

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

In accordance with the Public Service Commission's ("Commission") December 5, 2018 Order, Lexington-Fayette Urban County Government ("LFUCG") propounds the following data requests upon the Applicant Kentucky-American Water Company ("KAWC"). KAWC shall respond to these requests in accordance with the provisions of the Commission's Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate LFUCG's request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for LFUCG.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, 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 which would not be self-evident to a person not familiar with the printout.

7. If KAWC objects to any request on any grounds, please notify counsel for LFUCG as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; 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 following: 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.

10. 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.

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that on January 10, 2019, electronic filing of this document is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be transmitted to the Commission on January 10, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of this document will be delivered to the Commission within two business days.



Counsel for LFUCG

Requests for Information

1. Please provide the total number of water service meters assigned to Lexington as a customer in the base period and in the forecasted test period, and the total revenue requirement assigned to Lexington as a customer in the base period and the forecasted test period.

2. Under how many different types of customer rate classes does Lexington currently make payments to KAWC? For each type of class, please provide the following information:

- (a) The type of customer rate class;
- (b) The number of accounts in each such class;
- (c) Whether such accounts are metered;
- (d) The account numbers for each separate account;
- (e) The physical location, by street address, GPS marker (or other easily understood designation) of each separate account;
- (f) The basis and explanation for treating the account as a separate account, whether it is because it is separately metered or otherwise;
- (g) The total amount paid by Lexington to KAWC for the provision of water for each of its separate accounts for each year, going back the inception of KAWC's last approved rate increase; and
- (h) The total net projected impact for each such class under the proposed rate increase.

3. Does KAWC believe that the filing and/or proposed rate increases will in any way change the types of services for which it pays franchise fees to Lexington? If so, please explain.

4. Does the franchise fee assessed by Lexington currently apply to public fire hydrants?

5. Will the franchise assessed by Lexington fee apply to the proposed Qualified Infrastructure Program (QIP)?

6. Please list all of the tariffs applicable to the use or consumption of water in Fayette County for which KAWC does not currently pay Lexington a franchise fee.

7. Is KAWC amenable to modifying the existing franchise fee tariff for public fire hydrants?

8. Does KAWC or any other American Water Company subsidiary have a tariff, contract or other arrangement under which the costs related to public fire hydrants are passed through to one or more of the other customer classes? If so, please list the name of the jurisdiction and provide the details of the arrangement, including any relevant supporting

documents.

9. Do any American Water Company subsidiaries currently have a contract under which they provide sewer billing services on behalf of a local government? If so, please provide the name of the subsidiary and local government and provide a copy of each contract.

10. Please describe in detail any ongoing efforts of KAWC to expand its sale or provision of water.

11. Please describe in detail any ongoing efforts of KAWC to expand its involvement with the Partnership for Safe Water or any other treatment programs established by the Environmental Protection Agency.

12. Please describe in detail any and all lead testing services offered by KAWC to residential customers in Fayette County.

13. Please provide all information relating to prospective sales of water to communities or facilities outside Fayette County, and more specifically, whether such efforts are being increased due to additional water availability. If not, please explain. Please also explain any marketing or other efforts in detail and provide copies of any business or marketing plans.

14. How many KAWC employees are located in Lexington, Kentucky? Please provide a description of the number and types of position for each. If KAWC anticipates any change within the next five (5) years, please provide the specific details.

15. How many public fire hydrants are currently in use? How many of these hydrants are billed to Lexington?

16. How many public fire hydrants are projected to be in use during the forecasted test period? How many of these hydrants are projected to be billed to Lexington?

(a) Please provide a list of all of the ratepayers (other than Lexington) who pay for any public fire hydrants.

(b) What percentage of gross revenue does KAWC derive from public and private fire protection charges/rates, or similar charges/rates?

17. Is the Public Fire Service Revenue component of the cost of service study comprised of anything other than the total number of public fire hydrants and the tariff (KAWC Exhibit 36, Schedule A; KAWC Exhibit 37, Schedule M-3)?

