

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY-AMERICAN )  
WATER COMPANY FOR AN ADJUSTMENT OF ) CASE NO. 2012-00520  
RATES SUPPORTED BY A FULLY FORECASTED )  
TEST YEAR )

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S SUPPLEMENTAL REQUESTS FOR INFORMATION  
TO THE KENTUCKY-AMERICAN WATER COMPANY**

Comes now the Lexington-Fayette Urban County Government ("Lexington"), by counsel and pursuant to the Public Service Commission's Scheduling Order of January 22, 2013, and submits its Supplemental Requests for Information to the 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 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 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.

WHEREFORE, the Lexington-Fayette Urban County Government submits this Supplemental Requests for Information.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN  
COUNTY GOVERNMENT  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507  
(859) 258-3500

BY:



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NOTICE AND CERTIFICATION

Pursuant to the Commission's December 17, 2012 Order of Procedure, the Lexington-Fayette Urban County Government undersigned counsel certifies that: (a) the electronically filed documents are a true and accurate copy of each paper document which has been mailed on this date for filing with the Commission, (b) the electronic version of the filing has been transmitted to the Commission, (c) because no party has been excused from participating electronically no paper copies were mailed, and (d) the parties of record have been served electronically.



BY:

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David J. Barberie

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

1. Please refer to your response to Lexington's Initial Requests for Information No. 7. Are there 107 or 116 KAW employees working in Lexington?
2. Please refer to your response to Lexington's Initial Requests for Information No. 10(c). How many of the 47 additional hydrants are/will be billed to Lexington?
3. Please refer to your response to Lexington's Initial Requests for Information No. 11(b). Please identify which of these hydrants are billed to Lexington.
4. Please refer to your response to Lexington's Initial Requests for Information No. 11(c). Please identify which of these hydrants (if any) are billed to Lexington.
5. Does KAW's claimed revenue requirement in this proceeding included any costs associated with the Company's proposed Northern Division Connection Project (NDCP)(PSC Case No. 2012-00096) ? If so, please provide a detailed breakdown of all such NDCP-related costs, by revenue requirement component (e.g., operating expenses, depreciation, required return, taxes, etc.).
6. If applicable, please quantify the amount of Northern Division Connection Project (NDCP)-related costs that are included in each line item of KAW's class cost-of-service study contained in Schedule B of Exhibit No. 36.
7. Please reference KAWC Exhibit 37, Schedule M-1. Please provide a revised Schedule M-1 that shows a detailed breakdown of KAW's total claimed operating revenues into: a) Northern Division revenues; and b) Central Division revenues. Include an electronic copy of the revised Schedule M-1 with all formulae intact.
8. Does KAW have the ability to provide Lexington (or any other customer) with a monthly electronic batch file (i.e., a spread sheet containing all accounts, meter read dates, consumption volumes, and cost of service)?
9. Does KAW have an estimated timeline for providing electronic billing using an EDI protocol?
10. How does KAW's unsold line loss compare with other American-Water affiliated companies and with other water utilities of a similar size?
11. Please provide KAW's funding for conservation programs as a percentage of its revenues. How does this percentage compare with other American-Water affiliated companies and with other water utilities of a similar size? Have you ever considered adopting a metrics or other means of measuring the success of your conservation programs? Why or why not?