

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

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S
SECOND REQUEST FOR INFORMATION**

In accordance with the Public Service Commission's ("Commission") July 21, 2023 Order, Lexington-Fayette Urban County Government ("LFUCG") propounds the following data requests upon the Applicant Kentucky-American Water Company ("KAWC"). KAWC shall respond to these requests in accordance with the provisions of the Commission's Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate LFUCG's request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for LFUCG.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much

information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. 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.

7. If KAWC objects to any request on any grounds, please notify counsel for LFUCG as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: 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.

10. 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.

Respectfully submitted,



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Requests for Information

1. Please see Mr. Seliger's testimony, page 17 lines 9-17. Please provide all data and analysis, with formulas and links intact, for all sample Advanced Metering Infrastructure ("AMI") data relied upon by KAWC to develop the maximum daily consumption values for each customer class in KAWC's Cost of Service Study.
2. Please see Mr. Seliger's testimony, page 20 lines 16-21. Please provide all data and analysis, with formulas and links intact, for all sample Advanced Metering Infrastructure ("AMI") data relied upon by KAWC to develop the maximum hourly consumption values for each customer class in KAWC's Cost of Service Study.
3. Please refer KAWC's cost of service study "KAW_R_PSCDR1_NUM003_071823_Attachment.xlsx", tab "Usage Statistics", row 15, columns I and J showing the "Fire Allocator" for the Public and Private Fire classes. Please provide the supporting documentation and calculation that resulted allocation shown in these cells.
4. Please refer to Response to LFUCG DR 1-6. Regarding West Virginia, please provide the order referenced in the statement, "Public fire rates to municipalities are frozen by Commission order since before the year 2000 so any additional revenue requirements associated with public fire service will be recovered through base rates."
5. Please refer to LFUCG DR 1-6. Please provide all written agreements, contracts, ordinances and other documentation governing the relationship between KAWC and the City of Georgetown whereby KAWC includes a hydrant surcharge added to their bill for customers in Georgetown.
6. Please refer to LFUCG DR 1-8. Please provide written records submitted to Peaks Mill Water District in response to its request for proposal.
7. Please refer to LFUCG DR 1-62. Please identify the locations by city where the approximately 1,200 Service Company employees are stationed. Include within your response the total number of Service Company employees stationed at each location and the number of Service Company employees stationed at each location that provides services to KAWC.