

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF THE CITY OF	)	
LIVINGSTON AND KENTUCKY-AMERICAN	)	CASE NO.
WATER COMPANY FOR THE TRANSFER OF	)	2025-00364
CONTROL AND ASSETS	)	

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

Kentucky-American Water Company (Kentucky-American), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on January 6, 2026. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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 5:001, 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 2.

- a. Explain Kentucky-American's understanding, following the conversation with the Kentucky Division of Water (DOW), of the current outstanding violations related to the city of Livingston's (Livingston) water system, and the steps that will need to be taken by Kentucky-American to address those violations so to achieve

compliance with all DOW regulations upon the proposed purchase of Livingston. Include a timeline of any remedial steps that will be taken and identify the entity expected to perform the work.

2. Refer to KAW\_R\_PSCDR1\_NUM002\_120825\_Attachment.pdf, page 149, email dated December 1, 2025, from Alexis Sulfridge. Explain whether Kentucky-American has had any conversation with Livingston officials or received an update concerning the referenced potential funds for the tank repair or replacement of the altitude meter.

3. Refer to Kentucky-American's response to Staff's First Request, Item 4. Consider this an on-going request to supplement the requested schedules as Kentucky-American completes them.

4. Refer to Kentucky-American's response to Staff's First Request, Item 12, KAW\_R\_PSCDR1\_NUM012\_120825\_Attachment.pdf, Attachment 1. Provide the attachment in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

5. Refer to Kentucky-American's response to Staff's First Request, Item 8. Refer also to Kentucky-American's response to Staff's First Request, Item 12, KAW\_R\_PSCDR1\_NUM012\_120825\_Attachment.pdf, Attachment 1.

a. Confirm that all of the assets listed in KAW\_R\_PSCDR1\_NUM012\_120825\_Attachment.pdf, Attachment 1 comprise the entirety of Livingston's water system assets to be acquired. If not confirmed, explain the response.

b. If the response to subpart (a) is not confirmed, confirm that the purchase price of \$400,000 will not change as a result of the additions to the acquired assets.

6. Refer to Kentucky-American's response to Staff's First Request, Item 23. Provide the number of mains to be replaced each year, pursuant to the amount of expenditures required, and the percentage/portion of the current Livingston water system the cumulative proposed amount of expenditures represents.

7. Refer to Kentucky-American's response to Staff's First Request, Item 12. In the pending application for a Certificate of Public Convenience and Necessity (CPCN) in Case No. 2025-00240,<sup>2</sup> Kentucky-American has claimed the average life of meters is ten years. KAW\_R\_PSCDR1\_NUM012\_120825\_Attachment 1, page 1 shows an assumed installation date of 2000 for Livingston's meters. Confirm if Kentucky-American plans to replace the current Livingston system's meters with the Advanced Metering Infrastructure (AMI) meters in 2026 if the CPCN is approved in Case No. 2025-00240.

8. Refer to Livingston's response to Staff's First Request, Item 5(A) stating current water loss is 39 percent for 2025.

a. Explain if Kentucky-American has an immediate plan of action to address the 39 percent water loss in the Livingston system within the first 90 days of ownership.

b. Refer also to Kentucky-American's response to Staff's First Request, Item 23. Explain if the committed \$600,000 capital investment is sufficient to reduce the

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<sup>2</sup> Case No. 2025-00240, *Electronic Application of Kentucky-American Water Company for a Certificate of Public Convenience and Necessity for Installation of Advanced Metering Infrastructure* (filed July 10, 2025).

current Livingston system's water loss to Kentucky-American's system average of approximately 18 percent or will additional funds be required.

8. Refer to Kentucky-American's response to Staff's First Request, Item 16 and Livingston's response to Staff's First Request, Item 9, both confirming no Livingston employees will be retained.

a. Explain how Kentucky-American operations staff will locate valves, meters, and flush points without receiving any institutional knowledge from current staff since the system has "non-standard locations" for meters (per Due Diligence Report) and lacks GIS data.

b. Explain if Kentucky-American secured an agreement with the current part-time operator mentioned in the Due Diligence Report to provide transitional consulting services.

9. Refer to Kentucky-American's response to Staff's First Request, Item 18, stating the acquisition eliminates Livingston as a separate utility. Explain how Livingston will bill for its sewer charges after the proposed acquisition since Kentucky-American is not acquiring the wastewater system.



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DATED **DEC 17 2025**

cc: Parties of Record

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