

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY- )  
AMERICAN WATER COMPANY FOR AN ) Case No. 2021-00434  
ALTERNATIVE RATE ADJUSTMENT )

---

**ATTORNEY GENERAL’S THIRD REQUEST FOR INFORMATION TO  
KENTUCKY-AMERICAN WATER COMPANY**

---

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and submits his Third Request for Information to Kentucky-American Water Company (hereinafter “Kentucky-American” or the “Company”) to be answered by March 28, 2022, 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,

DANIEL J. CAMERON  
ATTORNEY GENERAL



---

ANGELA M. GOAD  
J. MICHAEL WEST  
LAWRENCE W. COOK  
JOHN G. HORNE II  
ASSISTANT ATTORNEYS GENERAL  
1024 CAPITAL CENTER DRIVE, SUITE 200  
FRANKFORT, KY 40601  
PHONE: (502) 696-5421  
FAX: (502) 573-1005  
[Angela.Goad@ky.gov](mailto:Angela.Goad@ky.gov)  
[Michael.West@ky.gov](mailto:Michael.West@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[John.Horne@ky.gov](mailto:John.Horne@ky.gov)

**Certificate of Service and Filing**

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that the foregoing electronic filing was transmitted to the Commission on March 14, 2022, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 14<sup>th</sup> day of March, 2022.



---

Assistant Attorney General

1. Refer to the Supplemental Testimony of Tricia Sinopole (“Sinopole Supplemental Testimony”), page 2.
  - a. Explain in full detail how Kentucky-American calculates its wastewater billing determinants, and why customer counts are not used.
  - b. Explain why the wastewater account data does not currently contain meter size information.
  - c. Explain whether Kentucky-American intends to obtain the meter size information for its wastewater customers so this type of error does not occur in the future.
  - d. Explain what “unrelated analysis” was being performed when the billing determinant error was discovered.
  - e. Explain why the proper research was not performed to have accurate billing determinate information before Kentucky-American filed its application to increase wastewater rates.
  - f. Identify the approximate date that the billing determinant error was discovered.
  - g. Does Kentucky-American acknowledge that the increased wastewater rates proposed in the Sinopole Supplemental Testimony will burden its customers more than the originally proposed rates? Explain the response in detail.
2. Refer to the Sinopole Supplemental Testimony, Amended Notice. Does Kentucky-American agree that the customers should be notified of the amended proposed wastewater rates as soon as possible? Explain the response in full detail.

3. Refer to Kentucky-American’s response to the Attorney General’s Second Request for Information (“Attorney General’s Second Request”), Item 1(b).
  - a. Explain whether customers are always required to pay at least 25% of their bill within 48 hours of signing up for an installment plan. If not, provide the criteria that Kentucky-American utilizes to make the determination that a customer can pay less than 25% of their bill within 48 hours of signing up for an installment plan.
  - b. Provide the criteria that Kentucky-American utilizes to determine the time period allowed for each customer installment plan.
  - c. What is the longest period of time that a customer is allowed to enter into an installment plan for past due wastewater bills? Explain the response in detail.
  - d. Explain whether the one-time extension that customers may request if they need a few extra days to pay a bill is once per a certain time period, or only once for the duration of being a customer.
4. Refer to Kentucky-American’s response to the Attorney General’s Second Request, Item 1(c).
  - a. Kentucky-American states that the H2O Help to Others program is shareholder funded; however, there is mention in this response to customer contributions. Explain in full detail whether customers contribute to the program as well.
  - b. If customers contribute to the H2O Help to Others program, provide the customer contribution amounts from 2015 – 2022.

- c. According to the response, the shareholders have contributed a varied amount from 2015 – 2022. Explain in full detail how the shareholders determine the specific monetary amount to contribute to the program each year.
5. Refer to Kentucky-American’s response to the Attorney General’s Second Request, Item 24. As previously requested, explain in detail whether Kentucky-American has decided what average raise, if any, will be given to salaried and non-salaried employees for 2022, and provide the average raise. If not yet decided, consider this a continuing request.