

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF AMERICAN	)	
WATER WORKS COMPANY, KENTUCKY-	)	
AMERICAN WATER COMPANY, NEXUS	)	CASE NO.
REGULATED UTILITIES, LLC, AND WATER	)	2025-00171
SERVICE COMPANY OF KENTUCKY FOR	)	
APPROVAL OF THE TRANSFER OF CONTROL	)	
OF WATER SERVICE COMPANY OF KENTUCKY	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO WATER SERVICE COMPANY OF KENTUCKY

Water Service Company of Kentucky (Water Service Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 15, 2025. The Commission directs Water Service Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

Water Service Kentucky shall make timely amendment to any prior response if Water Service Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Water Service Kentucky fails or refuses to furnish all or part of the requested information, Water Service Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Water Service Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Joint Application, page 4, paragraph 9. It states that the Water Service Kentucky net utility plant value was \$7,757,458 as of December 31, 2024. Provide the current net utility plant for Water Service Kentucky.

2. Refer to Water Service Kentucky's response to Commission Staff's First Request for Information (Staff's First Request), Item 1(a). Provide the actual water loss

percentage for each month from June 2024 through June 2025, as well as the 12-month rolling average of water loss for each month during that same period.

3. Refer to Water Service Kentucky's response to Staff's First Request, Item 2. This response was not responsive. Provide the current amount and total number of customer deposits held.

4. Refer to Water Service Kentucky's response to Staff's First Request, Item 6. Explain how Water Service Kentucky will record the transfer of its equity interests to Kentucky-American Water Company (Kentucky-American) and state how Water Service Kentucky will record the close of its accounting books.

5. Refer to Water Service Kentucky's response to Staff's First Request, Item 9.  
a. Explain how the proposed transaction will provide Water Service Kentucky's current customers enhanced service quality.

b. State the improved resources and expertise that current Water Service employees will gain access to as a result of the proposed transactions.

6. Provide a list of all leaks repaired since January 2025 through June 2025 in the service territory. Include in the response the age and type of pipe, if applicable.

7. Individually, provide the feet of asbestos cement pipe, galvanized pipe, unlined cast iron pipe, and lead pipe currently serving Water Service Kentucky's customers in this service area by pipe type. If Water Service Kentucky has any of these types of pipes, provide a map and identify each type of pipe on the map of the service territory.

*Linda Bridwell RP*

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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED       JUL 7 2025      

cc: Parties of Record

Case No. 2025-00171

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