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RECEIVED

JUL 25 2019

**PUBLIC SERVICE
COMMISSION**

July 25, 2019

HAND DELIVERED

Gwen R. Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

Re: Case No. 2019-00093

Dear Ms. Pinson:

Enclosed please find Kentucky-American Water Company's Responses to the Commission Staff's First Request for Information in the above-referenced matter.

Very truly yours,

A handwritten signature in blue ink that reads "Lindsey W. Ingram III".

Lindsey W. Ingram III

Enclosure

JUL 25 2019

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2019-00093
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

PUBLIC SERVICE
COMMISSION

Witness: Jasmine S. Mungo

1. Refer to the response to Mr. and Ms. Ison's Complaint filed on May 10, 2019, in which you state that "copies of all bills for service from December 18, 2018 to the present are attached collectively as Exhibit 1." The first bill attached is dated February 7, 2019, and lists its service period as June 22 to January 24 (214 days). Provide an explanation for the unusually long service period on this bill and state whether any accurate monthly bills exist for the period from December 2018 to February 2019. If so, provide copies of those bills.

Response:

The Commission's May 2, 2019 Order directed KAW to file "all bills . . . from December 2018 to the present" when KAW responded to the Complaint in this matter. KAW did so by attaching those bills to its May 10, 2019 response. One of those bills included the bill referenced in this question which is a bill dated February 7, 2019 and covers a service period of June 22, 2018 to January 24, 2019 (217 days). That bill was issued and covered the unusually long time period because, during that time period, some bills were based on *estimated* usage rather than *actual* usage.

Under certain circumstances, when KAW cannot obtain reliable actual usage for billing, estimated usage is used instead. This can happen when KAW's automatic radio read meter system is unable to obtain reliable actual usage. Such an inability can happen for a number of reasons, including a communication breakdown between the signal emitting device on a meter (which is called a meter interface unit or "MIU") and the receiving device located in a KAW vehicle that is driven by a customer premise for the purpose of obtaining usage information. That communication breakdown can happen because of a dead or malfunctioning battery in the MIU, a physical obstruction on the MIU such as yard waste, sod, snow, or ice, an inadvertently damaged MIU from rakes, shovels, or mowers, or even intentional tampering with the MIU. Regardless of the cause, if actual usage data is not transmitted, KAW's billing system generates and sends a bill based on estimated usage. KAW believes this is what happened in the Isons' case when KAW's system generated estimated usage for most months during this 217-day period.

However, it is imperative to understand that even if there is a communication breakdown due to an MIU problem that prevents the transmission of actual usage data to KAW's employee, the meter itself still retains the actual usage data. It is just that communication of that actual usage data failed to occur. Therefore, when KAW removed the meter from the Ison premise on February 7, 2019, KAW was able to obtain that retained actual usage data directly from the meter itself. And, as explained in KAW's May 10, 2019 response to the Complaint, that meter tested accurately. Thus, KAW was then in a position to bill

the Isons for their accurate and actual usage for that 217-day time period. KAW did so when it sent the February 7, 2019 bill that is the subject of this data request. Note page 3 of 6 and page 4 of 6 of that February 7, 2019 bill indicate “invalid meter reads,” cancellation of those old bills, and a rebilling based on the actual usage amounts obtained from the meter itself. This is what KAW describes as a “cancel/rebill” and is why the service period was for 217 days.

Unfortunately, when KAW generated the February 7, 2019 bill, it made an inadvertent mistake. It recorded the usage at 973 when it was only 913. This resulted in the February 7, 2019 bill for a total of \$365.32 being too high. KAW soon realized its mistake and recalculated that bill with the correct usage of 913. This led to the February 19, 2019 bill for a total of only \$.56 that is also attached to KAW’s May 10, 2019 response to the Complaint. So, after all of that, the Isons owed \$.56 for that 217-day period.

KAW explained all of this to the Isons and, as described in KAW’s May 10, 2019 response, Mr. Ison was pleased with that result. However, upon receipt of the subsequent February 22, 2019 bill for \$147.51, the Isons refused to pay it. Thus, KAW’s believes that \$147.51 is the amount at issue in this case. As set forth in KAW’s May 10, 2019 response, that bill was based on actual usage data obtained from an accurate meter for the 28-day period from January 25, 2019 to February 21, 2019. Therefore, the Isons owe that amount.

Set forth below is a chart reflecting the original data used for billing and the “rebilled” data used to prepare the February 19, 2019 rebill for the 217-day period.

Date	Original Billing Read	Coding	Rebilled Read
6/21/2018	861	A	861
7/23/2018	877	E	862
8/22/2018	885	E	863
9/25/2018	864	A	864
10/23/2018	868	A	868
11/26/2018	875	E	869
12/26/2018	870	A	870
1/24/2019	884	A	884
2/7/2019 meter change	973	S	913

**KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2019-00093
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

Witness: Jasmine S. Mungo

2. In their Complaint, Mr. and Mrs. Ison state that since their meter was replaced on February 7, 2019, it has been inspected three times and that each time the technician advised Mr. and Mrs. Ison and Kentucky-American that the new meter was functioning properly and the replaced meter was not reliable. Provide the name of the technician(s) who performed the three meter inspections after February 7, 2019, the dates of those inspections, and any notes or reports resulting from the inspections.

