

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

|   |   |                            |
|---|---|----------------------------|
| <b>IN THE MATTER OF:</b>                    | ) |                            |
|   | ) |                            |
| <b>THE APPLICATION OF KENTUCKY-AMERICAN</b> | ) | <b>CASE NO. 2015-00418</b> |
| <b>WATER COMPANY FOR AN ADJUSTMENT OF</b>   | ) |                            |
| <b>RATES</b>                                | ) |                            |

**KENTUCKY-AMERICAN WATER COMPANY’S  
DATA REQUESTS TO COMMUNITY ACTION COUNCIL**

In accordance with the Public Service Commission’s (“Commission”) February 22, 2016 Order, Kentucky-American Water Company (“KAW”) propounds the following data requests upon Community Action Council (“CAC”). CAC shall respond to these requests in accordance with the provisions of the Commission’s February 22, 2016 Order and the instructions set forth below.

**INSTRUCTIONS**

1. In producing documents and things responsive to these requests, CAC (“you”) shall respond in accordance with the requirements set forth in the Commission’s February 22, 2016 Order and the production shall be organized and labeled to correspond with the data requests to which they are responsive, regardless of whether these documents and things are possessed directly by you or by your present or past agents, employees, companies, licensees, representatives, investigators, or attorneys.

2. If the attorney-client privilege or work product immunity is asserted as to any document or thing, or if any document or thing is not produced in full, produce the document or thing to the extent the request for production is not objected to, and, in so doing, state the following:

- (a) the specific ground(s) for not producing the document or thing in full;
- (b) the basis for such a claim of privilege or immunity and the facts supporting that basis; and
- (c) fully identify the information or material contained within the document or thing for which such privilege or immunity is asserted, including as applicable, the name of any document or thing; its date; the name, address and job title of each author or other person involved in its preparation, each addressee and each person to whom a copy of the document or thing has been sent or received; and the general nature of the document or thing (e.g., memoranda, letter).

3. Where an objection is made to a request, state all grounds upon which your objection is based.

4. If, after exercising due diligence, you are unable to determine the existence of any documents or things falling within a specific request, you shall so state in your written response.

5. With respect to each of the following requests, you shall identify and/or produce all documents which are known to you or which can be located or discovered by you through diligent effort on your part, including, but not limited to, all documents which are in your business, personnel, and/or personal files or those of your present or past employees or contained or stored within a computer in your possession or those of your present or past representatives, attorneys, or accountants, or accessible to you or your present and past employees, or its representatives, attorneys, or accountants.

6. Whenever used herein, the singular shall be deemed to include the plural and the plural shall be deemed to include the singular and the disjunctive shall be deemed to include the

conjunctive and the conjunctive shall be deemed to include the disjunctive so as to elicit all information potentially responsive to the request for production.

**REQUESTS**

1. Reference Mr. Ratchford's testimony, page 10. Please produce any studies or evidence developed by or known to CAC that demonstrates that a graduated or tiered rate structure benefits low-income customers.
2. Reference Mr. Ratchford's testimony, generally. Please produce any empirical and/or statistical evidence developed by or known to CAC regarding the household size of low-income customers as compared to household size of all customers.

Dated: May 23, 2016

Respectfully submitted,

Lindsey W. Ingram III  
Monica H. Braun  
STOLL KEENON OGDEN PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801  
Telephone: (859) 231-3000



BY: \_\_\_\_\_

Attorneys for Kentucky-American Water Company

**CERTIFICATE**

This certifies that Kentucky-American Water Company's electronic filing 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 23, 2016; that a paper copy of the filing will be delivered to the Commission within two business days of the electronic filing; and that no party has been excused from participation by electronic means.

STOLL KEENON OGDEN PLLC

By *Maura H. Braun*

Attorneys for Kentucky-American Water Company