



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 Kentucky-American obtains information that indicates 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, Kentucky-American 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.

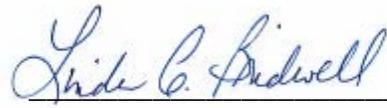
1. Refer to Kentucky-American's response to Commission Staff's First Request for Information (Staff's First Request), Item 6(a). Explain in specific detail what Kentucky-American means by a "stuck meter" and how this was determined given that the meter was not tested.

2. Refer to Kentucky-American's response to Staff's First Request, Item 6(c), which states that Kentucky-American conducted actual meter reads using Kentucky-American's Automated Meter Reading (AMR) system between January 18, 2016, through March 18, 2019. Explain why Needham Betz Thoroughbreds would owe Kentucky-American for any past water usage if Needham Betz Thoroughbreds' bills were based upon an actual meter reading by RF device between January 18, 2016, and March 18, 2019.

3. Refer to Kentucky-American's response to Staff's First Request, Item 6(b), in which Kentucky-American admits that it did not test the customer's meter, and Item 7(b). Explain why Needham Betz Thoroughbreds would owe Kentucky-American for any past water usage pursuant to Kentucky-American's Tariff No. 3.2(d) if Needham Betz Thoroughbreds' meter was not tested.

4. Refer to Kentucky-American's Tariff Sheet No. 13, 6.1(j) regarding monitoring of customer usage on a monthly basis for unusual deviation from historical usage. Provide the number of times Kentucky-American identified Needham Betz Thoroughbreds' water usage as an unusual deviation from historical usage and provide documentation of Kentucky-American's notice to Needham Betz Thoroughbreds and steps taken to determine the reason for the unusual deviation.

5. Provide a calculation of the estimated bill for Needham Betz Thoroughbreds' water usage between January 19, 2016, and March 30, 2019, based upon Needham Betz Thoroughbreds' average water usage between August 19, 2015, and January 18, 2016.



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DATED JUL 12 2021

cc: Parties of Record

Case No. 2019-00373

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