

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

**APPLICATION OF KENTUCKY-
AMERICAN WATER COMPANY TO
AMEND TARIFF TO REVISE QUALIFIED
INFRASTRUCTURE PROGRAM CHARGE**

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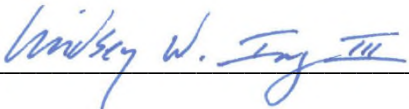
CASE NO. 2021-00090

NOTICE OF ADOPTION OF TESTIMONY AND DATA RESPONSES

Kentucky-American Water Company (“KAW”) hereby notifies the Commission that KAW witnesses Kurt A. Stafford and Elaine K. Chambers are no longer employed at KAW. Mr. Brent O’Neill and Ms. Krista Citron jointly adopt Mr. Stafford’s direct testimony and data response in this matter. Mr. Todd Wright adopts Ms. Chambers’ direct testimony and data responses in this matter. Resumes for all three adopting witnesses are attached.

Respectfully submitted,

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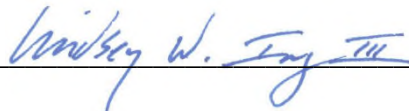
BY: 

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 28, 2021; that a paper copy of the filing will be delivered to the Commission in accordance with the Commission's March 16, 2020 Order in Case No. 2020-00085; and that no party has been excused from participation by electronic means.

STOLL KEENON OGDEN PLLC

By 

Attorneys for Kentucky-American Water Company

Brent E. O'Neill, P.E., M.B.A.

Qualifications

Professional Engineer with 30 years of experience in demonstrated roles of leadership and authority. Qualified to lead and manage staff to implement multidisciplinary projects. Demonstrated success leading the implementation of improvements of major capital projects involving water production and distribution facilities. Performed analytical review and strategic planning of improvements to facility and distribution system assets. Developed and established process reviews and participated in system acquisitions.

Professional Experience

Director of Engineering

American Water Company, Belleville, IL

September 2019 – Present

Supervised projects and staff for the Illinois Engineering Departments. Development of strategic planning and project coordination for Illinois American Water Companies. Development and oversight of Capital Spending Plans for Illinois. Oversaw the design, coordination, and management of the construction and commission of water main extensions, water storage facilities, pumping facilities and production facilities. Led staff through delivery of a combined \$343 million Capital Investment Budget during 2019 and 2020.

Director of Engineering

American Water Company, Lexington, KY

May 2013 – September 2019

Supervised projects and staff for the Kentucky and Tennessee Engineering Departments. Development of strategic planning and project coordination for both Kentucky and Tennessee American Water Companies. Development and oversight of Capital Spending Plans for both Kentucky and Tennessee. Oversaw the design, coordination, and management of the construction and commission of water main extensions, water storage facilities, pumping facilities and production facilities. Led staff through delivery of a combined \$250 million Capital Investment Budget which included the completion of Kentucky American Water 25 MGD Filter Building and Tennessee American Dewatering Facility with a combined investment of \$33 million. Established delivery of Tennessee Capital Riders that has resulted in a \$62.6 million investment over the period of 2014 to 2017.

Engineering Manager Capital Delivery

Illinois-American Water Company, Belleville, Illinois

March 2008 – May 2013

Supervised projects and staff for the Illinois Engineering Department with responsibility for capital projects in several districts within Southern and Central Illinois, as well as Iowa. Participated in the development of strategic planning and project coordination for several divisions of ILAWC. Designed, coordinated, and managed the construction and commission of water main extensions, water storage facilities, pumping facilities and production facilities. Led staff through development, design and construction of 14 major facility improvements and numerous additional projects valued at \$157.6 million over the past 4 years.

Project Manager

Illinois-American Water Company, Champaign, Illinois

March 2006 – February 2008

Supervised distribution functions and forty staff for the Champaign County Region, serving more than 141,000 residents through 585 miles of mains and 49,632 meters. Developed strategic plans and served as project manager for \$52 million lime softening ground water treatment facility that meet planned in-service date of December 2008 and was complete within 1% of budget. Ensured projects met regulatory requirements for numerous agencies.

Senior Asset Manager

American Water Company/Thames, Reading, United Kingdom

June 2005 – March 2006

Provided technical assistance and reviewed the development of GIS Foundation Project for Thames Water. Managed the development of the View Tool in order to move to a single platform from 26 individual systems.

Network Operations Manager

Illinois-American Water Company, Champaign, Illinois

August 2004 – June 2005

Supervised distribution functions and forty staff for the Champaign County District. Developed strategic and business plan for the district. Ensured coordination and communication for five communities and seven large wholesale customers served by the district.

