COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KURT AND LAYNE NETHERTON	
COMPLAINANTS V.	CASE NO.
KENTUCKY-AMERICAN WATER COMPANY) 2014-00141)
DEFENDANT)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO KURT AND LAYNE NETHERTON

Kurt Netherton and Layne Netherton (collectively "Complainants"), pursuant to 807 KAR 5:001, are to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 17, 2014. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness who will be 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 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.

Complainants shall make timely amendment to any prior response if they obtain 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 Complainants fail or refuse to furnish all or part of the requested information, Complainants shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should 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.

- 1. Provide all letters, e-mails and other written correspondence sent to and received from Kentucky-American Water Company ("Kentucky-American") that relate to the allegations of the Complaint.
- 2. Provide the date(s) and identify the content of any verbal communications you had with Kentucky-American that relate to the allegations of the Complaint.
- 3. Refer to the second paragraph of the second page in the Complaint. Provide all documentation that evidences your assertion that there are no leaks on the property.
- 4. Did you request Kentucky-American to conduct a meter test after receiving the bill dated January 8, 2014, for water usage from November 6, 2013, through December 5, 2013?

- 5. Did you request Kentucky-American to conduct a meter test after receiving the bill dated January 13, 2014, for water usage from December 6, 2013, through January 7, 2014?
- 6. Beginning with the bill you received on March 7, 2014, for water usage from January 8, 2014, through March 6, 2014, have your bills for water service at 3649 Winding Wood Lane, Lexington, Kentucky, been in line with your average daily usage as measured between May 4, 2013, when you moved into your residence, and November 5, 2013, which is the billing period immediately prior to the billing period in dispute?

Jeff/Derouen

Executive Director

Public/Service Commission

P.O. Box 615

Frankfort, KY 40602

	MAY	28	2014	
DATED				

cc: Parties of Record

Honorable Lindsey W Ingram, III Attorney at Law STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KENTUCKY 40507-1801

Kurt and Layne Netherton 3649 Winding Wood Lane Lexington, KENTUCKY 40515

Cheryl D Norton President Kentucky-American Water Company aka Kentucky 2300 Richmond Road Lexington, KY 40502