

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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**ATTORNEY GENERAL’S POST-HEARING REQUEST FOR INFORMATION TO  
WATER SERVICE CORPORATION OF KENTUCKY**

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Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and submits his Post-Hearing Request for Information to Water Service Corporation of Kentucky (hereinafter “Water Service Kentucky” or the “Company”) to be answered by December 9, 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



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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 December 2, 2022, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 2<sup>nd</sup> day of December, 2022.

*Angela M. Aoad*

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Assistant Attorney General

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. Refer to the Supplemental Direct Testimony of Quentin M. Watkins (“Watkins Testimony”), pages 3 – 4. According to Mr. Watkins’ wage and salary study, Water Service Kentucky’s total compensation package including salary and health and retirement benefits for 2022 is 8% above the market midpoint. However, Mr. Watkins did not provide how Water Service Kentucky’s total compensation package including salary and health and retirement benefits for 2023 compares to the market midpoint. Provide how Water Service Kentucky’s total compensation package including salary and health and retirement benefits for 2023 compares to the market midpoint, and include the detailed analysis of the same.
2. Refer to Water Service Kentucky’s response to the Attorney General’s Second Request for Information (“Attorney General’s Second Request”), Item 64. Provide the most current per gallon price of unleaded and diesel gas at the local stations utilized by Water Service Kentucky and the date in which the price is determined. In addition, provide an updated calculation of the projected fuel expense, utilizing these more current prices, in electronic format with all formulas in place.
3. Refer to the Rebuttal Testimony of James Kilbane (“Kilbane Rebuttal”), at page 4. Mr. Kilbane quantified health insurance costs for employees located outside of Kentucky as \$15,991 for the base period. Provide the workpapers associated with this quantification of health insurance costs.
4. Refer to the Attorney General’s First Request for Information (“Attorney General’s First Request”), Item 113. Provide the date that the Field Tech 1 position was filled.

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5. Explain whether the Company projected less outside contractor expense in the forecasted test period as an expense savings due to the proposed Advanced Metering Infrastructure (“AMI”) freeing up the time of meter readers.