

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
KENTUCKY-AMERICAN WATER)	CASE NO. 2018-00358
COMPANY FOR AN ADJUSTMENT)	
OF RATES)	

ATTORNEY GENERAL'S POST-HEARING DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Post-Hearing Data Requests to Kentucky-American Water Company (hereinafter “KAWC” or the “Company”) to be answered by May 24, 2019, and 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 requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) 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.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) 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.

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

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting

records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) 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.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please 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.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR
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1. Refer to Ms. Bulkley's Direct Testimony, page 25. Provide an updated Figure 5 for the same timeframe with any and all actual recent data available.
2. Refer to the Company's response to the Attorney General's Initial Data Requests, item 96, page 4 of 4. For each vendor identified in the response as participating in "Legislative Advocacy," "Regulatory Advocacy," and/or "Public Relations," as those terms are understood in the context of the request and response, provide the total and individual amounts of test-year dues excluded from the forecast period for ratemaking purposes. Each such identification should provide the test-year level of dues forecasted, the amount excluded, and the basis for such exclusion. Further, explain and support the basis for the percentages supplied in the cited response.
3. Refer to the base period update, updated Application Exhibit 37, Schedule G-2, page 3 of 10. Provide the Company's actual full-time employee level as of May 15, 2019. The method of determination of the actual employee level sought in this request should be the same as that used by the Company in calculating the actual base period year-end employee level (143) and the forecasted period year-end employee level (152) provided for in the referenced schedule.
4. Refer to the rebuttal testimony of Brent O'Neill, pages 16–18, wherein he discusses the Company's current unaccounted-for water, and 807 KAR 5:066, Section 6(3). Refer further to the Company's response to the Attorney General's Supplemental Data Requests, item 39, wherein it provides the Company's forecasted test-period level of unaccounted-for water (19.37%). If the Commission does not grant the Company's request for an alternative level of unaccounted-for water loss and instead, consistent with the regulation, denies recovery of the cost to produce and purchase water in excess of the 15% threshold, provide the revenue requirement impact resulting from the denial. Any response shall include a narrative explanation of the calculation and determination of purchased and produced water costs, the calculation of unaccounted-for water, and any substantive judgment used in calculating the same. Further, provide all workpapers in native format and all supporting documents used in formulating a response to this request.