

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S SECOND 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 an electronic version of the following information. The information requested is due on March 18, 2022. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail at P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to PSCED@ky.gov. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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 that indicates 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. State whether or not the data log would notify Kentucky-American of high water usage during a billing cycle.
2. Explain how Kentucky-American uses the data obtained from a Meter Interface Unit (MIU).

3. State the date of the first meter reading done for the 11/16/2019 to 12/12/2019 billing cycle for the meter in question.

4. State the date of the meter re-read done for the 11/16/2019 to 12/12/2019 billing cycle for the meter in question.

5. Explain whether Kentucky-American has a systemic problem with malfunctioning MIU's.

6. State the number of MIU's that are malfunctioning in Kentucky-American's system for the most recent billing cycle.

7. Explain Kentucky-American's policy and plan for repairing non-registering meters.

8. Explain Kentucky-American's policy and plan for repairing malfunctioning MIU's.

Nancy Vinsel for

Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED MAR 04 2022

cc: Parties of Record

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