Engineering Manager**Illinois-American Water Company, Champaign, Illinois****September 1999 – August 2004**

Supervised projects and staff for the Champaign Engineering Department with responsibility for capital projects in several districts within Central Illinois. Participated in the development of strategic planning and project coordination for several divisions of ILAWC. Designed, coordinated, managed and observed the construction and commission of water main extensions, water storage facilities, pumping facilities and production facilities. Oversaw development of developer installed distribution extensions, specifications and procedures.

Education and Licenses**Masters in Business Administration**

Lumpkin College of Business, Eastern Illinois University, May 2002

Bachelor of Science in Civil Engineering

College of Engineering, University of Illinois at Urbana-Champaign, May 1991

Illinois Professional Engineer, License Number 0062-052154

Iowa Professional Engineer, License Number 016756

Kentucky Professional Engineer, License Number 29752

Tennessee Professional Engineer, License Number 117050

Additional Employment**Staff Engineer**

Northern Illinois Water Corporation, Champaign, Illinois

August 1996 – September 1999

Civil Engineer I

Town of Normal, Normal, Illinois

December 1994 – August 1996

Civil Engineer

Berns, Clancy and Associates, P.C., Urbana, Illinois

June 1991 – December 1994

Selected Technical Skills

- Hydraulic Model Development utilizing Haestad WaterCAD
- AutoCAD
- ArcGIS/ArcView
- Microsoft Office, Word, PowerPoint, Project, Excel, Access and Visio

Professional Associations

- Chairman, East Central Regional Water Supply Planning Committee, 2007
- Mahomet Aquifer Consortium, 2004 – 2007
- Illinois Society of Professional Engineers, 1991-2007; Chapter Representative, 1998-2000
- American Water Works Association, 1996-2007
- Guest Lecturer, University of Illinois at Urbana-Champaign, Civil Engineering Department
- Champaign Rotary, 2006 - 2007

Community Involvement**Explorium of Lexington, 2014-2019**

Chairman and Board member for a non-profit Lexington Children's Museum. Our mission is to create a fun and dynamic hands-on learning environment that inspires imagination and curiosity.

Champaign-Urbana Theatre Company, 1992-2007

Founding board member, past board president and production chair responsible for \$150,000 annual production season for a non-profit community theater organization.

HIGHLIGHTED EXPERTISE**Leadership and Critical Thinking**

- Co-Chair of American Water's Women Employee Business Resource Group (W-EBRG).
- Project manager for \$4.5 million pump replacement at KRS-1 Water Treatment Plant.
- Graduate of 2018-2019 class of Kentucky's Leadership PE program.
- Stormwater Program Leader for eleven central Kentucky communities ranging in size from 5,000 to 32,000+ people.
- Lead designer on \$1.25 million wastewater pumping station for Lexington-Fayette Urban County Government.
- Vice President of Kentucky Stormwater Association (200+ members) and Program Director for Bluegrass Regional Alliance for Stormwater Success (50+ members).

Communication and Collaboration

- Established and chaired Kentucky American Water's Employee Engagement Team.
- 2018-2021 Culture Survey Team committee member at Kentucky American Water.
- Responsible for public outreach in stormwater communities and presentations to city/county governments.
- Presented technical and informational sessions at statewide conferences and training seminars.

PROFESSIONAL EXPERIENCE

Kentucky American Water Lexington, KY (2017-Present)	<i>Engineering Project Manager, 2017-Present:</i> Head of 3-person Planning Department within Engineering; responsible for delivery of capital projects within KAW treatment and distribution systems; oversee project budgets totaling more than \$10 million per year; assist Production and Distribution teams with issues requiring engineering solutions; serve on company's Culture Survey Team; founding chair of company's Engagement Team; volunteer with company public outreach.
CDP Engineers Lexington, KY (2009-2017)	<i>MS4 Program Leader, 2014-2017:</i> Served as Stormwater Manager/Civil Engineer for all municipal and private infrastructure-related projects. Administered stormwater programs in eleven Phase II communities (two universities, including UK) statewide including: coordinating public outreach, maintaining state permit compliance, performing system mapping, managing data inventory, completing annual reporting, providing staff training, evaluating fiscal impacts, conducting site inspections, drafting city- or county-wide protocol plans, and overseeing communications with technical staff, elected officials, and general public. <i>Water/Wastewater Department, 2009-2014:</i> Primarily in charge of design and drafting construction documents (drawings, technical specifications, cost estimates) for small- to mid-size municipal water and sanitary sewer lines and pump stations. <i>Transportation Department, 2011-2014:</i> Prepared construction plans for road expansions and utility relocations in conjunction with roadway work.
University of Kentucky Lexington, KY (2007-2008)	Researched the effect of passengers on elderly drivers and published findings; served as full-time TA for Introduction to Transportation Engineering course; President of UK student chapter of Institute of Transportation Engineers.