(a) What is the total number of public fire hydrants in the base period?

(b) What is the total number of public fire hydrants in the forecasted test year?

(c) It appears that the number of public fire hydrants in the test year is less than the number of public fire hydrants in the base period (Exhibit 37, Schedule M-3). What is the basis for this? If this is an error, please provide a revised cost of service study and/or schedules.

18. Please provide a breakdown of the total number of the following fire hydrants in Fayette County: (a) public fire hydrants, (b) fire hydrants that are owned and maintained by KAWC, but located on private property, and (c) hydrants for which KAWC is not the owner. If possible, please provide the location of each hydrant. If this information is not available, please explain what action, if any, KAWC is taking to track this information going forward in time.

19. Please describe the process that is undertaken before a privately owned fire hydrant is added to KAWC's system. Please provide a copy of any contracts or other documents that are required to be followed or executed by the owner of the hydrant.

20. Please provide the following information with respect to public fire hydrant charges:

- (a) The total number of hydrants charged to Lexington during the base period;
- (b) The total number of hydrants charged to Lexington during the forecasted test period;
- (c) The basis for the projection of the number of hydrants charged to Lexington during the forecasted test period;
- (d) Any adjustment to hydrant charges to reflect system uses of hydrants, including but not limited to flushing the KAWC system; and
- (e) Please provide the number (quantity), type, and location (by street address or other easy to identify locator) of each fire hydrant for which Lexington currently pays a monthly tariff.

21. Please detail the administrative cost component attributable to public fire protection, and provide any applicable work papers showing how the cost component is calculated.

22. What is the cost to KAWC (per unit) to acquire each type of fire hydrant?

- (a) Would the creation of a tariff under which a public utility owned its fire hydrants result in a reduction in the existing public fire hydrant tariff?
- (b) Why or why not?

23. How many additional new fire hydrants does KAWC anticipate being installed in Fayette County over the next 5 years for which Lexington would be billed? Please net out any hydrants that would be removed from the system as part of this calculation.

24. Will KAWC's proposed capital expenditures under the QIP extend to every customer class? Please identify each class and describe the anticipated replacements and/or upgrades.

25. Does KAWC have any plans to make significant capital investments to public fire protection facilities under the (QIP)? Please describe any and all efforts by KAWC to improve public fire protection service.

26. Will the QIP tariff apply to all customer classes?

27. Please explain in detail KAWC's current policies, procedures, practices, and/or guidelines for testing, maintaining and/or replacing fire hydrants in Fayette County and provide copies of the same.

28. Please describe in detail all inspections, maintenance, or testing that must be performed by KAWC on each type of fire hydrant to ensure that it operates properly, and provide a list breaking down each of the components of the above and its cost, as well as how frequently each of the above must be performed, or actually is performed. Also describe in detail all maintenance that must be performed by KAWC on the public fire system to ensure that it operates properly. Please explain how KAWC maintains any such records.

29. Please provide the standard(s) that KAWC is using to determine that a fire hydrant is leaking, failed or obsolete. If a hydrant is identified in such a condition, is it still billed to the customer, or is immediately removed from future billing until corrected?

30. Is there a minimum flow rate at which KAWC deems a fire hydrant not to be useful? What if anything, is done with respect to such hydrants, when they are identified? If there is a difference in how different types of hydrants are treated, please explain.

31. Does KAWC require its privately-owned fire hydrant or service customers to provide any evidence or documentation that such systems are being adequately maintained, inspected, or tested on regular basis, or does KAWC ever perform any testing? Please explain.

(a) What, if anything, does KAWC do if it comes to its attention that a privately owned fire hydrant is no longer operable?

32. Would KAWC object to the PSC implementing additional minimum requirements with respect to maintenance, performance, or operational standards for all fire hydrants in Fayette County? Please provide a detailed response.

(a) Does your answer differ depending upon the type of hydrant involved (public, private, and privately owned)? If so, please explain why.

