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April 27, 2010

HAND DELIVERED AND ELECTRONICALLY FILED

Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Re: Case No. 2009-00253

Dear Mr. Derouen:

I write to make two requests of Commission Staff in the above-referenced matter (the case involves Kentucky American Water's ("KAW") request for a deviation from the water meter replacement regulation). There are no intervenors.

On April 22, 2010, Commission Staff issued a data request and requested that KAW file responses by April 30, 2010. First, for several reasons, we request an extension of at least four weeks to answer the data requests. KAW is in the midst of a general rate case (2010-00036), and responses to several parties' data requests are due on April 30. The request for the deviation in 2009-00253 has been pending for well over a year, and there has been no movement in the docket since last summer. Consequently, to KAW's knowledge, an expedited discovery schedule is unnecessary. Additionally, the data requests are quite extensive and broad. They ask for a wide range of information, from detailed data about specific meters spanning back a decade to nationwide information about how other state utility regulators have dealt with similar requests. Gathering the information will be an expensive and lengthy process that cannot be completed by the end of this month.


Second, KAW requests an informal conference in this case early in May to discuss the details of the data request. We are currently researching what information we already have that is responsive to the questions and what would be required in terms of time and expense to retrieve that information. However, we would like an opportunity to ask the reasons for some of the questions so we can determine how we should proceed with our efforts.

Thank you very much for your consideration of these requests. Given the current due date on the data request, we would appreciate a response as soon as possible.

Jeff Derouen
April 27, 2010
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Very truly yours,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink that reads "Lindsey W. Ingram III". The signature is written in a cursive style with a prominent "L" and "I".

Lindsey W. Ingram III

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