EDUCATION AND PROFESSIONAL LICENSE

Professional Engineer, #119973	State of Tennessee (2017)
Professional Engineer, #29436	State of Kentucky (2013)
Masters of Business Administration	Western Kentucky University (current)
Masters of Science in Civil Engineering	University of Kentucky (2008)
Bachelor of Engineering, Cum Laude	Vanderbilt University (2007)

ORGANIZATIONS AND PRESENTATIONS

Kentucky Society of Professional Engineers (KSPE)	<i>Statewide Educational Outreach Chair, 2018-Present:</i> Responsible for a statewide committee of engineers working to provide connections between those in engineering fields and schools/organizations that work with students to encourage interest in engineering. <i>Leadership PE, 2018-2019 Class:</i> Leadership P.E. is a leadership development program designed to encourage, strengthen and build the professional careers and the civic involvement of entry- and mid- to upper-level engineers.
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Krista E. Citron, PE

krista.citron@amwater.com, 859.268.6352

Bluegrass Regional Alliance for Stormwater Success (BRASS)

Program Director, 2014-2017: Hosted quarterly meetings and training sessions for community representatives addressing common stormwater management issues; participated in workgroup session with KY Division of Water decision-makers.

Kentucky Stormwater Association (KSA)

Vice President/Secretary, 2014-2018: Coordinated membership drives, maintained Board meeting minutes, led organizational strategic planning, organized quarterly meetings for 200+ member organizations, assisted with planning and execution of annual conferences.

Presented

"Top 10 Reasons to Map Your MS4," KSPE Monthly Meeting, 2019
"KAWC's Critical Infrastructure Relocation along Brannon Road," KSPE & WPC Annual Conferences, 2018
"Data and Asset Management for Stormwater Communities," various technical conferences and webinars, 2014-2016
"Kentucky Stormwater Management," Half Moon Education Seminars, 2014

COMPUTER SKILLS

Microsoft Office Suite

AutoCAD Civil 3D 2012

Microstation, InRoads

VOLUNTEER WORK

Fayette County Public Schools: Operation Preparation Presenter & Elementary Science Fairs Judge; Future City Competition Judge; Kentucky Stormwater Association; Vanderbilt alumni interviewer, frequent KSA and KAW mascot.

RELEVANT EXPERIENCE

QIP KAW Service Area, KY 2019-present

The Qualified Infrastructure Program (QIP) addresses aging infrastructure by accelerating replacement rates across KAW's footprint. Serving as the engineering manager in charge of overseeing program; supervising construction projects; and tracking financial information.

Risk & Resiliency Study Lexington, KY 2020

Lead for Kentucky American Water's 2020 EPA Risk & Resiliency Study, a guiding document for system capacities and vulnerabilities.

High Service Pumps Replacement KRS-1 WTP, KY 2017-2019

Project Manager for final design and construction. This project replaced three older, constant speed pumps at our primary treatment plant with new, vertical turbine pumps with Variable Frequency Drives (VFDs) for greater efficiency and reliability. Replacement of the three pumps and associated work had a total cost of just over \$4.5 million.

Clark County Water Main Extensions Clark County, KY 2017-2018

Project Manager for design and construction of 24,000 LF main extension project in Clark County. This project created several feed loops and provided improved water quality and pressures for a rural area. The total project cost was \$1.85 million.