33. Are all privately-owned water lines metered at some point? If not, please explain how a determination is made with respect to whether such a line is metered.

34. Please refer to KAWC Tariff "Classification of Service – Service Classification No. 4."

(a) How many customers have meters installed by KAWC because of suspicion of usage other than fire extinguishment? Does LFUCG have any of its accounts for First Service

with such a meter? If so, please identify the account location and number.

(b) How many “special connections” with service contracts does KAWC have? Does LFUCG have any of its accounts serviced through such a contract? If so, please attach a copy of each such contract.

35. What depreciable life basis (if any) for each type of fire hydrant does KAWC utilize? Is this the industry standard service? If not, please explain.

36. What is the individual fire flow requirement to which KAWC's water system in Fayette County has been designed and/or built?

(a) Does this differ in any way from the historical or current actual performance level of the system?

(b) How often is this tested?

(c) Are these results provided to the LFUCG Division of Fire and Emergency Services?

37. What is the minimum fire flow protection required to meet ISO guidelines? Please provide any supporting documentation.

38. Please provide the annual use of water for fire service for calendar years 2012-2015, inclusive, and for each month as it is or becomes available during the base period. If water use for fire service has been projected for the forecasted test period, please provide that projection as well.

39. What is the basis for the 10,000 gpm of fire flow (KAWC Exhibit 36, Schedule C)?

40. What is the basis for the utilizing a 10-hour demand for fire flow on KAWC Exhibit 36, Schedule C?

41. Does KAWC have any plans to acquire any additional water or wastewater facilities during the forecast period? If so, please provide a detailed explanation.

42. Please provide a list of all local governments and water utilities in Kentucky (other than Lexington) who obtain water from KAWC and the terms of each such arrangement. As KAWC adds additional customers of this type, please explain whether such customers will reduce the burden of the Kentucky River Station II Water Treatment Plant and associated pipeline on existing customers, or whether they will in any way reduce the cost of future water rates.

43. Has the actual current use of water met KAWC's projections from the last several years? Please explain.

(a) To what extent are current consumption and demand rates consistent with

the projections KAWC has submitted in PSC proceedings since 2002?

44. Please provide the total amount of water supplied by KAWC to its customers on an annual basis since 2010. To the extent possible, please provide the same information broken down into counties or regions.

(a) Please provide this information for each category of ratepayer.

45. Does KAWC have an estimate of how much water has been lost due to leaking KAWC infrastructure? Please provide this information for the previous 5 years by volume and percentage of treated water.

46. Please describe what processes are in place to identify a potentially stuck meter or unknown leak (e.g., automated review of meter data).

47. Does KAWC have a formal policy or informal practice regarding expenses incurred by a customer due to an unknown leak? Does KAWC grant customers leniency in this situation? If so, please describe.

48. Identify the percentage of KAWC's non-revenue water for each of the last 60 months. Include within your response the formula of how KAWC calculates this percentage.

49. Please describe existing or planned water conservation programs aimed at end customers and the respective annual funding for such programs. For each such program, please provide an annual estimate of the quantity, in volume and percentage of treated water, of water which will not be consumed as result of the program.

50. Please refer to the testimony of Nick O. Rowe in response to the Question appearing on line 20, page 8.

(a) Please provide a listing of all of the capital investments the Company has made since the last rate case totaling "more than \$100 million."

(b) For each such investment, please list the amount of the investment in each project by year "since the last rate case"; provide the description of the project; provide the location of the project; and provide the expenditure for each project by year.

51. Please refer to the testimony of Nick O. Rowe beginning on line 2, page 8. Please list each item of infrastructure that is in need of replacement. For each such item of infrastructure, please provide:

- (a) description of the infrastructure to be replaced;
- (b) the location of said infrastructure;
- (c) its total useful life in years;
- (d) the number of years it has been in service;
- (e) the date on which replacement is expected to begin; and
- (f) the estimated cost of replacement.

