

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WATER SERVICE)	CASE NO.
CORPORATION OF KENTUCKY FOR A GENERAL)	2022-00147
ADJUSTMENT IN EXISTING RATES AND A CERTIFICATE)	
OF PUBLIC CONVENIENCE AND NECESSITY TO)	
DEPLOY ADVANCED METERING INFRASTRUCTURE)	

**CITY OF CLINTON FIRST REQUEST FOR INFORMATION TO WATER
SERVICE CORPORATION OF KENTUCKY**

Comes now the intervenor, the City of Clinton, and submits its First Request for Information to Water Service Corporation of Kentucky (hereinafter “Water Service Kentucky” or the “Company”) to be answered by the amended scheduled deadline as set by the Kentucky Public Service Commission 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.

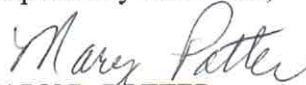
In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(12) 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.

(13) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(14) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,



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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 August 16, 2022, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



MARY B. POTTER

Electronic Application of Water Service Corporation of Kentucky
for a General Adjustment in Existing Rates and a Certificate of Convenience and Necessity
to Deploy Advanced Metering Infrastructure

Case No. 2022-00147

1. At a meeting held at City Hall, a representative of Water Services Corporation of Kentucky, stated that Water Services Corporation of Kentucky would be replacing one (1) mile of water pipe within the City each year. Please document the miles of water pipe that have been replaced since that meeting.
2. Water Services Corporation of Kentucky has not completed repair projects in the City of Clinton. For each of the locations following, please state the reason for the delay in completion, the person or persons responsible for completing the work, the date of anticipated completion.
 - A. Ezell Lane:
 - B. College Street:
 - C. Barclay Street:
 - D. Barnt driveway – Ezell Lane – customer complaint March 2022
 - E. Clinton Apartments – street repair
3. In response to AG DR 1-9, Water Services of Kentucky responded that it provides monthly reports to the City of Clinton. Clinton receives two reports monthly and it is unclear which report is in response to the question and that the City of Clinton uses the reports to prepare wastewater billing. Please provide copies of the report referred to in this Response.
4. Please explain why two reports for the same customers that differ extensively are sent to the City each month. Which report does Water Services of Kentucky intend to be the correct report for use in preparing wastewater billing.

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5. The City of Clinton utilized a grant to purchase the meters currently in use in Clinton. It is the position of the City of Clinton that the meters belong to the city. Is that the understanding of Water Services Corporation of Kentucky?
 - A. If allowed to replace the current meters, will Clinton be reimbursed for meters that are removed?
 - B. If the ownership of the meters is disputed, please explain the rationale for Water Services Corporation of Kentucky claiming ownership of the current meters.
6. Please explain how advanced metering will be of assistance to the water customer in Clinton.
7. If allowed to install advanced metering, how will that affect sharing usage information with the City of Clinton?
8. If there are plans for replacement of the aging water lines in the City of Clinton, please share those plans and the person tasked with completing replacement.
9. If there are plans to extend water lines farther beyond the boundaries of Clinton than already are in existence, please provide those plans and the person tasked with overseeing expansion of the water system.
10. In response to AG DR 1-10, the number of customers in Clinton was stated to be 572. Has the number of customers increased or reduced since the last two water rate increases in 2018 and 2020?
 - A. Provide the number of customers in 2018.
 - B. Provide the number of customers in 2019.

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- C. Provide the number of customers in 2020.
 - D. Provide the number of customers in 2021.
 - E. Provide the number of customers in 2022.
11. In the previous case, 2020-00160, in response to the submitted testimony of Shannon Payne, Stephen Vaughn testified that the water offices were closed because of pandemic restrictions. The office remains closed to the public with doors locked.
- A. When does the Company intend to reopen the office to the public?
 - B. There is a drop box for payments. Cash payments are not accepted. When does the Company plan to accept cash payments?
 - C. How often do company employees check the drop box for payments?
 - D. How long is the average time from payment to recording of Clinton water resident payments?
 - E. Have Clinton customers received cut-offs or late notices because their payment has not been processed?
 - F. City employees collected water bill payments until March 1, 2022. Since the City no longer collects water payments, has the company made an effort to find a third party to collect water bill payments? If so, who has been contacted and why has no one been employed to provide that service?
12. What is the mechanism if a Clinton water customer has an issue with water service?
- A. What are the channels for handling a customer complaint?
 - B. Tracey Pirtle of Barclay St. has complained about water pressure issues. What is being done to address her complaint?

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13. It was discovered by fire department personnel on or about May 17, 2022, that the hydrant located on Moss Drive behind Intermediate Care Facility, a nursing home in Clinton, was shut off.
- A. Has that issue been corrected?
 - B. When was it addressed?
 - C. Provide the documentation related to the issue above.
 - D. Is it true that the hydrant had been shut off for six months?
14. Several hydrants in Clinton have been designated not for use by the Clinton Fire Department.
- A. Provide a map and a list of the hydrants available for use by the Clinton Fire Department.
 - B. Provide a list and a map of those hydrants designated not to be used by the Clinton Fire Department.
 - C. Provide the plan to provide additional hydrants to protect property presently not protected under 14 (B).
15. Hydrants were to be repainted to reflect whether they could or could not be used by the Clinton Fire Department or other fire responders.
- A. How many of the hydrants been repainted?
 - B. If not all repainted to designate their status, how many have not?
 - C. What is the timeline to complete that work?
16. Has the leak in the Garan building on Highway 51 been dealt with? If so, when was it repaired?

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17. The City of Clinton received a printed out letter on August 11, 2022, dated August 2, 2022, from the Division of Water of an email to Chris Cannon with Water Services Corp. The letter stated the City of Clinton had not filed a plan for infrastructure at wastewater plant since 2018. Management of the wastewater system was being provided by Water Services Corporation of Kentucky. Why are communications not delivered or forwarded to the City of Clinton in a timely manner?
18. The letter referenced in Question #17 was sent by the Division of Water eight months after the City of Clinton took over control of the wastewater system. What steps has Water Service Corporation of Kentucky taken to notify the Division of Water that it is no longer the manager of Clinton's wastewater system.
19. For what price would Water Service Corporation of Kentucky sell the Clinton water system?
20. Explain the benefit of advanced metering. What additional cost will advanced metering be to Clinton water customers?
 - A. To the residential Clinton water customer.
 - B. To larger users like Hickman County School District.
 - C. Will fewer water company employees be needed in Clinton if advanced metering is granted by the PSC?
21. Water customers in Clinton receive their bills from a return address in Altamonte Springs, Florida. Payments sent by mail go to Philadelphia Pennsylvania. A Google search shows the corporate address to be Chicago Illinois.
 - A. Are there Water Service Corporation employees at each location who handle specific

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customer complaints?

B. In what office are customer complaints received?

C. What is the process of getting customer service issues from those receiving the notice
to repairpersons?

22. If advanced metering is granted and installed, how will this affect customer complaints
on issues like leaks and overbilling?

23. In the past, exceptions were made for leaks and pool fillings, will those exceptions be
unavailable with deployed advanced metering infrastructure?