COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY- )
AMERICAN WATER COMPANY ) CASE NO.
FOR AN ADJUSTMENT OF RATES ) 2015-00418

CAC’S FIRST REQUEST FOR INFORMATION TO KAWC

* * * * *

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and submits its First Request for Information to Kentucky American Water Company. Please identify the company witness or witnesses who will be prepared to answer questions concerning each request.

1. What is the total amount of funding Kentucky American Water Company has contributed in each year 2011, 2012, 2013, 2014, and 2015 to all programs that directly assist its low-income customers in paying their water bills?

2. What is the total amount of funding Kentucky American Water Company has contributed in each year 2011, 2012, 2013, 2014 and 2015 to the Help to Others (H2O) program to assist its low-income customers in paying their water bills?

3. How much have Kentucky American Water Company ratepayers, through voluntary donations, contributed to the Help to Others (H2O) program in each year 2011, 2012, 2013, 2014, and 2015?

4. Please provide a list of Kentucky counties in which Kentucky American Water Company provides service and the number of residential customers in each of those counties.

5. What is the current average total monthly water usage for residential customers of Kentucky American Water Company?
6. Has Kentucky American Water Company calculated the likely impact of the requested residential rate increase on shutoffs and arrearages? If yes, what are the results of that calculation?

7. Given that the proposed increase in rates will make water less affordable for many residential customers, explain Kentucky American Water Company’s plan to prevent increases in its shutoff rates and the amount of arrearages owed by its residential customers?

8. Other than its contribution to H2O, what steps has Kentucky American Water Company taken since its last rate case to make water more affordable for its low-income customers?

9. Please identify all American Water companies that offer low-income rates or other options for making water more affordable for their low income customers and what option is offered by each company.

Respectfully submitted,

IRIS G. SKIDMORE
Bates and Skidmore
415 W. Main St., Suite 2
Frankfort, KY 40601
Telephone: (502)-352-2930
Facsimile: (502)-352-2931
BatesAndSkidmore@gmail.com

COUNSEL FOR CAC
CERTIFICATE OF SERVICE

I hereby certify that CAC’s March 3, 2016 electronic filing is a true and accurate copy of CAC’s First Request for Information to KAWC and cover letter to be filed in paper medium; that the electronic filing has been transmitted to the Commission on March 3, 2016; that an original and one copy of the filing will be delivered to the Commission on March 3, 2016; that there are currently no parties excused from participation by electronic service; and that, on March 3, 2016, electronic mail notification of the electronic filing is provided to the Commission and the following:

Lindsey W. Ingram, III, Esq.
STOLL KEENON OGDEN PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
L.Ingram@skofirm.com

Monica Braun, Esq.
STOLL KEENON OGDEN PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801

Linda C. Bridwell
Director of Engineering
Kentucky American Water Company
2300 Richmond Road
Lexington, KY 40502

Kentucky American Water Company
2300 Richmond Road
Lexington, KY 40502

Angela M. Goad, Esq.
Assistant Attorney General
Office of the Attorney General Utility and Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204
Angela.Goad@ag.ky.gov

Gregory T. Dutton, Esq.
Assistant Attorney General
Office of the Attorney General Utility and Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204
Gregory.Dutton@ky.gov
Rebecca W. Goodman, Esq.
Assistant Attorney General
Office of the Attorney General Utility and Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY  40601-8204

David J. Barberie, Esq.
Managing Attorney
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, KY  40507
d.barberi@lfucg.com

Andrea C. Brown, Esq.
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, KY  40507

Janet M. Graham, Esq.
Commissioner of Law
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, KY  40507

____________________
Counsel for CAC