

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF	)	
KENTUCKY-AMERICAN WATER COMPANY'S	)	CASE No.
ALLEGED VIOLATION OF A TARIFF AND	)	2022-00299
COMMISSION REGULATIONS REGARDING	)	
METERS AND MONITORING CUSTOMER USAGE	)	

**ATTORNEY GENERAL'S INITIAL DATA REQUESTS**

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention ["OAG"], hereby submits the following Initial Data Requests to Kentucky-American Water Company ["KAW" 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 OAG can provide counsel for KAW with an electronic version of these questions in native format, 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 for OAG.

(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 OAG 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 electronic volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations and Orders.

(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 CAMERON  
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.

This 27<sup>th</sup> day of January, 2023



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Assistant Attorney General

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Commission Regulations Regarding Meters And Monitoring Customer Usage  
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1. Provide the total number of monthly bills KAW estimated as a result of the meter problem(s) which are the subject of this investigation. If the exact number is not known, provide the best estimate. The total should be based on the number of actual bills, not the number of customers affected.
2. For each automatic meter read ("AMR") meter that experienced more than one estimated bill, explain for how many additional consecutive months the usage level for each such meter continued to be estimated.
3. For each estimated AMR meter read from January 1, 2018 to date, provide the reason an estimation was made, as mandated in 807 KAR 5:006 § 7(5)(d).
4. Provide the total number of KAW radio receivers ("radio read devices") the Company replaced or repaired as a result of the problems which are the subject of this investigation.
5. Explain what sort of damage the radio read devices were susceptible to.
  - a. Explain whether any damaged radio read devices were covered under manufacturer warranty, and if so, whether the warranty provided any coverage for the type of damage the devices incurred.
  - b. Explain whether KAW required customers to pay for any damages to the radio read devices. If so, provide the total number of customers so charged, and provide the average sum each customer was charged.
6. Provide the total number of Meter Interface Units ("MIU"), which transmit usage information to KAW radio receivers, the Company had to repair or replace as a result of the problems which are the subject of this investigation.
7. Explain what sort of damage the MIU devices were susceptible to.
  - a. Explain whether any damaged MIU devices were covered under manufacturer warranty, and if so, whether the warranty provided any coverage for the type of damage the devices incurred.
  - b. Explain whether KAW required customers to pay for any damages to the MIU devices. If so, provide the total number of customers so charged, and provide the average sum each customer was charged.
  - c. Explain whether the MIU is integrated into the AMR meter itself, or is a separate component attached to the AMR meter. If separate, explain whether the MIU is powered via battery, and provide the depreciable lifespan of the battery.

8. Provide the total number of AMR meters replaced from January 1, 2018 to date.
  - a. Explain whether any damaged AMR meters were covered under manufacturer warranty, and if so, whether the warranty provided any coverage for the type of damage the meters incurred.
  - b. Explain whether KAW required customers to pay for any damages to the damaged AMR meters. If so, provide the total number of customers so charged, and provide the average sum each customer was charged.
9. Provide the total number of meters that were serviced from January 1, 2018 to date. Provide also a breakdown of the issues addressed in servicing the meters.
10. Explain whether any of KAW's meter reading equipment was ever found to be faulty or damaged in some way. If so: (i) explain whether any of that equipment was under a warranty, and (ii) if "yes" to subpart (i), explain whether the warranty provided any coverage for the type of faulty or damaged equipment parts.
11. Confirm the following regarding KAW's Tariff Sheet 13, 6.1(j):
  - a. The Company is required to collect usage information of each customer and compare the usage to the historical usage of that customer; and
  - b. If it appears there is an unusual deviation, the Company is required to notify the customer to determine the source or cause for the unusual usage.
12. Beginning in January 1, 2018, explain how KAW assessed and determined the level of its customers' usage.
  - a. Explain also whether the actions KAW employs to assess and determine customer usage levels have changed since January 1, 2018. If so, provide a detailed discussion regarding how they have changed.
13. Explain why, if KAW was reviewing usage for unusual deviation, action was not immediately taken to address consecutive usage estimation.
  - a. Include in your response a discussion regarding whether the actions KAW employs to address consecutive usage estimation have changed since January 1, 2018. If so, provide a detailed discussion regarding how they have changed.



