



**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

March 23, 2020

**VIA E-MAIL ONLY**

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

*Re: Hobdy v. KAW, Case No. 2020-00033*

Dear Mr. Chandler:

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

Very truly yours,

A handwritten signature in blue ink, reading "Lindsey W. Ingram III".

Lindsey W. Ingram III

Enclosure

cc: Robert D. Hobdy

**RECEIVED**

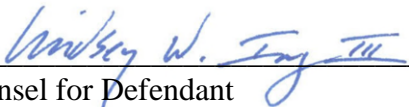
**MAR 23 2020**  
AH

**PUBLIC SERVICE  
COMMISSION**

**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 March 23, 2020 and that a true and accurate copy of same has been served, via U.S. Mail, on the same day to the following:

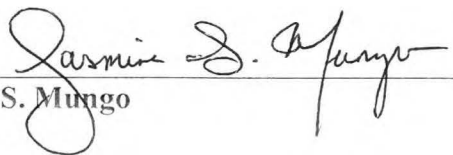
Robert Hobdy  
603 Ivy Court  
Lexington, KY 40505

  
\_\_\_\_\_  
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 19<sup>th</sup> day of March, 2020.

  
Notary Public

My Commission Expires:

2/28/2021



**KENTUCKY-AMERICAN WATER COMPANY**  
**CASE NO. 2020-00033**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

- 1.** Explain whether a malfunctioning meter interface unit (MIU) can cause a false reading.

**Response:**

A malfunctioning meter interface unit (MIU) which is also commonly called an “endpoint,” can, in some cases, cause a false meter reading to be received by a meter reader. However, even if a false reading occurs, the physical register on the meter itself still retains the actual usage amount and it is accurate if the physical meter is functioning properly and measuring accurately.

**KENTUCKY-AMERICAN WATER COMPANY**  
**CASE NO. 2020-00033**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

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.

**Response:**

When meter reading data is not received from an MIU the field employee will either locate the meter and read the meter manually or record a skip code in the system to indicate that no meter reading could be obtained.

**KENTUCKY-AMERICAN WATER COMPANY**  
**CASE NO. 2020-00033**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

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.

**Response:**

Kentucky-American followed its own internal policies and procedures after learning that the MIU had failed to provide a data log. In this case, the customer disputed the measured consumption based on the meter readings, so Kentucky-American attempted to pull a data log to provide additional information beyond what is typically provided. When the data log was not available, Kentucky-American changed the meter and tested it for accuracy. The disputed meter passed the meter test at all three flows

Kentucky-American does not have a written policy or procedure for MIU (also commonly called an "endpoint") failures, but the meter reader will troubleshoot the endpoint and look for different error codes or an indication that the battery may be getting weak. If there are error codes, Kentucky-American addresses the error code and replaces equipment if necessary to fix the situation. If the battery shows signs of weakness we will replace the endpoint and then the endpoint is scrapped for recycling due to the lithium battery.

**KENTUCKY-AMERICAN WATER COMPANY**  
**CASE NO. 2020-00033**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

- 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).

**Response:**

Kentucky-American completed a service order on December 26, 2019. The notes from that service order state that the meter reading was "309." This reading was verified, both electronically by reading equipment and visually on the meter register. Kentucky-American also completed a service order on January 01, 2020 and recorded a meter reading of "310." When meter number H012676594 was removed on January 7, 2020 for testing, a meter reading of "310" was recorded and later verified by Kentucky-American's meter shop technician.

**KENTUCKY-AMERICAN WATER COMPANY**  
**CASE NO. 2020-00033**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

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

**Response:**

Please see the response to PSC 1-4. A service order was completed on December 26, 2019. The notes from that order state that the meter reading was "309" and was verified both electronically by reading equipment and visually on the meter register. Additionally, Kentucky-American completed a meter change service order on January 7, 2020. The final meter reading was recorded as "310." The bench test that was performed on January 7, 2020 also records a meter reading of "310" and indicates that the meter was found to be accurately measuring water.