REFERENCES

Brent O'Neill, Director of Engineering, Illinois American Water

859-321-8235 brent.oneill@amwater.com

Scott Southall, President, EarthCycle Design

859-221-9067 bsouthall@ecdsite.com

Frank Pruitt, Senior Engineering, Banks Engineering

859-881-0020 fpruitt@banksengineering.net

Todd Wright

WORK EXPERIENCE

May 2020 to Present	<u>American Water Works Service Company, Inc.</u>	Camden, NJ
<p>Senior Manager – Regulatory - responsible for managing, reviewing, and supporting rate case preparation and regulatory filing processes.</p> <ul style="list-style-type: none">-Directly supports regulatory activities in IL, KY, & TN.-Prepares and reviews rate case support schedules, testimony, and exhibits.-Ensures timely and accurate filings on all regulatory matters (Infrastructure, revenue and expense mechanisms).-Supports and develops team members and provides flexible support to colleagues in the division, in other divisions, as well as the Regulatory Services team.		
Aug 2013 to April 2020	<u>American Water Works Service Company, Inc.</u>	Cherry Hill & Camden, NJ
<p>Financial Analyst - Regulatory - responsible for analyzing and supporting rate case preparation and regulatory filing processes.</p> <ul style="list-style-type: none">-Involved in providing support to the regional regulatory teams and data requests.-Prepared and enhanced MO revenue requirement model.-Supported testimony in multiple jurisdictions.-Collaborated on TN alternative rate mechanisms filings and annual reconciliations from 2015-2020.-Assisted in infrastructure surcharge mechanisms in MO, IA, & IN.-Participated in regulatory filings and analysis for the implementation of TCJA in various arenas.-Pursued new avenues for rate support data processes.		
Jan 2013 to Jul 2013	<u>American Water Works Service Company, Inc.</u>	Cherry Hill, NJ
<p>BSS Lead Analyst - responsible for managing and participating in transition of long term support for SAP R1 & R2 go-lives.</p> <ul style="list-style-type: none">-Involved in providing support to the business for RTR, PTP & HTR and defect resolution.-Developed load programs for master data to improve BSS support activities for WBS elements and settlement rules.-Partnering with Powerplan Team to provide support to UPA.		
Dec 2010 to Jan. 2013	<u>American Water Works Service Company, Inc.</u>	Voorhees, NJ
<p>BT Project SME – RTR - responsible for helping deliver SAP implementation across the business for RTR. Primary focus on the project involved PS/CO and integration to Hyperion and Powerplan.</p> <ul style="list-style-type: none">-Involved in leading workshops and coordinating requirement gathering.-Developed cost flow model for O&M and Capex accounting for PS/CO with integrated reporting.-Participated in design, data conversion, build, test, and training during project lifecycle.-Partnered with BTIP teams for design and interface development for external systems of Hyperion System 9 and Powerplan.		
April 2009 to Dec. 2010	<u>American Water Works Service Company, Inc.</u>	Cherry Hill, NJ
<p>UPA Supervisor responsible for supervising four Utility Plant Accountants for the Western Region States. Other responsibilities included administering the Powerplan software and participating in SSC Shared Services leadership activities.</p> <ul style="list-style-type: none">-Involved in monthly, quarterly, and annually FRC for UPA.-Developed skill sets in employees through coaching and knowledge transfer techniques.-Managed PUC and rollforward processes for UPA Western entities.-Assisted in reconciliation clean-up and automation process improvements.		
Jan 2007 to April 2009	<u>American Water Works Service Company, Inc.</u>	Voorhees, NJ

Senior Financial Analyst responsible for operating and administrating Hyperion S9 related to the consolidation module (HFM) and planning/budgeting. Also involved in consolidating the plans, budgets, & re-forecasts as well as project work related to process improvements.

- Involved in validating financial data loads, calculations, and reconciliations to source systems including JDE, Great Plains, and Deltek for HFM and other SOX related tasks for Financial Reporting mega process.

- Developed reports, adhoc tools, and guidance to Corporate Accounting & Regions.

- Managed planning project to integrate financial statements within Hyperion S9 with automated cash flow statements for 5-year AW consolidated plans and 2009 operating budget.

- Assisted in multiple finance activities related to consolidated planning presentations, analysis and SEC document preparation.

Sept. 2004 to Jan. 2007

[American Water Works Service Company, Inc.](#)

Mount Laurel, NJ

Senior Financial Analyst responsible for planning and reporting on American Water Service Company.

- Developed and established 2006 budgets for Service Company with functional highlights and supporting detail.

- Implemented process improvements for monthly variance analysis with regards to Service Company and monthly regional billing requests.

- Provided and displayed customer service to both internal and external customers of the Service Company and related entities.

- Assisted Service Finance Director in Business Plan deliverables and Divisional presentations.

- Promoted to Senior Financial Analyst in April 2005.

Oct. 2001 to Sept. 2004

[American Water Works Service Company, Inc.](#)

Mount Laurel, NJ

Senior Fixed Assets/Job Cost Accountant responsible for maintaining, processing, tracking, and reporting on all utility plant in service and capital expenditures for specified states.

- Settled supporting schedules for financial statements as well as reconciliation of the fixed assets' accounts.

- Assisted in process improvements for the department to increase visibility, accuracy, and user friendliness.

- Participated in various projects as part of current business realignment and transformation.

- Assisted in the conception on how to track costs/savings for a procurement initiative.

- Promoted to Senior Accountant in October 2002.

July 1997 to July 2001

[TA Associates Realty](#)

Boston, MA

Portfolio Accountant responsible for all operational and financial accounting activities associated with private real estate investment trusts.

- Provided year-to-date financial statements, including consolidations, yield analysis and budget comparisons, for several entities.

- Assisted in disposition of real estate assets within the related portfolios.

- Updated quarterly Internal Rate of Returns for all assets under management.

- Interacted with sub-contracted property management companies for day-to-day operations.

EDUCATION

[Northeastern University](#)

- Bachelor of Science in Business Administration, June 1997

COMPUTER SKILLS

SAP, Powerplan, SharePoint, Hyperion System 9; Hyperion Enterprise; JDE Edwards; Microsoft Office, Microsoft Teams