



**LINDSEY W. INGRAM III**  
DIRECT DIAL: (859) 231-3982  
DIRECT FAX: (859) 246-3672  
L.Ingram@skofirm.com

300 WEST VINE STREET  
SUITE 2100  
LEXINGTON, KY 40507-1801  
MAIN: (859) 231-3000  
FAX: (859) 253-1093

October 21, 2019

RECEIVED

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PUBLIC SERVICE  
COMMISSION

**HAND DELIVERED**

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

Re: *Bent Tree v. KAW, Case No. 2019-00133*

Dear Ms. Pinson:

Enclosed please find Kentucky-American Water Company's Responses to the Commission Staff's First 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: Dennis G. Howard



**KENTUCKY-AMERICAN WATER COMPANY**  
**CASE NO. 2019-00133**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

1. Refer to Kentucky-American's Answer and Motion to Dismiss in which it admits the allegation in paragraph 16 of the Complaint that on February 6, 2018, it installed two new meters and began taking hourly readings.
  - a. Confirm that these new meters were installed at the Redding Road and Kirklevington Road locations.
  - b. State whether these meters are currently in place and serving Bent Tree Condominium Association. If not, state when the meters installed on February 6, 2018, were replaced.

**Response:**

- a. Yes, two meters were installed on 02/06/2018 for Bent Tree with a service address of 401 Redding Rd Lexington KY 40517. Due to this address being located on a corner, one meter does sit on Redding Rd and the other on Kirklevington Rd.
- b. Yes, the two meters installed on 02/06/2018 are still currently installed for this customer.

**KENTUCKY-AMERICAN WATER COMPANY  
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2. State whether the meters installed on February 6, 2018, were ever tested for accuracy and if so, provide the test results. Provide an identification on the test results for which meter is being tested.

**Response:**

The meters were tested for accuracy by the manufacturer before they were placed in service. Those test results are typically sent in Excel files for numerous meters by the manufacturer as they are purchased by Kentucky American Water. The test results for the two meters in question are set forth below in an excerpt from an Excel file provided by the manufacturer.

Order Number	Line Number	Part Number	Description	Manufacture Date	Serial Number	Customer Register ID	Customer Badge Number	Low	Mid	High	Ship Date
440531	3	C217XXXG1DA0X	MTR 2 OMNI C2 MNCS/TURB NICOR 1GAL PULSE 100G 6WHL3A AMR 25'NICOR MFG SN=REG ID	5/12/2017	83113560	83113560		98.2	99.7	100.3	5/15/2017
440531	3	C217XXXG1DA0X	MTR 2 OMNI C2 MNCS/TURB NICOR 1GAL PULSE 100G 6WHL3A AMR 25'NICOR MFG SN=REG ID	5/12/2017	83113574	83113574		100.5	99.9	99.5	5/15/2017

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3. State whether any in-person meetings took place between the parties to attempt to settle the billing issue. If such meetings did occur, give the date of the meeting and provide any notes, agendas, or other written records from such meetings.

**Response:**

A meeting occurred between the parties at Kentucky American Water's offices at 2300 Richmond Road in Lexington, Kentucky on 09/19/2018. No specific notes or agendas were created. However, Bent Tree's July 8, 2019 Response to Item No. 2 of Commission Staff's First Request for Information discloses various e-mails exchanged prior to the meeting (for example, see page 117 of the attachment to Item No. 2 provided by Bent Tree). Additionally, counsel for the parties engaged in settlement discussions after the case was filed as reflected in the e-mails attached at pages 336-341 of the attachment to Item No. 2 of Bent Tree's Response to Commission Staff's First Request for Information.