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October 21, 2019

RECEIVED

OCT 21 2019

PUBLIC SERVICE
COMMISSION

HAND DELIVERED

Gwen R. Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

Re: Ison v. KAW, Case No. 2019-00093

Dear Ms. Pinson:

Enclosed please find Kentucky-American Water Company's Responses to the Commission Staff's Second Request for Information in the above-referenced matter.

Very truly yours,

A handwritten signature in blue ink that reads "Lindsey W. Ingram III".

Lindsey W. Ingram III

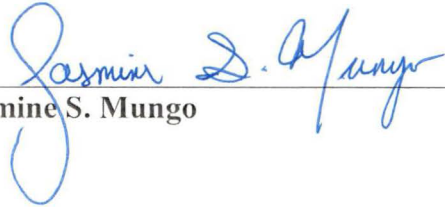
Enclosure

cc: Earl & Brenda Ison

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF FAYETTE)

The undersigned, **Jasmine S. Mungo**, being duly sworn, deposes and says she is the Manager, Customer Accounts for Kentucky-American Water Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.



Jasmine S. Mungo

Subscribed and sworn to before me, a Notary Public in and before said County and Commonwealth, this 18th day of October, 2019.



Notary Public (SEAL)

My Commission Expires:

7/25/2020

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2019-00093
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

Witness: Jasmine S. Mungo

1. Refer to Kentucky-American's response to Complainant's Complaint (Response) in which Kentucky-American states that the disputed amount is \$147.51, as shown on the attached bill dated February 22, 2019. Kentucky-American also states in its Response that "since KAW's investigation of this matter, billings based on the problematic radio equipment were cancelled, all billings have been based on the actual usage taken from both the old and new meters . . ." (emphasis added).¹ If Kentucky-American is claiming the disputed amount on the February 27, 2019 bill is taken from actual usage of both the old meter and the new meter installed on February 7, 2019, explain why the Billed Usage Graph on page three of the February 22, 2019 bill shows the amount of usage for February 2019 as an estimate, which would be the usage for the bill in question. Also, explain why the Billed Usage History Graph for March 26, 2019, and May 9, 2019, provided by Kentucky-American in its Response, continue to show this elevated February 2019 usage as an estimate.

Response:

Please see KAW's July 25, 2019 response to Item 1 of Commission Staff's First Request for Information for a general explanation of how and why, under certain circumstances, KAW is unable to obtain reliable actual customer usage, and, therefore, estimated amounts are used. That explanation also includes an explanation of how KAW can still obtain actual usage data from the meter itself after estimates were required to be used. To the extent it would be helpful to Commission Staff, KAW would gladly appear at the Commission for an informal conference to show any interested party the physical relationship and connection between a meter and a meter interface unit ("MIU") which is the device that electronically transmits usage measured at the meter to a KAW employee in a truck as he/she drives near the meter.

As to the question asked above regarding why an "E" for "estimate" is noted on page 3 of the February 22, 2019 bill, note that the bill consists of meter readings from both the old meter and the new meter installed on February 7, 2019. The reading from the old meter was taken directly from the meter itself making it actual. The reading from the new meter is shown as an estimate because the service order for that replacement work was not closed correctly in KAW's system. Thus, KAW's system generated an "E" for estimate. Please note that the actual portion of the bill makes up the vast majority of the usage indicated (21,692 of 24,092 gallons used). Any subsequent adjustment to that estimate would have been automatically reconciled via subsequent actual reads on the new meter as reflected in the subsequent bills attached to KAW's May 10, 2019

¹ Kentucky-American Water Company's Response to Complainant's Complaint at 2.

Response to Complainant's Complaint. Please also see KAW's July 25, 2019 Response to Item 1 of Commission Staff's First Request for Information.

As for why usage graphs on subsequent bills continued to show an estimate for February 2019, that is the case simply because there was, in fact, an estimate for part of February 2019 and the mere passage of time does not change the fact that there was an estimate made. It will always be reflected in KAW's system as an estimate.