Response:

It is correct that three inspections occurred. Copies of those inspection reports are attached and reflect the following:

On 2/13/19, KAW Field Service Representative Robert Samuels completed a check meter service order with the following comments:

Check Meter, Verify Serial #, Read data log meter and send results to Joshua Riley in local office thank you Special Handling has been requested for 02/13/2019. Customer notified that Spec. Handl. does not guarantee service on requested day [Current]Meter Number: 085346287N, Read1: 0000 [samuelrl] [02/13/2019 02:46 PM]: CHECK METER HAS BEEN CHANGE METER NUMBER 26985651 MIU 1551220074

On 2/15/19, KAW Field Service Representative Bryan Roser completed a check meter service order with the following comments:

Check Meter, Verify Serial #, Read please data log meter and send results to Joshua riley in local office Special Handling has been requested for 02/15/2019 . Customer notified that Spec. Handl. does not guarantee service on requested day [roserb] [02/15/2019 08:55 AM]: Meter : [085346287N] Data log meter per local office request. Meter change done at some time. Order still shows old meter number. The correct meter number for this premise is 26985651-5/8 Badger. The MIU number is 1551220074 and reads 00011.Office Review Required


On 3/4/19, KAW Field Service Representative Robert Samuels completed a check meter service order with the following comments:

Check Meter, Verify Serial #, Read current meter read shows estimated, please pick up current read and make any needed repairs or adjustments, thank you Special Handling has been requested for 03/04/2019 . Customer notified that Spec. Handl. does not guarantee service on requested day [Current]Meter Number: 26985651, Read1: 00035 [samuelr1] [03/04/2019 01:27 PM]: meter ok

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF FAYETTE)

The undersigned, **Jasmine S. Mungo**, being duly sworn, deposes and says she is the Manager, Customer Accounts for Kentucky-American Water Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.



Jasmine S. Mungo

Subscribed and sworn to before me, a Notary Public in and before said County and Commonwealth, this 23rd day of July, 2019.

 (SEAL)

Notary Public

My Commission Expires:

7/25/2020

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing by regular U.S. mail, postage prepaid, this 25th day of July, 2019, upon the following:

Earl D. Ison
Brenda C. Ison
1404 Saddle Club Way
Lexington, KY 40504-1696



Counsel for Kentucky American Water



Brenda C Ison



Customer Premise History

20 year

Move In: 09/29/99

210007633888 | 9120115059

1404 Saddle Club Way
Lexington
KY, US, 40504-1696



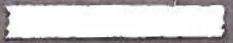
Primary Contact Information

Mailing Address:
1404 Saddle Club Way
Lexington
KY, US, 40504-1696

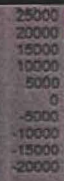
Primary Tel. Number :



@Email:



(in gallons)



Service Orders

Service Order Details

Notes

1) Check Meter, Verify Serial #. Read data log meter and send results to Joshua Riley in local office thank you Special Handling has been requested for 02/13/2019 . Customer notified that Spec. Handl. does not guarantee service on requested day

2) Check Meter, Verify Serial #. Read data log meter and send results to Joshua Riley in local office thank you Special Handling has been requested for 02/13/2019 . Customer notified that Spec. Handl. does not guarantee service on requested day [Current]Meter Number: 085346287N. Read1: 0000 [samuelr] [02/13/2019 02:46 PM] : CHECK METER HAS BEEN CHANGE METER NUMBER 269856 51 MIU 1551220074

Service

All

WORK ORD

- 03/01/19
- 02/14/19
- 02/12/19
- 02/07/19
- 02/05/19
- 01/28/19
- 08/24/18

Note

All [56]

Ison

Search

Service Orders

Service Order Details Notes

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(in gallons)
25000
20000
15000
10000
5000
0
-5000
-10000
-15000
-20000

Service
All

WORK ORD

- 03/01/19
- 02/14/19
- 02/12/19
- 02/07/19
- 02/05/19
- 01/28/19
- 08/24/18

Notes

All [56]

Brenda C Ison

[Redacted]

Customer Premier History

20 year

Move In: 09/29/99

210007633883 | 9120115059

1404 Saddle Club Way
Lexington
KY, US, 40504-1696



Primary Contact Information

Mailing Address:
1404 Saddle Club Way
Lexington
KY, US, 40504-1696

Primary Tel. Number :
[Redacted]

@Email:
[Redacted]

Brenda C Ison

[Redacted]

Customer Premise History

20 year

Move In: 09/29/99

210007633888 | 9120115059

1404 Saddle Club Way
Lexington
KY, US, 40504-1696



Primary Contact Information

Mailing Address:
1404 Saddle Club Way
Lexington
KY, US, 40504-1696

Primary Tel. Number :
[Redacted]

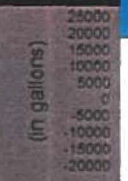
Email:
[Redacted]

Service Orders

Service Order Details Notes

1) Check Meter, Verify Serial #. Read current meter read shows estimated, please pick up current read and make any needed repairs or adjustments. thank you Special Handling has been requested for 03/04/2019 Customer notified that Spec. Handl. does not guarantee service on requested day

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Service
All

WORK ORD

- 03/01/19
- 02/14/19
- 02/12/19
- 02/07/19
- 02/05/19
- 01/28/19
- 08/24/18

Notes

All [56]