

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF KENTUCKY-)	
AMERICAN WATER COMPANY'S ALLEGED)	CASE NO.
VIOLATION OF A TARIFF AND COMMISSION)	2022-00299
REGULATIONS REGARDING METERS AND)	
MONITORING CUSTOMER USAGE)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO KENTUCKY-AMERICAN WATER COMPANY

Kentucky-American Water Company (Kentucky-American), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on May 25, 2023. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness 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 the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the article "Lexington Residents, Did Your Water Bill Spike Last Month? Here's Why and What to Do" that appeared on the *Lexington Herald Leader* website on February 22, 2022.²

² Aaron Mudd, "Lexington Residents, Did Your Water Bill Spike Last Month? Here's Why and What to Do", <https://www.kentucky.com/news/know-your-kentucky/article272085972.html> (accessed May 3, 2023).

a. Provide the number of customers who received an inaccurate bill in December 2022 and January 2023.

b. Refer to the experience of Ms. Susan Owens, who was quoted in the article. Explain what caused Ms. Owens bill issue, what was done to correct the bill issue, and how long it took to correct the bill issue.

2. Refer to the *Lexington Herald-Leader* article referenced in Item 1. Explain the “system issue” that caused a delay in the December 2022 bills.

a. Provide the number of customers whose bills were affected by the “system issue.”

b. Provide the steps Kentucky-American has taken to ensure the “system issue” does not occur again.

3. Refer to the *Lexington Herald-Leader* article referenced in Item 1.

a. State why the “re-routing project to improve efficiency” was needed.

b. Provide the number of customers whose bills were affected by the re-routing.

c. Provide how and when customers were notified of the re-routing.

4. Refer to the *Lexington Herald-Leader* article referenced in Item 1. State how many burst pipes in December 2022 caused higher than normal bills for customers and how many customers were affected by each burst pipe.

5. Provide the approximate number of Kentucky-American customers that were overbilled in December 2022 and January 2023.

6. Please identify the number of residential customers, by month, between October 2022 and March 2023 that had a billed usage of 50 percent or more of average

usage for a single month during that period. In an Excel spreadsheet, provide a listing of the customer addresses, with the corresponding previous 12-month average, the percentage amount above the average, and the following month's billing. Identify if the customer was part of the "system issue" that caused a delay in billing in December 2022. Additionally, identify if the meter was subsequently tested or replaced.

7. Refer to Kentucky-American's Response to the Attorney General's First Request for Information (Attorney General's First Request), Item 20.

a. Reconcile the number of meter manufacturers listed in the response with the number of meter manufacturers provided in Case No. 2023-00030, Kentucky-American's Response to Commission Staff's First Request for Information, Item 2, Confidential Filing Attachment A.³

b. Explain why Kentucky-American tested only meters from two manufacturers.

c. Explain how many meters were tested and the formula Kentucky American used to arrive at the stated percentages.

d. Provide a detailed description as to how the testing was done and by whom the testing was done.

8. Provide the number of meters of each make and model in use by Kentucky-American.

³ Case No. 2023-00030, *Electronic Application of Kentucky-American Water Company to Amend Tariff to Revise Qualified Infrastructure Charge* (filed May 1, 2023).

9. Refer to the Alena Williams informal complaint in the Appendix of the May 17, 2023 Order. State why it took two years to determine there was water being used at an address that did not have an active account.

10. Refer to the Jason Barrett informal complaint in the Appendix of the May 17, 2023 Order. State why Mr. Barrett had estimated reads for three consecutive months.

11. Refer to the Taylor Bartruff informal complaint in the Appendix of the May 17, 2023 Order. Kentucky-American confirmed there was a leak after meter testing. State why Kentucky-American did not make a leak adjustment on Mr. Bartruff's bill.

12. Refer to the Sarah Thornton informal complaint in the Appendix of the May 17, 2023 Order. Explain what malfunction of the meter occurred due to cold weather. State why Ms. Thornton's bill could not be adjusted because of a malfunctioning meter.

13. Refer to the Steve Houston informal complaint in the Appendix of the May 17, 2023 Order. Mr. Houston requested a meter change in November 2022. State why as of March 20, 2023, Mr. Houston's meter had not been replaced.



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DATED MAY 17 2023

cc: Parties of Record

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