

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S SECOND 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 ten 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.

Kentucky-American shall make timely amendment to any prior response if Kentucky-American 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 or refuses to furnish all or part of the requested information, Kentucky-American 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, Kentucky-American 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 the case in general. Provide copies of all bills that Kentucky-American issued to Bent Tree Condominium Association (Bent Tree) from June 2017 through present day. On the bills, differentiate between the Kirklevington Road and the Redding Road meters, and designate whether the bill was based on an actual or estimated read of the meter.

2. Refer to Kentucky-American's Answer and Motion to Dismiss in which it admits the allegation, in paragraph 16 of the complaint, that on February 6, 2018, it installed two new meters and began taking hourly readings. Refer also to Kentucky-

American's response to Commission Staff's First Request for Information (Staff's First Request), Item 1(a) and (b).

a. Explain in full detail why Kentucky-American installed two new meters to serve Bent Tree. Be sure to include in the explanation whether Kentucky-American replaced the meters on its own initiative or whether the customer requested that the old meters be replaced with new meters.

b. Provide the date that the two new meters were installed at Bent Tree.

c. Provide all meter test results associated with Bent Tree's meters. For each of the meter test results designate whether it is for the old meter, new meter, etc., and differentiate between the Kirklevington Road and Redding Road meters.

d. Confirm whether Kentucky-American still has the old meters that were pulled from Bent Tree's Kirklevington Road and Redding Road locations. If not, explain why not.

3. Refer to Bent Tree's formal Complaint, page 4, in which it states that in July 2017, the consumption of water and billings for the Kirklevington meter account nearly doubled and continued at unusually high rates through May 2018, but then returned to historic levels.

a. Explain whether Kentucky-American determined through an investigation why the consumption of water at the Kirklevington meter doubled.

b. Explain whether Kentucky-American determined through an investigation why the consumption of water at the Kirklevington meter returned to historic levels after May 2018.

4. Refer to Bent Tree's formal Complaint, pages 5 and 6.

a. Explain in full detail whether Kentucky-American informed Bent Tree on or about March 9, 2018, that a leak was found at the Redding Road location, and not the Kirklevington location. Also, provide a detailed explanation as to why Kentucky-American thought the Redding Road location had a leak, and provide copies of all documentation regarding the same.

b. Explain in full detail whether Kentucky-American informed Bent Tree on or about July 25, 2018, that the suspected leak was actually associated with the Kirklevington Road address and not the Redding Road address. Also, explain why Kentucky-American thought the Kirklevington Road address had a leak, and provide copies of all documentation regarding the same.



Kent A. Chandler
Executive Director
Public Service Commission
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DATED MAR 09 2020

cc: Parties of Record

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