

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

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**ATTORNEY GENERAL’S POST-HEARING REQUEST FOR INFORMATION TO  
KENTUCKY-AMERICAN WATER COMPANY**

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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 the Post-Hearing Request for Information to Kentucky-American Water Company (hereinafter “Kentucky American” or the “Company”) to be answered by December 22, 2023, 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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ANGELA M. GOAD  
J. MICHAEL WEST  
LAWRENCE W. COOK  
JOHN G. HORNE II  
ASSISTANT ATTORNEYS GENERAL  
1024 CAPITAL CENTER DRIVE, SUITE 200  
FRANKFORT, KY 40601  
PHONE: (502) 696-5421  
FAX: (502) 564-2698  
[Angela.Goad@ky.gov](mailto:Angela.Goad@ky.gov)  
[Michael.West@ky.gov](mailto:Michael.West@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[John.Horne@ky.gov](mailto:John.Horne@ky.gov)

**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 14, 2023, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 14<sup>th</sup> day of December, 2023,



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Assistant Attorney General

Electronic Application of Kentucky-American Water Company for an Adjustment of Rates, a Certificate of Public Convenience and Necessity for Installation of Advanced Metering Infrastructure, Approval of Regulatory and Accounting Treatments, and Tariff Revisions  
Case No. 2023-00191

1. Refer to the Rebuttal Testimony of Jeffrey Newcomb, page 2, and Kentucky American's Application, Exhibit 7, Customer Notice. Kentucky American updated its requested rate increase from \$26.1 million dollars to \$25.6 million dollars. Based upon this amended rate increase request, provide updated information that is contained in the customer notice. Ensure to include the updated proposed annual revenue increases by customer class, average monthly bill information, proposed rate increase for all customers, consumption charges, miscellaneous charges, fire protection, etc.
2. Refer to Kentucky American's response to the Attorney General's First Request for Information, Item 40(b). Provide the updated net book value of Kentucky American's meters and include the account number, account name, original cost, accumulated depreciation, net book value, and future accrual requirement.
3. Refer to Kentucky-American's response to the Attorney General's Second Request for Information, Item 10, Attachment, page 2 of 2.
  - a. For the seven vacant positions that were provided in the aforementioned response, provide an update including the following:
    - i. Whether each position is still vacant.
    - ii. If any position has been filled provide the date that the position was filled.
    - iii. Provide the updated salaries and wages and labor related amounts for each position whether the position is still vacant or has been filled.
  - b. Provide all additional positions that have become vacant since the aforementioned discovery response. For each new vacant position provide the position description,

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the salaries and wages, labor related amounts, date the job was created, date the job was vacated, necessity of each position, and the estimated hiring timeline for each position.

4. Explain in detail whether Kentucky-American has ever operated with zero vacancies for a full calendar year from 2018 – 2023. If the Company has operated with zero vacancies for a full calendar year then designate the year and provide supporting documentation regarding the same.