

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ADJUSTMENT OF RATES OF KENTUCKY-)
AMERICAN WATER COMPANY) CASE NO. 2010-00036

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S SUPPLEMENTAL REQUESTS FOR INFORMATION**

Comes now the Lexington-Fayette Urban County Government ("Lexington"), by counsel and pursuant to the Public Service Commission's Scheduling Order, and submits its Supplemental Requests for Information to Kentucky-American Water Company ("KAWC") to be answered in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from legal counsel for Lexington.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify legal counsel for Lexington as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

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1. See Responses to Lexington's Initial Requests for Information 9, 10, 11, and 17. Given that the actual number of hydrants already in use exceeds the number of hydrants used for the test year, and that there are a significant number of hydrants projected to be added into the system during the test year, how can KAWC claim that it used a 13 month average to come up with the appropriate number of hydrants?

a. Based upon the above, what is KAWC's position on the appropriate number of hydrants that should be used for the test year and why?

b. Please provide a revised Schedule A to Exhibit 36 that reflects any change(s).

c. Do you agree that the proposed increase for public fire service is decreased if additional hydrants are included in the above analysis?

d. Is KAWC willing to decrease the amount of its requested proposed increase to public fire service to reflect the above? If not, why?

2. See Response to Lexington's Initial Request for Information 2. The account information appears to include other accounts which include "Lexington" in their name other than the Lexington-Fayette Urban County Government. Please verify that Lexington is not currently being billed for any of these other named accounts.

3. Please verify that fire hydrants are billed on a monthly pro rata basis based upon the date of their installation or removal. If not, please explain.

4. Please list all of the tariffs applicable to the use of consumption of water in Fayette County for which KAWC does not currently pay Lexington a franchise fee.

5. Please provide all of the documents related Lexington's Initial Requests for Information 4 and 5.

6. Please provide a list of all of the ratepayers located in the Central Division (other than Lexington) who pay for any public fire hydrants.

7. When does KAWC anticipate that it will be able to provide maintenance and testing information pertaining to its public fire hydrants to Lexington in an electronic format?

8. When does KAWC anticipate that it will be able to provide electronic billing information to Lexington and other major customers?

9. Have all of the public fire hydrants been repainted in compliance with NFPA standards regarding color codes? If not, when does KAWC anticipate that this will be done?

a. How timely is a public fire hydrant repainted in the event that its flow testing results require a change in color code?

10. Please explain in detail the process that KAWC utilized to select the contractors for the construction of the new treatment plant and related pipeline. Were all of the selected contractors the lowest bidder for each respective segment of the work? If not please explain why and provide the difference between the amount of the selected contractor and the lowest bidder. Please provide all of the documents related to this request.

Respectfully submitted,

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FILING NOTICE AND CERTIFICATE

In accordance with Ordering Paragraph No. 5 of the Commission's February 16, 2010 Order, this is to certify that Lexington-Fayette Urban County Government's May 14, 2010 electronic filing of these data requests 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 May 14, 2010; that an original and one copy of the filing will be delivered to the Commission on May 14, 2010; and that, on May 14, 2010, notification of the electronic filing will be provided to the Commission and the following via electronic mail:

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