

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LOWELL DEWAYNE SHEPHERD)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2019-00259
)	
KENTUCKY-AMERICAN WATER COMPANY)	
)	
DEFENDANT)	

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 an original and seven copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the entry of this request for information. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the individual responsible for responding to 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 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 or refuses to furnish all or part of the requested information, it 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 Kentucky-American's current tariff, Sheet No. 13, which states that the utility will monitor customer usage on a monthly basis and if a current month's usage shows an unusual deviation from historical usage, the utility will notify the customer and take steps to determine the reason for the unusual deviation. Explain what steps Kentucky-American took with Mr. Shepherd when it issued a bill for the service period of January 14, 2019 – February 11, 2019, which included a much higher usage amount that deviated from his historical usage.

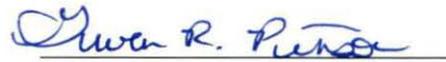
2. Refer to Kentucky-American's customer meter test form in Kentucky-American's Answer and Motion to Dismiss (Answer), Tab 1.

- a. Explain in detail what is meant by "[w]ould not data log."
- b. Explain in detail what is meant by "Hot Rod defective."
- c. Explain in detail how Kentucky-American concluded that the meter passed all tests if it would not data log and the Hot Rod was defective.
- d. Explain in detail why Kentucky-American scrapped the meter.

3. Refer to Kentucky-American's Answer, Tab 2. In Mr. Shepherd's bill issued for the service period February 12, 2019 – March 11, 2019, the customer's usage is measured in 100 CF through February 26, 2019, and then measured per 100 Gallons through March 11, 2019.

- a. Explain in detail why a customer's bill would be measured in 100 CF if there is no cost per 100 CF listed in its current tariff.
- b. Explain in detail if there are other Kentucky-American customers that are billed per 100 CF, and how the cost of water is calculated on their monthly bill.

4. Refer to 807 KAR 5:006, Section 7(5)(a), which states that each utility shall read customer meters at least quarterly, except if prevented by reasons beyond its control. 807 KAR 5:006 Section 7(5)(d), states that if due to reasons beyond its control, a utility is unable to read a meter, the utility shall record the date and time the attempt was made, if applicable, and the reason the utility was unable to read the meter. Provide the date and time that each attempt to read Mr. Shepherd's meter was made by Kentucky-American, and the specific reason(s) Kentucky-American was unable to read the meter for the service period of December 12, 2018 – January 13, 2019.



Gwen R. Pinson
Executive Director
Public Service Commission
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DATED NOV 14 2019

cc: Parties of Record

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