

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ADJUSTMENT OF THE)
RATES OF KENTUCKY-) CASE NO. 2008-00427
AMERICAN WATER COMPANY)

**CAC'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY-AMERICAN WATER COMPANY**

Comes now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and hereby serves the following request for information on Kentucky-American Water Company:

1. How many Kentucky American Water Company residential accounts were shut off for non-payment in each year 2004, 2005, 2006, and 2007? Please break down your answer by month and county.
2. How many Kentucky American Water Company residential accounts were shut off for non-payment in the time period 1/1/2008 through the latest date in 2008 where records are available? Please break down your answer by month and county.
3. In the event you are not able to break down your answers to Request Nos. 1 and 2 by month, how many Kentucky American Water Company residential accounts were shut off for non-payment in the time period 12/1/2007 through 11/30/2008?
4. In the event you are not able to break down your answer to Request No. 1 by month, how many Kentucky American Water Company residential accounts were shut off for non-payment in the time period 12/1/2006 through 11/30/2007?

5. In the event you are not able to break down your answer to Request No. 1 by month, how many Kentucky American Water Company residential accounts were shut off for non-payment in the time period 12/1/2005 through 11/30/2006?
6. In the event you are not able to break down your answer to Request No. 1 by month, how many Kentucky American Water Company residential accounts were shut off for non-payment in the time period 12/1/2004 through 11/30/2005?
7. How many Kentucky American Water Company residential accounts were shut off for non-payment in the time period 12/1/2003 through 11/30/2004? Please break down your answer by month and county.
8. How many Kentucky American Water residential accounts received benefits through the Help To Others program or its predecessor Water for Life in each year 2004, 2005, 2006, 2007, and through the latest date in 2008 where records are available? Please break down your answer by month and county.
9. What is the total amount of funding Kentucky American Water has contributed in each year 2004, 2005, 2006, 2007, and 2008 to programs that directly assist its customers who have difficulty paying their bills?
10. How much have Kentucky American Water ratepayers, through voluntary donations given through billing statements, contributed to the Help To Others program or its predecessor Water for Life in each year 2004, 2005, 2006, 2007, and 2008?
11. How many Kentucky American Water ratepayers, through voluntary donations given through billing statements, contributed to the Help To Others program or its predecessor Water for Life in each year 2004, 2005, 2006, 2007, and 2008?

12. Please provide a list of Kentucky counties in which Kentucky American Water provides service and the number of residential customers in each of those counties.
13. What is the current, average, total monthly cost for residential customers in Fayette County? What is the current, average, total monthly cost for all residential customers of Kentucky American Water, broken down by county? In each case, the average should exclude accounts with no actual water usage.
14. Based on the requested residential rate increase, what will be the real dollar annual increase for the average Fayette County residential customer? Based on the requested residential rate increase, what will be the real dollar annual increase for the average residential customer, in counties other than Fayette, broken down by county?
15. Based on the requested residential rate increase, what will be the real dollar annual increase for the average Kentucky American Water residential customer across the Company's entire service area?
16. Assuming approval of the requested residential rate increase, what will be the estimated average, total monthly cost for residential customers in Fayette County? Assuming approval of the requested residential rate increase, what will be the estimated average, total monthly cost for residential customers in counties other than Fayette, broken down by county? This average should exclude accounts with no actual water usage.
17. Assuming approval of the requested residential rate increase, what will be the estimated average, total monthly cost for all Kentucky American Water residential

customers across the Company's entire service area? This average should exclude accounts with no actual water usage.

/s/ Joe F. Childers
JOE F. CHILDERS

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**ATTORNEY FOR COMMUNITY
ACTION COUNCIL FOR
LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS
COUNTIES, INC.**

CERTIFICATE OF SERVICE

In accordance with Ordering Paragraph No. 5 of the Commission's October 30, 2008 Order, this is to certify that CAC's December 17, 2008 electronic filing of this Data Request is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on December 17, 2008; that an original and one copy of the filing will be mailed to the Commission on December 17, 2008; that, on December 17, 2008, notification of the electronic filing will be provided to the Commission and the following via electronic mail:

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