52. Please refer to the testimony of Nick O. Rowe beginning on line 4, page 10. Please provide the source(s) for the following two statements contained therein:

(a) “Compared with other utilities, water utilities are the most capital intensive utilities in the industry.”

(b) “The water industry is significantly more capital intensive than both the gas and electric industries.”

53. Please refer to the sentence in the testimony of Nick O. Rowe beginning on line 6, page 10.

(a) What is meant by the statement that improved leak detection, infrastructure replacement and repair, and environmental compliance are non-revenue producing investments?

(b) Does this mean that these listed investments are not included in rate base for purposes of receiving a return?

(c) If the answer to (b) above is “no,” please explain your answer.

54. This question is directed to Nick O. Rowe. Will your compensation or the compensation of any other KAWC employee be affected by whether or not the QIP is approved by the PSC? If so, please state the name of each employee and how the compensation will be so impacted.

55. Please refer to page 13, line 13 of the testimony of Nick O. Rowe. What is the ongoing trajectory of planned capital expenditures?

56. Please refer to page 13, line 11 of the testimony of Nick O. Rowe. Please quantify what a “more optimal level of infrastructure investment means.”

57. Please refer to page 13, lines 16-17 of the testimony of Nick O. Rowe. With specificity, please state whether in the past, KAWC has “lump[ed] a cumulative series of investments for episodic rate case filings.”

(a) If the answer above is “yes,” please detail why that is accurate by referencing the case number, and the amount of capital requested from 2008 through the present in each such case.

(b) If the answer is “no,” please describe with detail as to how often rate cases are planned for the future with the amount of capital investment likely requested.

58. Has KAWC had difficulty attracting capital either internally from American Water or from outside capital? If yes, please provide evidence of this.

59. If the QIP is approved what would be the expected reduction in rate cases filing from the present to 2030?

60. Please refer to page 16, line 13 of Nick O. Rowe’s testimony. Please provide

any evidence, data supported or not, as to why KAWC has been “at a significant disadvantage to attract discretionary capital allocations from American Water as compared to its affiliates” from 2008 to the present. The response should include for each year the total amount of discretionary capital made available to each of American Water’s affiliates, including Kentucky American Water.

61. Please see the testimony of Melissa Schwarzell on page 31, line 7.

(a) What is the difference between revenue and non-revenue producing plan investment?

(b) Will the Company receive a return on all of these investments?

62. Please reference the testimony of Brent O’Neill in Case No. 2015-00418.

(a) Please provide a copy of the Company’s “capital investment plan” referenced therein.

(b) What date was it prepared?

(c) For what years 2008-2019 was the “capital investment plan” prepared? Please attach a copy of the plan for each of the years it was prepared.

63. Please reference the Accelerated Pipe Replacement Program referenced in Exhibit 1 to the testimony of Brent O’Neill in Case No. 2015-00418.

(a) Please provide a copy of the Company’s Accelerated Pipe Replacement Program referenced therein.

(b) Was the Program implemented?

(c) If so, please provide the results and any analysis of the Program.

(d) If not, why was it not implemented?

(e) Why was it not included as a part of the settlement?

64. Was Exhibit 11 to the Application filed herein prepared explicitly for its purpose of the rate Case 2018-20358? If not, please attach a copy of the document titled “Proposed Construction Expenditures” for each year from 2008-2019.

65. Was Exhibit 1 to Brent O’Neill’s testimony in Case No. 2018-00358 prepared explicitly for the purpose of this rate case? If not, please attach a copy of the document Strategic Capital Expenditure Plan for each year from 2008-2019.

66. Please provide any description or detail of the Strategic Capital Expenditure Plan that is not already included in O’Neill Exhibit 1 attached to his testimony in 2018-00358.

67. Please reference Exhibit 13 to the company’s application in Case 2015-00418. Please provide a copy of that exhibit for each year that it was prepared from 2008-2019.

