

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

NEEDHAM BETZ THOROUGHBREDS, INC.	)	
	)	
COMPLAINANT	)	
	)	CASE NO.
V.	)	2019-00373
	)	
KENTUCKY-AMERICAN WATER COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST 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 the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the individual responsible for responding to 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 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 it obtains 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 Kentucky-American fails or refuses to furnish all or part of the requested information, it 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. Provide copies of all documentation and correspondence by and between Kentucky-American and Needham Betz Thoroughbreds, Inc. (Needham Betz Thoroughbreds) in relation to the well that was dug by Needham Betz Thoroughbreds in 2015.

2. Explain whether Kentucky-American was notified by Needham Betz Thoroughbreds that they intended to dig a well and utilize the well as its main source of water.

3. Provide copies of all bills that Kentucky-American issued to Needham Betz Thoroughbreds for the calendar years of 2015, 2016, 2017, 2018, 2019, and to the present date.

4. Explain in full detail whether Kentucky-American conducted an investigation into why the water meter malfunctioned and did not allegedly accurately record usage from January 19, 2016, through March 30, 2019. If so, provide all of Kentucky-American's findings in that investigation.

5. In relation to the Monthly Billing Statement for the April 17, 2019 billing date, provide the calculations used to determine the Total Service Related Charges of \$6,744.92 and the Total Current Period Charges/Total Amount Due of \$7,563.22.

6. Refer to Kentucky-American's Answer and Motion to Dismiss, the April 18, 2019 correspondence attachment. In the correspondence, Kentucky-American states, "During a routine inspection, we found the water meter at this address was malfunctioning. As a result of our investigation, the water use was not properly recorded for 1,157 days from January 19, 2016 to March 30, 2019."

a. State the date of the routine inspection as referenced in the correspondence.

b. Provide copies of the results of the meter test from this inspection. If Kentucky-American is unable to provide the meter test from this inspection, provide an explanation as to why.

c. Explain whether the results of the meter test were provided to Needham Betz Thoroughbreds. If not, explain why not.

d. Explain whether Kentucky-American performed actual reads or estimated reads of Needham Betz Thoroughbreds' water meter during the period of January 19, 2016, through March 30, 2019.

7. Refer to Kentucky-American's Answer and Motion to Dismiss, the April 18, 2019 correspondence attachment. In the correspondence, Kentucky-American states, "Due to Kentucky American Water Regulations, you will only be back billed for 365 days from March 21, 2018 to March 20, 2019."

a. Explain in full detail what is meant by "[d]ue to Kentucky American Water Regulations, you will only be back billed for 365 days . . . ."

b. Identify the "Kentucky American Water Regulation" referred to in paragraph 7 above.

8. Refer to Kentucky-American's Answer and Motion to Dismiss, page 2, footnote 1. Kentucky-American states, "KAW only seeks payment of the last twelve months of that period in accordance with KAW's tariff." Explain in full detail what is meant by "KAW only seeks payment of the last twelve months of that period in accordance with KAW's tariff."

  
Kent A. Chandler  
Executive Director  
Public Service Commission  
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DATED FEB 10 2020

cc: Parties of Record

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