

**Application of Water Service Corporation of Kentucky  
For A General Adjustment in Existing Rates  
Case No. 2013-00237  
Attorney General's Responses to Data Requests of Water Service Corp.**

WITNESS RESPONSIBLE:  
Andrea C. Crane

QUESTION No. 1  
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With respect to the testimony of Andrea C. Crane, please provide the following:

- a. Provide a copy of each written testimony that Ms. Crane has submitted since January 1, 2011 in all utility commissions, in which the topic of her testimony related in part or in whole to revenue requirements. Each testimony should be submitted in a pdf file with OCR so that it is searchable;
- b. Provide a copy of each written testimony that Ms. Crane has submitted in matters related to water utilities since January 1, 2004, in all utility commissions, in which the topic of her testimony related in part or in whole to revenue requirements. Each testimony should be submitted in a pdf file with OCR so that it is searchable;
- c. Provide a copy of the corresponding final order for the docket (and if there is no final order, indicate the procedural status of the proceeding) from the cases in which Ms. Crane has provided testimony as identified in requests (a) and (b) above; and
- d. Please provide a copy of Ms. Crane's workpapers for her testimony in this matter.

RESPONSE:

- a. Objection, this requests information that the Company has the same access to as the AG. Without waiving this objection, Attached separately as Appendix A is a list of all testimonies filed by Ms. Crane since January 1, 2004. This list includes the name of the utility, the type of utility, the date the testimony was filed, the state in which the testimony was filed, the subject matter of the testimony, and the client on whose behalf the testimony was filed.

As a general rule, Ms. Crane does not retain copies of her testimonies. All of Ms. Crane's testimonies filed in Kansas ([www.kcc.state.ks.us](http://www.kcc.state.ks.us) and go to Docket Filings) and New Mexico ([www.nmprc.state.nm.us](http://www.nmprc.state.nm.us) and go to Quick Links) are

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available from the Commissions' websites in those states. Many of Ms. Crane's other testimonies are also available from various Commission websites. Attached separately are copies of the testimonies on water utility revenue requirements that Ms. Crane has retained, including:

1. Artesian Water Company, PSC Docket No. 11-207, filed September 22, 2011 on behalf of the Division of the Public Advocate (Delaware)
  2. Pawtucket Water Supply Board, Docket No. 4171, filed July 20, 2010 on behalf of the Division of Public Utilities and Carriers (Rhode Island)
  3. Aqua Pennsylvania, Inc., Docket No. R-00051030, filed February 28, 2006 on behalf of the Pennsylvania Office of Consumer Advocate (Pennsylvania)
  4. West Virginia-American Water Company, Case No. 08-0900-W-42T, filed November 6, 2008 on behalf of the Consumer Advocate Division (West Virginia)
- b. Objection, this requests information that the Company has the same access to as the AG. Without waiving this objection, see the response to 1a.
- c. Objection, this requests information that the Company has the same access to as the AG. Without waiving this objection, Ms. Crane does not retain copies of final orders in cases in which she has provided testimony. However, copies of the final orders should be available from the respective commissions.
- d. Ms. Crane's schedules constitute her workpapers. Her schedules were filed alongside her direct testimony. There are no additional workpapers.

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QUESTION No. 2

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Refer to page 10, lines 17-19 of Ms. Crane's testimony.

- a. Identify all Public Service Commission of Kentucky decisions to which Ms. Crane refers in making her conclusions and opinions;
- b. Identify all regulatory policies to which Ms. Crane refers in making her conclusions and opinions, and identify the rate cases in which those policies were adopted; and
- c. To the extent that the rate cases identified in (b) above were not from Kentucky, provide a copy of the final order from each respective case and all other orders from those cases discussing the referenced regulatory policies.

RESPONSE:

- a. As referenced throughout her testimony, Ms. Crane reviewed Public Service Commission of Kentucky orders in the Company's last two base rate cases (Case No. 2008-00563 and 2010-00476). She also references the Public Service Commission of Kentucky order in Case No. 10498 (see footnote 11 on page 29 of her testimony).
- b. The regulatory policies used by Ms. Crane include, but may not be limited to, the policy that ratepayers should not pay for costs that are not necessary for the provision of safe and reliable utility service; the policy that regulatory components such as revenues, expenses, and investment should be matched based on a twelve-month test year or test period; and a policy that prospective utility rates should reflect a normal level of prospective costs. Ms. Crane did not depend upon any specific regulatory commission order in referring to these policies; rather she relied upon her general experience in over 350 utility rate proceedings in the past 25 years.

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Additionally, in preparing her testimony Ms. Crane reviewed the orders provided by the Company in the response to Staff 3-8 and she does refer to some of these orders on page 26 of her testimony. She did not necessarily rely upon the referenced orders to formulate her opinions or develop her conclusions, but the referenced orders do support her conclusions and recommendations. Also, see the response to 2a.

- c. See the response to 2b.