | UC Def/Response

Contact Number 36258635 Contact Type CFLWP Customer Follow-Up

Print Date Print Amount

Print Comment 1

Print Comment 2

Print Comment 3

Comment Lines	Type
Customer would like to dispute bill and findings of mete	C
r. test. States there is no way she could have used that much wate	C
r. Had a plumber come out and they found nothing wrong also.	C
Customer states she was going to call the PUC-I informed her we c	C
an no longer help her if she calls them she will have to handle e	C
verything with PUC-Customer decides she is going to file with the	C
PUC.	C

Investigate Fold/Unfold

E-CIS VERSIONS OK Cancel

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2011-00413

Exhibit G to Kentucky-American Water Company's Answer

Filed on November 4, 2011



Bethany G
Hungate/KAWC/AWWSC
09/23/2011 10:13 AM

To "Tutt, Rosemary (PSC)" <Rosemary.Tutt@ky.gov>@AWX
cc kawc.fieldservices@amwater.com
bcc

Subject Re: 2011_2907.pdf - Wolford

Hello Rosemary

I have reviewed the account with Takisha and we looked at the account and previous accounts very closely. It looks like there was some kind of leak there starting with the previous tenant. The previous tenants usage went up right before they moved out 08/01/2011. I have attached both tenants usage and the meter failed the meter test slow on the low flow and can not be reset. So the customer will not get the adjustment for high usage. The customer is not responsible for the previous tenants bill as you can see from the usage reports. All usage is from the time she took responsibility.

Thanks



118ArcadiaPrevioustenant.pdf Woolford.pdf 120068456_001.pdf

Bethany Hungate
Customer Advocate Office
Kentucky American Water
2300 Richmond Rd
Lexington, KY 40502
(859)269-2386 phone Opt. 6
(859)268-6315 Fax

"Tutt, Rosemary (PSC)" <Rosemary.Tutt@ky.gov>



"Tutt, Rosemary (PSC)"
<Rosemary.Tutt@ky.gov>
09/22/2011 04:54 PM

To <kawc.fieldservices@amwater.com>
cc

Subject 2011_2907.pdf - Wolford

[attachment "2011_2907.pdf" deleted by Bethany G Hungate/KAWC/AWWSC]

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2011-00413

Exhibit H to Kentucky-American Water Company's Answer

Filed on November 4, 2011

** DUPLICATE COPY **

REGION: Fayette County	Kentucky American (KYPR) Production		SERVICE ORDER #: 1451427					
ROUTE/STOP: 20214 / 1715	Turn On Water ON		SERVICES PRINTED: 1 1					
GRID/EXT: 082 /	HUNGATBG 10/17/11 12:50:28	WORK ZONE: 12301	REQUESTED BY: SARAH					
UTILITY TYPE: Water Service	SCHEDULE DATE: 8/02/2011	TIME: AM						
SEQUENCE #: 1	ORDER TAKEN BY: MOBERLMK	7/26/2011 17:24:00						
SERVICE ADDRESS: 118 S Arcadia Park	MAILING ADDRESS: 118 S Arcadia Park							
CITY/ST/ZIP: Lexington KY 405031360	DISTRICT: Lexington							
CUSTOMER NAME: Woolford, Sarah E	BILLING CYCLE: 2	ACCOUNT #:						
NEW CUSTOMER NAME:	WLPP: NO	PREMISES#:						
BILL CLASS: Residential	PHONE NUMBER:							
LAST NOTICE:	CALL BACK NUMBER:							
HEALTH ALERT:	CREW: West Section 1	CREDIT TYPE: 0000						
SERIAL NUMBER:	METER TYPE:	METER NUMBER: 090738239N						
# OF DIALS: SIZE:	INSTALL DATE:	REMOTE ID #:						
MFG:	LAST TEST DATE:							
TAP NUMBER: 012067907	PAST DUE AMOUNT:	LAST PAYMENT DATE: 9/22/2011						
TAP SIZE:	LAST PAYMENT AMT: 120.00							
TAP LOCATION:								
MEASUREMENTS:								
CURRENT READ: 00000000 LAST S/O WORKED: 3299918 MTEST 9/15/2011								
DATE	READ	USE RTP	DATE	READ	USE RTP	DATE	READ	USE RTP
09/15	106	2 S	07/28	14	13 D	04/28	235	8 M
09/29	2	2 D	06/16	246	3 S	03/30	227	10 M
08/30	104	80 D	06/29	1	1 D	02/25	217	7 M
08/02	24	10 S	05/27	243	8 M	01/28	210	9 M
PENDING SO:		GET NEXT TO:						
		ADDRESS BEFORE: 120 S Arcadia Park						
		ADDRESS AFTER: 116 Arcadia Park						
CUR/RMVD METER:	DIAL #1 RDG:	#2:	#3:					
NEW/SET METER:	DIAL #1 RDG:	#2:	#3:					
METER LOCATION:	Radio Reading; Pit / Tile; Utility							
METER READ:	3' R OF HOUSE; Utility; MIU 1484184756; SERVICE NUMBER: 012732							
COMMENTS:	3' R OF HOUSE; Utility							

METER: LOCKED STUCK DAMAGE/TAMPER REGIST: _____ sec/min
 FOUND: ___ ON ___ OFF ___ UN TO DETERMINE AT ___ CORP ___ STOP ___ MB _____ INSIDE
 LEFT: ___ ON ___ OFF ___ UN TO DETERMINE AT ___ CORP ___ STOP ___ MB _____ INSIDE

FOLLOW UP REQUIRED START DATE: _____ TIME: _____
 COMPLETED BY: _____ DATE: _____ TIME: _____ KEYED: _____

COMMENTS: Advised customer of \$26.00 applicable fee.
Water is on.
W001 Meter reading: 24.
Read Only
Left Notice / Posting
W001 Found service on.
W001 Left service on.

SERVICE CONTINUED

SERVICE ORDER #:

1451427

SERVICES PRINTED:

sarah called to turn water on. issued on order. declined eft. sla 1 1
p no. She originally scheduled for the 5th. The after scheduling
she changed to marry the service orders to avoid liability script
ing.

END OF SERVICE

END OF SERVICE ORDER #: 1451427