

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)

BENT TREE'S REQUESTS FOR INFORMATION TO KENTUCKY-AMERICAN
WATER COMPANY

Comes now the Complainant, Bent Tree Condominium Association ("Bent Tree"), by and through counsel, and submits these Initial Requests for Information to Kentucky-American Water Company ("KAWC" or "the Company") to be answered in accord with the following:

(1) Please identify the witness who will be prepared to answer questions concerning each request.

(2) Please repeat the question to which each response is intended to refer. Bent Tree can provide counsel for KAWC with an electronic version of these questions, upon request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(5) If you believe any request appears confusing, please request clarification directly from counsel for Bent Tree.

(6) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(7) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(8) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for Bent Tree as soon as possible.

(9) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all

letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all

handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(10) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(11) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(12) In the event a request for confirmation is asked and KAWC denies same, KAWC is instructed to provide a specific reason for the denial.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) Bent Tree reserves the right to pose additional preliminary data requests on or before any due date specified in a Commission procedural schedule.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dennis G. Howard, II". The signature is written in a cursive style with some stylized flourishes.

Dennis G. Howard, II
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**COUNSEL FOR BENT TREE
CONDOMINIUM ASSOCIATION**

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CASE NO. 2019-00133

1. The KAWC February 27, 2018 meter flow report does not indicate which meter was tested. (See Bent Tree Response to PSC Staff, DR-2, page A-2.) What is the meter number of the tested meter?
2. Please confirm the questions Mr. Marquette asked in his email dated March 5, 2018, to KAWC were never answered by the Company. (See Bent Tree Response to PSC Staff, DR-2, pages A-1 through A-15.)
3. Please confirm another new meter, number 83113560, was installed at the Kirklevington location later in February 2018.
 - a. Why was this done?
 - b. What functional capabilities did this meter have different than the prior one at the location? For example, could it read hourly?
 - c. If there were any different functional capabilities, were they conveyed by KAWC to Mr. Marquette?
4. Please confirm that Mr. Marquette, on behalf of Bent Tree, made its first appeals for help to KAWC in October 2017. If confirmed, please explain why KAWC did not respond at that time.
 - a. What is the date and time of Mr. Marquette's signature on the KAWC lobby registration at the time of his first visit to KAWC on Richmond road?
5. Please confirm that KAWC did not respond to Mr. Marquette for four weeks after his visit to KAWC in October 2017.
6. Please confirm that Mr. Marquette, on behalf of Bent Tree, contacted KAWC again on November 27, 2017, after hearing no response since October, with an appeal for assistance, including a request that KAWC holds put on bills.
 - a. Please confirm that KAWC stated it would test the meter but no date was given to Mr. Marquette.
 - b. What is the date and time of Mr. Marquette's signature on the KAWC lobby registration at the time of this visit?
7. Please confirm that Mr. Marquette did not receive a response from KAWC for another three weeks, specifically from November 29 until December 14, 2017.
8. Please confirm Mr. Marquette contacted KAWC again on December 14, 2017, asking about meter testing and was told KAWC had until Dec 29, 2017 to test the meters.

9. Please confirm KAWC did not contact Mr. Marquette again for seven and half weeks, specifically from December 14, 2017 until February 6, 2018.
10. Please confirm that on February 6, 2018, KAWC informed Bent Tree that both Kirklevington and Redding Road meters had been replaced with no explanation given.
11. Please confirm that Bent Tree was informed in person on site at Bent Tree by KAWC personnel on March 9, 2018 that hourly flow reports would be generated by KAWC personnel.
 - a. Please confirm that the reports, which were not shared in writing with Bent Tree, indicated that the suspected leak was on the Redding Road meter and not on the Kirklevington meter as previously stated by KAWC.
12. Please confirm that KAWC representative Joshua Riley subsequently informed Bent Tree on July 15, 2018 that the suspected leak was in fact on the Kirklevington meter and not on the Redding Road meter as KAWC had previously instructed Mr. Marquette on site on March 9, 2018.
13. Please confirm that 20 weeks, or approximately 5 months, passed between KAWC's confirmation on March 9, 2018, to Bent Tree that the suspected leak was on the Redding Road meter and KAWC's reversal of that instruction on July 25, 2018 that the suspected leak was indeed on the Kirklevington meter.
14. Please confirm Mr. Marquette requested in October 2017 that the Kirklevington Meter be tested.
 - a. Please confirm KAWC did not test the Kirklevington Meter until Feb 7, 2018.
 - b. Please confirm KAWC did not test the meters until after repeated requests to do so by Bent Tree.
15. Please confirm the Kirklevington meter number 060670947N was placed in service on or before 11-1-2016.
 - a. Please confirm the meter was still in service when the volumetric readings significantly increased.
 - b. Please confirm that meter number 060670947N was removed sometime in January/February 2018.
 - c. Please confirm meter number 060670947N was replaced with meter 060629350N.
 - d. Please confirm water billings associated with meter number meter 060629350N returned to a pattern of historical usage after meter 060670947N was removed.

CERTIFICATE OF SERVICE

I certify that this REQUESTS FOR INFORMATION is a true and accurate copy of the document being filed with the Commission in paper medium; that the individuals below were mailed a true and accurate copy of same; and that an original and ten copies of the filing in paper medium are being hand delivered to the Commission all on this 5th day of November 2019.



Dennis G. Howard, II

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COUNSEL FOR KENTUCKY-AMERICAN WATER COMPANY