

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2022-00299
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Heather Hoelting

1. Refer to Kentucky-American's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1(c).
 - a. Provide the dollar amount threshold(s) that would generate a manual review by the billing team.
 - b. Explain under what circumstances a letter would be issued and under what circumstances a read for billing service order would be issued.
 - c. Explain whether any of the correspondence sent to customers regarding unusual deviations from historical usage specifically informs customers of their right to request a meter test pursuant to 807 KAR 5:006, Section 19. If not, why not.
 - d. Explain the timeline for meter reading, billing, company review, and customer notification compared to when the customer payment is due. Explain whether the timeline would change if the customer participates in either electronic communications or automatic payments.

Response:

- a. A manual review may be initiated by a customer without any threshold. There may also be instances where KAW's billing team initiates a manual review without a threshold, such as to address a previous billing problem for a customer. KAW's computer system automatically generates high bill notices and a manual review as explained in more detail in response to PSC 2-1(c). Manual review is initiated automatically at a \$5,000 or 6 times consumption threshold.
- b. As noted in the response to PSC 2-1(b), a high bill letter is automatically generated by KAW's computer system when a customer's usage is reported as 2.5 times higher than the previous year's period or 200% and \$200 higher than the prior year's period. A manual read for billing or "RBL" is generated automatically if consumption exceeds 6x the previous year or \$5,000. Customer requests or noted account problems may also generate RBL orders.

- c. KAW's tariff, which includes its rules and regulations, informs customers that they may request a meter test annually and provides the process on how the customer may make this request (see KAW's tariff, First Sheet 12, Section 6.1(g)) in accordance with 807 KAR 5:006, Section 19. The correspondence provided in response to AG 1-15 does not advise a customer of his ability to request a meter test because that is not the purpose of that correspondence. Rather, the purpose of that correspondence is simply to advise of unusual usage. Additionally, during phone calls with customers regarding billing or usage disputes, KAW's customer service personnel regularly advise customers of their right to request meter testing.

- d. All KAW customers have a meter read schedule. Field Service Representatives have 3 days from that schedule to read the meter before the billing system prepares estimates due to an inability to get a read. Once the read or estimate occurs, KAW's billing team has 7 days to try and resolve any issues and release the invoice. Once the invoice is released, the customer has 15 days before the payment is due. There is no difference in payment terms or timeline of billing process based on how the customer is notified of their bill or if they have electronic payment on their account, other than postal delivery time.

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CASE NO. 2022-00299
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Heather Hoelting and Andy Lewis

2. Refer to Kentucky-American's response to Staff's Second Request, Item 5, Attachment KAW_R_PSCDR2_NUM5_021023_ATTACHMENT 1, PSC 2-5 Pivot tab. Several rows have the same number in consecutive columns. Explain why the same number would be in consecutive columns. For example, in Row 32, the number 5 appears in columns 2018-01 through 2018-05.

Response:

In reference to KAW's response to PSC 2-5, Attachment KAW_R_PSCDR2_NUM5_021023_ATTACHMENT 1, PSC 2-5 Pivot tab, several rows may have the same number in consecutive columns due to data records with no contract account numbers, meaning there was no customer at the time of the estimated meter reading. For example, in Row 32, the number 5 appears in columns 2018-01 through 2018-05 because the data records for that premise and installation do not have a contract account number. A bill would not be created for a premise and meter installation that do not have a contract account number. Therefore, while there may be an estimated read, the data presented did not necessarily reflect a customer who received an estimated bill. Please also see KAW's Supplemental Response to PSC 2-5 filed contemporaneously herewith with updated data.