68. Please refer to: (1) the “proposed Accelerated Replacement Plan” (PARP) presented to the Commission in Exhibit 1 to the testimony of Brent E. McNeil in Case No.

2015-00418; the PARP attached to the testimony of Brent E. McNeil in Case No 2017-00313; and (2) Exhibit 2 to the testimony of Brent E. McNeil in Case No. 2018-00358.

(a) Why did the Company file an identical report of the PARP in 2018 without updating any part of the plan submitted in 2017? Why did the Company not re-do the map in its GIS which was originally run in 2015.

(b) Why did the cast iron and galvanized steel percentage of pipes increase between the 2015 and 2017 reports from 13% to 16.1%

(c) Please indicate how the changes in Table 7 from 2015 to 2017 were calculated and determined.

69. Please refer to Exhibit 1 to the testimony of Brent E. O'Neill, and also Exhibit 11 to the Application filed herein:

(a) With respect to Items H and I, please separately provide the number of meters to be replaced in Item H and in Item I; the cost of the individual meters; a description of the technology involved; the age of the meters replaced; whether or not a CPCN has been filed; and if not, why not.

(b) With respect to Item O, please provide the number of vehicles to be purchased; the year, make and model of each; and the cost of each.

(c) With respect to Item Q, please describe the total cost, a description of the process plant, the nature of the costs and whether the Company sought a CPCN and if not, why not.

(d) Please describe what "ITS – Equipment – Centrally Sponsored" consists of. Please detail the nature of the costs and whether the Company sought a CPCN and if not, why not.

(e) With respect to project #112-020037, please state whether the project was bid.

(f) If so, please attach specifications.

(g) If not, why not?

(h) Please state whether a CPCN was sought.

(i) Why was this project required?

(j) With respect to project #112-020067, please state whether the project was bid.

(k) If so, please attach specifications.

(l) If not, why not?

(m) Please state whether a CPCN was sought.

(n) Why was this project required?

(o) Please state whether any projects resulted from EPA regulations. If yes, please state the project(s) and with specificity the regulations that required the project(s).

(p) On Exhibit 1 to Brent O'Neill's testimony in A-5, the estimated in-service date for all in that list is 12/31/16.

i. Why are the in-service dates identical?

ii. These are not actual in-service dates, please state the actual dates.

70. Please refer to the testimony of Paul R. Herbert in Case No. 2015-00418 dated January 29, 2016 and the testimony of Constance F. Happenstall in the case at hand, No. 2018-00358 dated November 28, 2018.

(a) Explain in detail how and why the sum of the monthly costs for a 5/8-inch meter increased from \$14.85 to \$19.67, a nearly 33% increase.'

(b) Did you use any different methodology in preparing your cost-of-service study than was used in preparing the cost-of-service study prepared by Paul R. Herbert, referenced above?

71. Please refer to the testimony of Constance E. Happenstall in this matter. Please refer to line 4, page 3. What is the meaning of "income available for return?"

72. Please refer to the cost-of-service study located in Exhibit 36 to the application.

(a) Please provide the definition of "Public Authority."

(b) Has the definition changed between 2015 and the present?

(c) Please list all entities which take service under the category "Public Authority."

73. Why does LFUCG take service from the Class designation "private fire" in addition to "public fire?"

74. What is the difference between the private fire and public fire classes?

75. Please provide the authority to support KAWC's position that all fire hydrants are only billed a demand charge?

76. Who made the decision to increase the demand charges on public fire hydrants a greater percentage than private fire hydrants and when was that decision made?

77. Please state why on Schedule C, Page 20 of 22 of the Cost-of-Service Study, account 335.0, Fire Hydrants, there is no allocation of rate base to Private Fire Protection but \$16,374,383 to Public Fire Protection?

78. Please refer to Schedule E, Page 1 of 1, on Page 42 of 47 of the Cost-of-Service Study. Why are the diameters of the water lines squared?

79. Please state why the increase in rates for Public Authorities exceeded the system's average proposed increase by 24.9% to 22.4% for the system average? In answering this DR, please refer to the specific pages and exhibits of the Cost of Service study.