14. Beginning in January 1, 2018, explain how KAW assessed and determined whether a usage deviation became unusual enough as to warrant a notification to the customer.
  - a. Include in your response a discussion of whether the actions and measures KAW employs to assess and determine whether a usage deviation is unusual enough as to warrant a notification to the customer have changed since January 1, 2018. If so, provide a detailed discussion regarding how they have changed.
15. Beginning in January 1, 2018, explain how KAW notified affected customer(s) of their unusual usage.
  - a. Explain all measures that KAW instructed the affected customers to take.
  - b. Provide a discussion regarding all measures the Company undertook in following-up on customer communications regarding the notification of unusual usage. Include in your discussion any instances in which the Company failed to properly follow-up on such communications.
  - c. Include in your response a discussion of whether KAW's customer notifications of unusual usage, and the means of providing that notification, have changed since January 1, 2018. If so, provide a detailed discussion regarding how they have changed.
16. Reference KAW's petition filed in Case No. 2016-00394, numerical paragraph 6. Confirm the following statements therein:

“All meters in KAW system are automatic meter read (“AMR”) meters that are read using drive-by technology or manually read in the event of an issue with the AMR technology. The installation of AMR meters has eliminated the need for meter boxes to be accessed unless equipment failure occurs and the meter or radio requires repair or replacement. If meters and meter settings are not functioning properly, KAW would either be notified by the customer or be alerted by an abnormal change in a customer's usage. The KAW billing system has triggers in place to provide alerts of potential issues, including two consecutive estimates, three consecutive zero usage reads, or abnormal over or under usage on a bill. Thus, in essence, KAW acquires and analyzes meter functioning data as often as every month when meters are read.”

If so confirmed:

- a. For each instance in which KAW was unable to read a meter for the reasons being investigated in the instant investigation case, provide

- all records KAW made regarding the dates and times the meter reading attempts were made, and the reason(s) the meter could not be read.
- b. Explain whether any accounts that were affected by the issues which are the subject of the instant investigation case, and which had usage: (i) equal to or greater than two times the usage for the same period for the previous year; and (ii) which could not readily be attributed to an identified common cause, were billed prior to the Company re-reading the meter.
  - c. Explain the back-up systems KAW had in place to physically read AMR meters in the event of "an issue with the AMR technology."
  - d. Explain whether since January 1, 2018, KAW was required to access meter boxes.
  - e. Explain whether since January 1, 2018, any failures occurred in AMR meters, radio transmitters, or radio reading devices.
  - f. Explain whether KAW was alerted to improperly functioning AMR meters or AMR meter settings either by the customers, abnormal usage changes, or estimated readings.
  - g. Explain whether the KAW billing system triggers performed as anticipated and as represented in Case No. 2016-00394.
  - h. Explain whether KAW was collecting AMR meter functioning data for each AMR meter at issue in this investigation case, and if so, how frequently the data was collected.
17. Explain whether at all times relevant to this investigation case, KAW was in compliance with its obligations pursuant to: (i) 807 KAR 5:006 § 7(5)(a), which states, in pertinent part: ". . . each utility, except if prevented by reasons beyond its control, shall read customer meters at least quarterly;" and (ii) when applicable, with 807 KAR 5:006 § 7(5)(b), which states: "Each customer-read meter shall be read manually, at least once during each calendar year."
- a. Provide the number of meters for which KAW for whatever reason did not: (i) read a meter at least quarterly; and/or (ii) read a customer-read meter manually at least once annually.
  - b. Provide the number of meters for which estimated readings were conducted in excess of three (3) consecutive estimated readings.
18. Reference the petition in Case No. 2016-00394, numerical paragraph 7, in which KAW provided projected cost savings if the Commission granted the deviation at issue in the case. Provide the additional expense KAW incurred to address the complaints that gave rise to the instant investigation case, as well as the costs it incurred to fix / repair the problems KAW identified.

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19. Provide the number of field service work orders that expired out of KAW's system without having been worked by a field employee. For each such field service work order:
  - a. provide the length of time between when the issue was first reported until it was eventually addressed.
  - b. provide the nature of the problem that was addressed.
20. Explain whether KAW, or any contractors on its behalf, conducted any type or sort of report(s), study (or studies), or audit(s) to investigate the cause(s) of the AMR meter reading issues at issue in this case. If so, provide a copy of all such reports / studies / audits.
21. Provide a discussion regarding all remedial actions KAW took to address the problems which are the subject of the instant investigation case. Include in your discussion whether any of the problems are continuing.