

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)	CASE NO. 2023-00191
OF PUBLIC CONVENIENCE AND NECESSITY)	
FOR INSTALLATION OF ADVANCED)	
METERING INFRASTRUCTURE, APPROVAL)	
OF REGULATORY AND ACCOUNTING)	
TREATMENTS, AND TARIFF REVISIONS)	

**THE ATTORNEY GENERAL AND LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT’S RESPONSE TO THE COMMISSION STAFF’S
POST-HEARING REQUEST FOR INFORMATION**

The Intervenors, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and Lexington-Fayette Urban County Government (“LFUCG”), by counsel, submit the following response to the Commission Staff’s Post-Hearing Request for Information in the above-styled matter.

Respectfully submitted,

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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 21, 2023, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 21st day of December, 2023,



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
The Attorney General and Lexington-Fayette Urban County Government's Response to Commission Staff's Post-Hearing Request for Information

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 1
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Refer to the workpapers filed in response to Kentucky-American's First Request of Information, Item 1. Provide a calculation of rate base, an income statement, and a revenue requirement calculation that supports the proposed revenue requirement adjustments.

RESPONSE:

Please see the attached excel workbook that provides a calculation of revenue requirement, income statement, and rate base on a net-of tax basis. Please note that Table GRM-1, was calculated and presented on a pre-tax rate of return basis, using the Company's proposed Gross Revenue Conversion Factor. Please also note that this information was obtained from the Company's application filing and through discovery responses. As such, the rate base, return, and expense levels as shown would need to be updated for all changes made in Kentucky-American Water's rebuttal filing, including but not limited to the Company's correction of data related to capitalization rates.