80. Refer to the testimony of Patrick Baryenbruch at page 3, line 18. Did Mr. Baryenbruch compare KAWC's cost-per-customer for its Service Company in relation to any other water utilities? If not, why not?

81. Refer to the testimony of Patrick Baryenbruch at page 6, line 8 at which Mr. Baryenbruch refers to neighboring utilities. Please identify what neighboring utilities this references.

82. Refer to the testimony of Patrick Baryenbruch and the related study. Explain how Mr. Baryenbruch can verify that the services provided by comparison utilities' Services Companies are similar to the services provided by American Water's Service Company?

83. Refer to the testimony of Patrick Baryenbruch and page 2 of his study. Why would it be difficult for KAWC to find local service providers with the same specialized experience?

84. Refer to the testimony of Melissa Schwarzell at page 28-29.

- (a) Provide a copy of the asset purchase agreement between KAWC and North Middletown.
- (b) Identify the purchase price of the North Middletown system.
- (c) Identify the net book value of the North Middletown system and the date of valuation.
- (d) Explain how the net book value of the North Middletown system identified above was determined.
- (e) What inadequate facilities that must be restored to required standards has KAWC identified for the North Middletown system, what will be the cost to restore each facility, and when does KAWC plan to perform that restoration work?

85. Provide a list of all assets that Kentucky American will acquire from North Middletown.

86. Provide any current notice of violations issued by the Energy and Environment Cabinet or the Kentucky Division of Water to North Middletown. Provide copies of each outstanding violation and state how the violations will be resolved.

87. Provide non-revenue water calculations for the North Middletown system for each of the last 12 months. Please clearly identify each component of the non-revenue water calculation.

88. Provide a copy of the rate schedule North Middletown currently utilizes for its customers.

89. Explain whether the water purchase contract whereby North Middletown sells water to Judy Water Association will be assigned to KAWC after KAWC acquires North Middletown.

- (a) If not, explain how Judy Water Association will obtain a source of supply for its customers.
- (b) Identify the current wholesale water rates North Middletown sells to Judy Water Association.
- (c) Identify the rate at which KAWC proposes to sell water to Judy Water Association.
- (d) Identify the daily amount of water purchased by Judy Water Association for each day of the most recent 365 days on which KAWC has reported information.

90. Identify and provide copies of any special contracts North Middletown has for the provision of water service to other customers that is not covered by its general rate schedule or by the water purchase contract with Judy Water Association.

91. Refer to the acquisition of Eastern Rockcastle Water Association.

- (a) Provide a copy of the asset purchase agreement between KAWC and Eastern Rockcastle.
- (b) Identify the purchase price of the Eastern Rockcastle system.
- (c) Identify the net book value of the Eastern Rockcastle system as of the date of closing.
- (d) Explain how the net book value of the Eastern Rockcastle system identified above was determined.
- (e) Identify all capital improvements KAWC has made to Eastern Rockcastle's system since its acquisition and the cost of those capital improvements.

92. Provide non-revenue water calculations for the Eastern Rockcastle system for each 12 months since March 2017, which includes a 12-month period prior to KAWC's ownership. Please clearly identify each component of the non-revenue water calculation.

93. Please refer to paragraphs 11 and 12 of the Application.

(a) What is the amount of the increase to the revenue requirement to KAWC customers living outside of the Southern Division resulting from the unification of rates with the former Eastern Rockcastle Water Association?

(b) Please explain how that increase was determined by providing workpapers.

(c) Please provide the total amount of the increase to each customer class, the increase in rates to each customer class, and the effect on the average bill for each customer class.

94. Explain whether KAWC provides any relief to a customer who proves that a water leak occurs on a line downstream of the meter but on a section of a line outside of the customer's control. For example, would KAWC provide relief to an apartment-complex tenant who is a customer if the leak is proven to be on a section of water line downstream of the meter but in the common area of the apartment complex.