



LINDSEY W. INGRAM III
DIRECT DIAL: (859) 231-3982
DIRECT FAX: (859) 246-3672
L.Ingram@skofirm.com

300 WEST VINE STREET
SUITE 2100
LEXINGTON, KY 40507-1801
MAIN: (859) 231-3000
FAX: (859) 253-1093

February 13, 2020

HAND DELIVERED

Kent Chandler
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

RECEIVED

FEB 13 2020

PUBLIC SERVICE
COMMISSION

Re: Ison v. KAW, Case No. 2019-00093

Dear Ms. Pinson:

Enclosed please find Kentucky-American Water Company's Responses to the Commission Staff's Third 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

cc: Earl & Brenda Ison

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

Jasmine S. Mungo

Subscribed and sworn to before me, a Notary Public in and before said County and Commonwealth, this 13th day of February, 2020.

Sharon Miller (SEAL)

Notary Public

My Commission Expires:

7/25/2020

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

Witness: Jasmine S. Mungo

1. Refer to Kentucky-American's response to Complainants' Complaint (Response) in which Kentucky-American attached a Meter Test Form that indicates that the meter removed from the Ison's property had the required accuracy to pass the test.
 - a. Explain in full detail why the meter was scrapped if it passed the meter test.
 - b. Explain why the glass on the meter was cracked.
 - c. Explain what an RF device is, and why it was removed.
 - d. Explain why a data log was not possible.

Response:

- a. "Scrapped" is an inventory indicator in KAW's software system. "Scrapped" means that the meter will not be placed back in service. KAW is still in possession of the meter and states that it tested accurately. Currently KAW is not placing this type of meter back into the system.
- b. The glass could become cracked because of a manufacturer's defect, inadvertent damage, or even intentional tampering with the meter. Regardless of the case, KAW would not be able to explain how it occurred, only that it had occurred.
- c. The RF device, or radio frequency device, is attached to the meter and allows for radio reading. Often the RF device is removed during a meter change since it is not needed in order to bench test the meter for accuracy.
- d. The particular RF device in the field is what determines if a meter can be data logged or not. Depending on the RF device model and when it was installed, some can provide a data log and others cannot. In this particular case, the RF device was not one that had the capability of providing a data log.

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

Witness: Jasmine S. Mungo

2. Refer to Kentucky-American's Response in which Kentucky-American attached a Meter Information Form and placed a check mark next to "False Reading." Explain in full detail why this was marked if the water meter passed the meter test.

Response:

A check mark was placed next to "False Reading" because the reading recorded at the time of the meter change was not the same reading on the meter when the meter was inspected by KAW. The initially recorded "False Reading" does not influence the meter test.

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

Witness: Jasmine S. Mungo

3. Refer to 807 KAR 5:006, Section 7(5)(a), in which it states that each utility, except if prevented by reasons beyond its control, shall read customer meters at least quarterly. Explain whether Kentucky-American complied with this regulation in regard to the Ison's meter, and if not, explain why not.

Response:

An actual read occurred at least quarterly. In a previous response in this case (see KAW's July 25, 2019 response to PSC 1-1), the below chart was provided. This chart reflects the dates when the meter was read and the type of read (A= actual read, E= estimated read, and S= service order read.)

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	973	S	913

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Witness: Jasmine S. Mungo

4. Refer to 807 KAR 5:006, Section 7(5)(d), in which it states that if a utility is unable to read a meter then the utility shall record the date and time the attempt was made and the reason the utility was unable to read the meter. Explain whether Kentucky-American complied with this regulation, and provide all records regarding same.

Response:

KAW does record read attempts when meters are not able to be read. Set forth below is a chart reflecting the three estimated reads. The skip code: "Company Action Required" indicates a service order may be needed.

Please note, the estimated read on 11/26/2018 does not have a time recorded. If no skip code is entered on the day of a reading attempt, no time will be recorded.

Date	Time	Read	Type	Estimate Reason
7/23/2018	2:51AM	862	Estimated	Company Action Required
8/22/2018	10:21AM	863	Estimated	Company Action Required
11/26/2018	NA	869	Estimated	No read can be obtained