

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BENT TREE CONDOMINIUM ASSOCIATION)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2019-00133
)	
KENTUCKY-AMERICAN WATER COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BENT TREE CONDOMINIUM ASSOCIATION

Bent Tree Condominium Association (Bent Tree), pursuant to 807 KAR 5:001, are to file with the Commission the original and four copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.


Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered 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 the 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.

Bent Tree shall make timely amendment to any prior response if Bent Tree 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 Bent Tree fails or refuses to furnish all or part of the requested information, Bent Tree shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Bent Tree shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Bent Tree's response to the Kentucky-American Water Company's (Kentucky-American) motion to dismiss. In its response, Bent Tree refers multiple times to the fact that the Kirklevington meter has been tested by Kentucky-American, the Commission, or an independent third party. Bent Tree appears to be hinting that Kentucky-American's testing of the meter is not accurate. State the basis for this belief.

2. In the formal complaint, Bent Tree refers to communications with Kentucky-American that took place by email. Provide copies of any email communication that has taken place with Kentucky-American from October 2017 to the present.

For 
Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **JUN 27 2019**

cc: Parties of Record

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