

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                 |   |            |
|---------------------------------|---|------------|
| ROBERT D. HOBODY                | ) |            |
|                                 | ) |            |
| COMPLAINANT                     | ) |            |
|                                 | ) |            |
| V.                              | ) | CASE NO.   |
|                                 | ) | 2020-00033 |
|                                 | ) |            |
| KENTUCKY-AMERICAN WATER COMPANY | ) |            |
|                                 | ) |            |
| DEFENDANT                       | ) |            |

COMMISSION STAFF'S INITIAL 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 the original and two copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due on within ten days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the 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 Kentucky-American 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, Kentucky-American 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. Explain whether a malfunctioning meter interface unit (MIU) can cause a false reading.
2. Explain in detail Kentucky-American's process for when an MIU fails to include what specifically the meter reader does when an MIU fails.
3. Explain whether Kentucky-American followed its own internal policies and procedures after learning that the MIU had failed and provide a copy of Kentucky-American's policies and procedures for when an MIU fails.

4. Explain whether Kentucky-American made a visual reading off of the register when the MIU failed and before removing the meter for testing. If so, provide the register reading(s).

5. Explain whether Kentucky-American verified the reading. If so, explain how Kentucky-American verified the reading.



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Kent A. Chandler  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED           **MAR 12 2020**          

cc: Parties of Record

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