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March 18, 2022

***ELECTRONICALLY SUBMITTED BY E-MAIL***

Linda C. Bridwell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd  
Frankfort, KY 40601

**RECEIVED**

**MAR 21 2022**

**PUBLIC SERVICE  
COMMISSION**

*Re: Case No. 2020-00033, Hobdy v. Kentucky American Water*

Dear Ms. Bridwell:


Enclosed please find Kentucky American Water's submission in this non-electronic case. I hereby certify that: (1) the attached files are a true and accurate copy of the original documents in paper medium; (2) the attached files are being submitted to the Commission by electronic mail; and (3) a hard copy of these responses has been mailed to Mr. Hobdy at his address of record.

Very truly yours,

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

Enclosure

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF FAYETTE )

  
Roderick Sherman

Molly McChessee Van Over  
Notary Public

Notary ID: KYNP26988

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

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**Witness: Roderick Sherman**

1. State whether or not the data log would notify Kentucky-American of high water usage during a billing cycle.

**Response:**

No. A data log is not a tool for notifying Kentucky-American of high-water usage during a billing cycle.

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

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**Witness: Roderick Sherman**

2. Explain how Kentucky-American uses the data obtained from a Meter Interface Unit (MIU).

**Response:**

An endpoint (sometimes called an MIU) is merely the communication device by which usage data obtained from the meter itself is transmitted electronically to a Kentucky-American meter reader employee. The meter itself actually measures a customer's usage and the endpoint simply transmits that usage data to the meter reader. After that, the transmitted data is entered into Kentucky-American's billing system and a bill is generated. When a data log is obtained from an endpoint, Kentucky-American can see a record of previous water usage information at an hourly level. This information is used to help the customer better understand when water went through the meter.

As Kentucky-American said in its response to PSC 1-1 filed on March 23, 2020, "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." Thus, it is critical to understand that it is the *meter* that measures usage and that usage can be observed by viewing a meter's physical dial display without an endpoint or if the endpoint is not working properly. An endpoint merely allows a Kentucky-American meter reader to obtain the usage electronically without having to open a meter pit to view the meter's usage dial.

Kentucky-American removed the subject meter and tested it. It passed all accuracy tests as shown in the test results Kentucky-American provided in support of its February 21, 2020 Motion to Dismiss. Furthermore, on July 6, 2021, the Commission had the meter tested while this matter was pending. In its August 2, 2021 Order, the Commission stated that "the meter passed all accuracy requirements (see attached Appendix)."<sup>1</sup> The Commission also said:

Having reviewed the evidentiary record and being otherwise sufficiently advised, the Commission finds that because Mr. Hobdy is alleging that Kentucky-American overcharged him for water service and because the only evidence in the record indicates the meter in question has tested accurately, Mr. Hobdy should have until September 3, 2021, to submit additional evidence in support of his complaint.<sup>2</sup>

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<sup>1</sup> Case No. 2020-00033, August 2, 2021 Order, p. 2.

<sup>2</sup> Id.

Mr. Hobdy filed nothing in response to the Commission's August 2, 2021 Order. Therefore, this case should be dismissed as requested in Kentucky-American's Motion to Dismiss.

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

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**Witness: Roderick Sherman**

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.

**Response:**

For the above-referenced billing cycle, a periodic meter reading was obtained on November 15, 2019, and again on December 12, 2019.

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

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**Witness: Roderick Sherman**

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.

**Response:**

On December 13, 2019, a new customer meter reading was obtained. This reading was 308, verifying the previous periodic meter reading from December 12, 2019, of 308. This reading was used for the November 16, 2019 – December 12, 2019, billing cycle. Additionally, 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. On January 3, 2020, previously stated as January 1, 2020, which was incorrect by 2 days, Kentucky-American completed an additional service order and recorded a meter reading of 310. When meter H012676594 was removed on January 7, 2020, for testing, it was verified that the meter was functioning properly and reading accurately. The meter reading of 310 was recorded.

The chart below illustrates the meter reads for the specific meter, the dates of those reads and the reasons for the reads.

For meter #H012676594

Date	Reading	Reason
10/30/2019	270	Move-In
11/15/2019	271	Periodic
12/12/2019	308	Periodic
12/13/2019	308	Move-in
12/26/2019	309	Control Reading from service order
01/03/2020	310	Control Reading from service order
01/06/2020	310	Control Reading from service order
01/07/2020	310	Control Reading from service order. Meter pulled for meter test per customer request.

**KENTUCKY-AMERICAN WATER COMPANY**  
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**Witness: Roderick Sherman**

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

**Response:**

Kentucky-American does not have a systemic problem with MIUs or endpoints as they are commonly called (the ("Endpoint / MIU")).

There are several reasons why an Endpoint/ MIU will not transmit usage data to the meter reader that would not be considered or suggest a "malfunction," including weather and environmental variables, user error, intentional tampering, as well as temporary radio and/or physical interference. Properly operating Endpoints/ MIUs may also generate "Error Codes" to flag potential issues with either Endpoint/ MIU or meter such as high usage and back flow. Reasons that would be considered a "malfunction" include internal part degradation or failure, and battery failure prior to reaching life expectancy, that results in usage data not being transmitted to the meter reader.

Kentucky-American endeavors to timely inspect, repair, and replace as necessary Endpoints/ MIUs that fail to transmit usage data to minimize manual / estimated reading.

During the February 2022 meter read cycle, 4009 or 3.059% of Endpoints/ MIUs failed to successfully transmit usage data to the meter reader for a variety of reasons. This rate is generally consistent with meter reading expectations given meter length of service and service territory environmental conditions.



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**Witness: Roderick Sherman**

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

**Response:**

Please see Kentucky-American's response to Item No. 5 of these same data responses.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2020-00033  
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**Witness: Roderick Sherman**

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

**Response:**

When a meter is found to no longer register water consumption, it is taken out of service. If a meter is taken out of service because it is no longer registering water consumption, it would be replaced by a new meter and it would not be repaired or returned to service.

**KENTUCKY-AMERICAN WATER COMPANY**  
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**Witness: Roderick Sherman**

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

**Response:**

As previously stated in Kentucky-American's March 23, 2020 response to PSC 1-3, Kentucky-American does not have a written policy or procedure for MIU (also commonly called an "endpoint") failures. Kentucky-American's 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 remedy the situation. If the battery shows signs of weakness, Kentucky-American will replace the endpoint and then the endpoint is scrapped for recycling due to the lithium battery.

As previously stated in Kentucky-American's March 23, 2020 response to PSC 1-1 and as set forth in Item No. 2 of these responses, the meter continues to measure and report accurate water usage, regardless of the MIU transmitting information. The MIU plays no role in measuring water usage at the meter. The role of the MIU is to electronically transmit the information of the usage read by the meter.