

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2010-00036
COMMUNITY ACTION COUNCIL'S SECOND REQUEST FOR INFORMATION

Witness: Michael A. Miller

1. Does the Company keep records of which and/or how many of its residential accounts are paid late? If not, why not?

Response:

The Company believes its response to CAC-1-2 was responsive to this question and renews its objection rendered in CAC-1-2 to this request. In addition, the Company objects to this question on the grounds that KAW does not have a late payment penalty tariff and the information is not relevant to this proceeding. Notwithstanding the objection, the Company's accounts receivable file has the payment date and the billing file has the billing date. The Company would have to perform extensive analysis and merger of both files for each customer, for each month for the five year period. The Company does not currently have a report requested in the format requested and it would be unduly burdensome and costly to pay the programming and labor required to generate such a report. The CAC goes on to ask for this data to be by county, zip code and census track. This additional information would add even more programming and labor costs to generate a report breaking it down in this fashion, although census track is not a field the Company maintains.

For the electronic version of this response, refer to KAW_R_CACDR2#1_052810.pdf.

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2. If the answer to Question 1 is yes, please describe how they are kept, if they are kept by county or other location and/or annually, monthly or by other time period, and in what format they are kept, and elaborate as to why it would be "extremely burdensome" to provide CAC with responses to Questions 2, 4, and 15 from its Initial Request for Information.

Response:

Please see the response to CAC-2-1.

For the electronic version of this response, refer to KAW_R_CACDR2#2_052810.pdf.

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3. If the Company keeps records of late payment information for its residential customers described in Questions 1 and 2, please provide that information in the format in which it is kept for the years 2005, 2006, 2007, 2008, 2009, and 2010. If possible, please provide an electronic copy of this information in spreadsheet format such as Microsoft Excel.

Response:

Please see the response to CAC-2-1.

For the electronic version of this response, refer to KAW_R_CACDR2#3_052810.pdf.

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4. Does the Company keep records of how many and/or the amount of late payment fees it has assessed on its residential customers and/or records of how many of its residential customers have been assessed late fees? If yes, please describe how they are kept, if they are kept by county or other location and/or annually, monthly, or by other time period, and in what format they are kept.

Response:

The Company does not have a late payment fee in its tariffs, and, therefore, does not charge late payment fees.

For the electronic version, refer to KAW_R_CACDR2#4_052810.pdf.

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5. If the answer to Question 4 is yes, please provide these records in the format in which they are kept for the years 2005, 2006, 2007, 2008, 2009 and 2010, and if possible break the information down by county, zip code, or census tract.

Response:

See the response to CAC-2-4.

For the electronic version of this response, refer to KAW_R_CACDR2#5_052810.pdf.

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6. How many Kentucky American Water Company residential accounts received benefits from any third-party assistance program, such as "Help to Others," in each year 2005, 2006, 2007, 2008, 2009 and to date in 2010? Please provide the data by third-party assistance program if possible.

Response:

The Company believes its response to CAC-1-5 was responsive to this question and renews its objection offered in that response. Notwithstanding the objection, other than the "Help to Others" program, KAW does not have records as to which, if any, other customer assistance programs its customers may have received. As stated in CAC-1-5, KAW is provided reports from CAC about customers that have been cleared for assistance through the "Help for Others" program. Those reports are the information on which KAW would have to rely to respond to this question.

For the electronic version of this response, refer to KAW_R_CACDR2#6_052810.pdf.