

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NORTHERN	)	
KENTUCKY WATER DISTRICT FOR A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	CASE No.
AND NECESSITY TO REPLACE ITS EXISTING	)	2021-00095
AUTOMATED METER READING ("AMR") METERS	)	
WITH ADVANCED METERING INFRASTRUCTURE	)	
("AMI") AND ISSUANCE OF A BOND	)	
ANTICIPATION NOTE	)	

**ATTORNEY GENERAL’S INITIAL DATA REQUESTS**

The Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“the AG”), hereby submits the following Initial Data Requests to Northern Kentucky Water District (“NKWD,” or “the Company”), to be answered by the date specified in the Commission’s Orders of Procedure, 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 request 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. The AG can provide counsel for NKWD with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the Companies receive or generate 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, request clarification directly from Counsel.

(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, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the Companies have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify counsel for the AG as soon as possible.

(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 Companies, 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,  
DANIEL CAMERON  
ATTORNEY GENERAL



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*Certificate of Service*

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record. Further, the Attorney General will submit the paper originals of the foregoing to the Commission within 30 days after the Governor lifts the current state of emergency.

This 23<sup>rd</sup> day of April, 2021



Assistant Attorney General

Electronic Application Of Northern Kentucky Water District For A  
CPCN To Replace Its Existing Automated Meter Reading ("AMR") Meters  
With Advanced Metering Infrastructure ("AMI") And Issuance Of A Bond Anticipation Note  
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1. Identify all water utilities in the Commonwealth known to NKWD that have implemented metering systems that utilize one or more components based on AMI technology.
2. Provide the remaining useful life of the Badger Orion Mobile Automated Meter Reading System.
  - a. If the existing AMR system has not been fully depreciated, explain: (i) how NKWD proposes to recover those stranded costs; and (ii) whether the stranded costs were taken into consideration in any cost-benefit analysis NKWD may have conducted.
3. Provide the remaining useful lives of NKWD's current meters.
4. Confirm that in the instant application, NKWD proposes only to procure and install new transmitters that utilize AMI technology onto its existing meters, and that the Company intends to retain its current meters.
  - a. If not confirmed, explain whether the proposed CPCN will include new AMI meters that have communications modules.
  - b. If NKWD will be filing a separate CPCN application for installation of new meters, provide an estimate for when that filing will be made.
5. Provide a discussion regarding what due diligence NKWD conducted as to determining whether any other brands of transmitter units compatible with the Badger Orion Mobile Automated Meter Reading System are still being manufactured.
6. Confirm that NKWD is proposing to construct its own communication network system for the proposed AMI transmitters.
7. Confirm that NKWD currently transmits its water consumption data to Sanitation District No. 1 of Northern Kentucky (SD1), and that SD1 sends separate wastewater bills to its customers based on those customers' consumption of NKWD water.
  - a. Confirm that SD1 is not jurisdictional to the Kentucky Public Service Commission.
  - b. Explain how SD1 would benefit from the AMI module deployment.
8. Explain what due diligence NKWD conducted as to whether it would be more cost-effective to utilize existing cellular systems such as Verizon or AT&T for its communication network. If any, provide the results of that due diligence.

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9. Provide a discussion on the extent of NKWD's due diligence investigations regarding the possibility of "piggybacking" onto the AMI networks of Duke Energy and Owen RECC, in lieu of constructing NKWD's own AMI data transmission system.
  - a. Include in your discussion whether any cost-benefit analyses of such an option were conducted, and if so, provide copies.
  - b. Explain why only the potential for piggybacking onto Owen RECC's network was modelled in Scenario 8, and why the potential for piggybacking onto Duke Energy's network was not modelled.
  - c. Reference p. 25 of the Meter Reading Study, wherein it is stated: "Refinement of this cost through continued discussions with Owen Electric is needed to better understand how it compares with other options." Provide an update on NKWD's discussions with Owen.
10. Confirm that NKWD's RFP was conducted as a joint basis with the City of Florence (Florence). If so confirmed:
  - a. Confirm that Florence is not jurisdictional to the Kentucky Public Service Commission.
  - b. Explain whether NKWD has considered partnering with either SD1, and/or Florence in deploying the AMI modules. If not, explain fully why not.
  - c. Provide a copy of the "Interlocal Cooperation Agreement" referenced on p. 4 of the RFP.
11. Provide a list of bids received from NKWD's RFP regarding an AMI transmitter system.
12. Explain whether NKWD conducted any due diligence as to utilizing a new all-AMR meter reading system, together with attendant costs.
13. Provide a discussion regarding the degree to which the proposed new AMI module system is compatible with NKWD's current billing, customer service, and other systems. Include in your discussion the extent to which NKWD considered interoperability between its existing systems and the proposed AMI modules, together with the potential for obsolescence.
14. Explain whether NKWD has considered the possibility of providing billing and customer service on a joint basis with Florence. Include in your response a discussion of whether the proposed joint RFP with Florence could enhance possibilities for conducting billing, customer service, and perhaps other operations on a joint basis with Florence.

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15. Explain whether NKWD conducted one or more cost-benefit analyses for the proposed CPCN. If so:
  - a. provide a copy of all such analyses;
  - b. ensure that the analyses indicate the source of all cost savings that the deployment will provide;
  - c. explain whether the analyses included potential savings derived from enhanced leak detection capability of an AMI system;
  - d. explain whether the analyses took into consideration potential synergies and other benefits that could be achieved by conducting one or more aspects of the AMI module deployment (i) jointly with Florence; and / or (ii) any cost contributions that SD1 could make toward the CPCN costs.
16. Provide the estimated lifespan of the AMI meter reading system NKWD has selected.
  - a. Explain whether this lifespan includes any battery that the communications module may use. If not, provide the projected lifespan of the battery.
17. Explain the steps NKWD undertook to insure interoperability of the proposed new AMI meter reading system with NKWD's other existing systems.
18. Explain why NKWD's analysis did not include a status quo scenario.
19. Confirm that most of NKWD's meters are located in underground vaults. If so confirmed, provide a discussion on the difficulties involved with creating a RF network capable of receiving all transmissions from underground meters.
20. In the event the Commission grants the CPCN, explain what NKWD will do with its current meter reading personnel. Provide also the monetary savings in meter reading expense NKWD expects to achieve through the deployment of the AMI modules.
21. Reference the Application, "Project Description," p. 2. Explain how the new meter reading system will enhance customer services.
22. Provide the criteria by which NKWD will determine whether any given customer will have remote shut-off valves (RSV) installed.
23. Confirm that in the current CPCN, NKWD is not also seeking permission to purchase customer portals for its customers.
  - a. Regarding the future potential for customer portals, explain whether the portal would consist of hardware to be installed in each customer's



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premises, or the ability to access customer data via an internet website, over the customer's own computers or other devices.

24. In the event the Commission grants the proposed CPCN, explain whether NKWD proposes to maintain its current meter testing program.
25. Provide NKWD's labor costs for: (i) current shut-offs; and (ii) shut-offs once the proposed AMI system has been installed.