

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY-)
AMERICAN WATER COMPANY FOR AN)
ADJUSTMENT OF RATES, A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY) CASE NO. 2023-00191
FOR INSTALLATION OF ADVANCED METERING)
INFRASTRUCTURE, APPROVAL OF CERTAIN)
REGULATORY AND ACCOUNTING)
TREATMENTS, AND TARIFF REVISIONS)**

**KENTUCKY-AMERICAN WATER COMPANY’S POST
HEARING DATA REQUESTS
TO THE ATTORNEY GENERAL AND
LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT**

Kentucky-American Water Company (“Kentucky American Water” or “Company”) respectfully submit the following data requests to the Office of the Attorney General (“AG”) and Lexington-Fayette Urban County Government (“LFUCG”) to be answered by December 22, 2023 as specified in the post hearing procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 14, 2023.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, Joint Intervenors, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if Joint Intervenors receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If AG or LFUCG object to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground 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.

8. In the event any document requested has been destroyed or transferred beyond the control of AG or LFUCG, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of or active link to the document rather than a reference to the record where the document is located.

Data Requests

Witness: Mr. Meyer

1. Reference Table GRM-1 at page 5 of Mr. Meyer's September 29, 2023 testimony. Given Mr. Meyer's December 11, 2023 hearing testimony regarding line 3 of that table for "Labor Adjustment" and the capitalized payroll cost component of that "Labor Adjustment," please provide an updated Table GRM-1 with Mr. Meyer's current position as to the amount for "Labor Adjustment" and please provide an itemized breakdown of all components of his current "Labor Adjustment" amount.

Witness: Mr. Meyer

2. Reference Table GRM-1 at page 5 of Mr. Meyer's September 29, 2023 testimony and pages 5-6 of that testimony. For the \$6.733 million adjustment for "Rate of Return," please provide an itemized breakdown of that amount including how much is attributable to an ROE of 9.4% and how much of it is attributable to an equity ratio of 50%.

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BY: 
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CERTIFICATE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on December 15, 2023; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

STOLL KEENON OGDEN PLLC
BY: 
Attorneys for Kentucky-American Water Company