

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|--|---|------------|
| 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 SUPPLEMENTAL DATA REQUESTS

The Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“the AG”), hereby submits the following Supplemental 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,
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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 20th day of May, 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
Attorney General's Supplemental Data Requests
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1. Reference the response to AG 1-20. Explain how staff currently involved in meter reading would be redeployed. Include in your response the exact, existing positions to which such staff would be reassigned, including the title of such positions.
 - a. If no such positions are identifiable at this time, indicate such in your response.
 - b. If new positions will be created for these personnel, explain whether the new positions will be full-time equivalent, and the job responsibilities for each such position.

2. Reference the petition generally.
 - a. Identify all costs associated with the current meter reading program, including but not limited to payroll, benefits, O&M and capital expenditures.
 - b. For each cost category identified in subpart a., above, and assuming the Commission approves the application, provide estimates for how much all such costs will be reduced once the project is fully completed and operational.
 - c. Regarding the anticipated \$177,975.91 savings in annual meter reading expense, provide a breakdown of the types of costs that will be reduced, and by how much.

3. Reference the Meter Reading Study attached as Exhibit A-3 to the petition, page vi, "Recommended Next Steps," the fourth bullet point recommending SD1 share in the program costs. Refer also to the response to AG DR 1-7, wherein NKWD acknowledges SD1 will benefit from the proposed AMI module deployment.
 - a. Confirm that SD1's costs will be reduced once the project is fully completed and operational.
 - b. If so confirmed, provide an explanation of all measures NKWD has taken to secure a commitment from SD1 to share a portion of the project costs.

4. Reference NKWD's response to AG DR 1-14. Explain whether NKWD and Florence have considered discussing potential synergies that might result from merging their water operations.

5. Reference the response to AG DR 1-16, in which the Company states that the estimated lifespan of the AMI meter reading system NKWD has selected is 20 years. Explain whether this lifespan includes: (i) the computer backhaul hardware, firmware and software for the system to operate; and (ii) the communications network hardware, firmware and software.

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6. Reference the response to AG DR-1-21. Explain whether the Company intends to sell or otherwise disclose any of the customer data that the new AMI module system will generate. If so, explain whether the data will be de-identified and aggregated. If the Company has a policy on sharing / selling customer data, provide a copy of that policy.