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April 6, 2020

RECEIVED

APR 06 2020

PUBLIC SERVICE
COMMISSION

SUBMITTED ELECTRONICALLY

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

Re: Case No. 2019-00259, Shepherd v. Kentucky American Water

Dear Ms. Pinson:

Enclosed please find for filing Kentucky American Water's responses to Commission Staff's Second Request for Information in the above-referenced matter.

Very truly yours,

Lindsey W. Ingram III

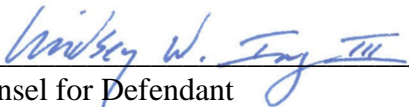
Enclosure

cc: Lowell Shepherd

CERTIFICATE OF SERVICE

This is to certify that the following responses to information requests have been provided to the Public Service Commission by electronic mail on April 6, 2020 and that a true and accurate copy of same has been served, via U.S. Mail, on the same day to the following:

Lowell DeWayne Shepherd
2298 Stonewood Lane
Lexington, KY 40509-4417

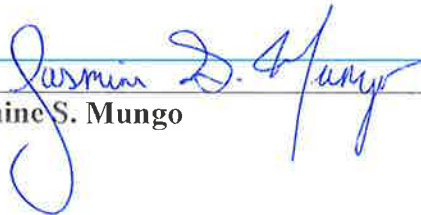


Counsel for Defendant

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 3rd day of April, 2020.

 (SEAL)

Notary Public

My Commission Expires:
7/25/2020

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2019-00259
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

Witness: Jasmine S. Mungo

1. Refer to Kentucky-American's Answer and Motion to Dismiss, Tab 2. The bill issued by Kentucky-American to Mr. Lowell DeWayne Shepherd (Mr. Shepherd) with a payment due by March 29, 2019, states that on February 27, 2019, the meter serving his property was removed and replaced with a new meter.
 - a. Explain in full detail whether Mr. Shepherd requested that the meter be replaced, or whether Kentucky-American replaced the meter on its own accord.
 - b. Provide a detailed explanation of the technical capabilities of Mr. Shepherd's new meter that was installed on February 27, 2019. Be sure to explain whether the new meter is capable of capturing exact monthly water usage.
 - c. Provide a detailed explanation of the technical capabilities of Mr. Shepherd's old meter that was replaced on February 27, 2019. Be sure to explain whether the old meter was capable of capturing exact monthly water usage.
 - d. State whether Kentucky-American was ever notified of a leak at Mr. Shepherd's premises.

Response:

- a. On February 21, 2019, Mr. Shepherd called to dispute the bill with a March 4, 2019 due date. As a result of his call, a service order was created to verify the meter reading. On February 25, 2019, during that scheduled service order, Kentucky-American personnel advised the customer that he could request to have the meter tested if he still wanted to dispute the bill. Mr. Shepherd then called to request a meter test. During that call, an order was created to change the meter on February 27, 2019 so it could be tested. The meter did pass the test at all three flows.
- b. Mr. Shepherd's new meter is capable of measuring water usage. The meter has a physical display (dial) of the meter reading and, with the attached Meter Interface Unit, or MIU, there is an added capability of transmitting those meter readings electronically. Additionally, this MIU is able to provide an hourly usage report (data log).
- c. Mr. Shepherd's old meter was capable of measuring water usage. The meter had a physical display (dial) of the meter reading and, with the attached Meter Interface Unit, or MIU, there is an added capability of transmitting those meter readings electronically. Additionally, this MIU was able to provide an hourly usage report (data log). Please note in this case the MIU for the old meter would not provide an hourly usage report.

Please see Kentucky-American's November 27, 2019 response to Item 2 of Commission Staff's First Request for Information explaining this.

- d. Kentucky-American has no record of being notified of a leak at Mr. Shepherd's premises.

KENTUCKY-AMERICAN WATER COMPANY
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2. Refer to Kentucky-American's Answer and Motion to Dismiss, Tab 2. The bill issued by Kentucky-American to Mr. Shepherd with a payment due by February 4, 2019, states that there was an estimated read of the meter for the service period of December 12, 2018, through January 13, 2019. Refer also to 807 KAR 5:006, Section 7(5)(d), which states that if, due to reasons beyond its control, a utility is unable to read a meter in accordance with this subsection, 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.
 - a. Explain in full detail why Kentucky-American did not perform an actual read of Mr. Shepherd's meter for the bill issued with a payment due by February 4, 2019.
 - b. Explain whether the estimated read of the meter for the bill with a payment due by February 4, 2019, could have impacted the next bill, which was the increased bill with a payment due by March 4, 2019.
 - c. As referenced above, provide the information as required by 807 KAR 5:006, Section 7(5)(d).

Response:

- a. On January 13, 2019, KAW obtained an actual read of 636 at 9:13 AM. This read showed a large increase in usage. When an actual read is provided that reflects a large increase in usage an attempt is made to verify the read. Until verification is provided the billing department uses an estimated read in order to send the bill out on time.
- b. The estimated read of the meter for the bill with a payment due by February 4, 2019, could indicate that some of the usage reported on the next bill, which was the increased bill with a payment due by March 4, 2019, had occurred previously on the bill with the due date of February 4, 2019. This does not however change the fact that the usage did occur.
- c. On January 13, 2019, KAW obtained an actual read of 636 at 9:13 AM. This read showed a large increase in usage. When an actual read is provided that reflects a large increase in usage an attempt is made to verify the read. Until verification is provided the billing department uses an estimated read in order to send the bill out on time. In this case a service order was created to verify the read. That order was not worked and expired. The next periodic meter reading of 640 was obtained on 2/11/2019 and was an actual read. This read confirmed the previous reading of 636. With that confirmation of usage, a bill was sent reflecting the actual verified usage.

**KENTUCKY-AMERICAN WATER COMPANY
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Witness: Jasmine S. Mungo

3. In Kentucky-American's current tariff, monthly consumption charges for all customers are measured in gallons. Explain whether Kentucky-American intends to replace meters that measure usage in cubic feet with newer meters that measure in gallons.

Response:

Kentucky American is purchasing new meters that measure usage in gallons. When the meters that measure in cubic feet reach the end of life cycle or when they malfunction, they are replaced with meters that measure usage in gallons. Additionally, all billing for Kentucky-American customers occurs in gallons. All customers that currently have a cubic feet meter have their consumption converted to gallons for billing purposes.

KENTUCKY-AMERICAN WATER COMPANY
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4. Explain whether Kentucky-American has offered a payment plan to Mr. Shepherd and provide the specific details of the same.

Response:

Mr. Shepherd was offered and placed on an installment plan in May 2019 and successfully completed the installment plan in January 2020. Installment plans spread the total account balance over a number of months, in this case nine, in order to make the payments more financially manageable to the customer. There is no interest associated with installment plans.