

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 KENTUCKY-AMERICAN WATER COMPANY’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 Kentucky-American Water Company’s Post-Hearing Request for Information in the above-styled matter.

Respectfully submitted,

DANIEL J. CAMERON
ATTORNEY GENERAL



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
Michael.West@ky.gov
Larry.Cook@ky.gov
John.Horne@ky.gov

/s/ M. Todd Osterloh
STURGILL, TURNER, BARKER & MOLONEY, PLLC
James W. Gardner
M. Todd Osterloh
333 W. Vine Street, Suite 1500
Lexington, Kentucky 40507
Telephone No.: (859) 255-8581
Facsimile No.: (859) 231-0851
jgardner@sturgillturner.com
tosterloh@sturgillturner.com

and

Susan Speckert, Commissioner of Law
David J. Barberie, Managing Attorney
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500
dbarberi@lexingtonky.gov
Attorneys for Lexington-Fayette Urban County
Government

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 Kentucky-American Water Company's Post-Hearing Request for Information

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 1
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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.

RESPONSE:

Please refer to Mr. Meyer's updated labor adjustment as provided in the excel spreadsheet filed contemporaneously with this response. Refer to the attached file for the calculation and all components.

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 Kentucky-American Water Company's Post-Hearing Request for Information

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 2
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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%.

RESPONSE:

Please refer to the excel spreadsheet filed contemporaneously with this response.