

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-)	
AMERICAN WATER COMPANY FOR A)	CASE NO.
BALANCING ADJUSTMENT FOR ITS QIP)	2022-00328
CHARGE)	

COMMISSION STAFF'S SECOND 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 an electronic version of the following information. The information requested is due on December 5, 2022. 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 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 1, Excel Workbook: KAW_R_PSCDR1_NUM001_110722_Attachment_A.xlsx. Using the same table format, provide the removals and retirement amounts that Kentucky-American did not identify in its original response.

2. Refer to Kentucky-American's response to Staff's First Request, Item 2. The information provided is unresponsive. Provide the information comparatively with the

original 2018 table, after QIP Year 1, after QIP Year 2, and an updated total including Non-QIP amounts.

3. Refer to Kentucky-American's response to Staff's First Request, Item 2.
 - a. Provide the information produced in the original table for the North Middletown service territory.
 - b. Provide the information produced in the original table for the Eastern Rockcastle service territory.
 - c. In Case No. 2018-00358, Kentucky-American stated that it would prioritize the replacement of cast iron and galvanized steel mains, which represented 15 percent of its distribution system but accounted for 64.2 percent of the annual main breaks.² Provide a detailed explanation as to why cast iron and galvanized steel mains only accounted for 15.86³ percent of the miles of mains replaced through October 2022 while ductile iron mains accounted for 41.73 percent⁴ of the mains replaced.
 - d. Provide a detailed explanation as to why galvanized steel mains only accounted for 0.14 percent⁵ of the mains replaced through October 2022.

² Case No. 2018-00358, *Electronic Application of Kentucky-American Water Company for an Adjustment of Rates* (filed June 27, 2019), Direct Testimony of Elaine K. Chambers at 6:11-14 and Exhibit 1.

³ 360.9 (Cast Iron Mains) + 326.9 (Asbestos Cement Mains) + 564.8 (PVC/Plastic Mains) + 958.3 (Ductile Iron Mains) + 3.3 (Galvanized Steel Mains) + 17.1 (Concrete/Cement Mains) + 65.3 (Other Mains) = 2,296.6 (Total Mains Replaced); 360.9 (Cast Iron Mains) + 3.3 (Galvanized Steel Mains) = 364.2 (Cast Iron and Galvanized Steel Mains) ÷ 2,296.6 (Total Mains Replaced) = 15.86%.

⁴ 958.3 (Ductile Iron Mains) ÷ 2,296.6 (Total Mains Replaced) = 41.73%.

⁵ 3.3 (Galvanized Steel Mains) ÷ 2,296.6 (Total Mains Replaced) = 0.14%.



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DATED NOV 21 2022

cc: Parties of Record

Case No. 2022-00328

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