KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Michi Chao and Robert Prendergast

1. Refer to the Application, Direct Testimony of Michi Chao (Chao Direct Testimony). Also refer to Kentucky-American's response to the Commission Staff's First Request for Information (Staff's First Request), Attachment, Item 1, KAW_R_PSCDR1_NUM001_Attachment_PUBLIC, KAWC 2025 Rate Case – Income Statement. Explain why the following expenses are being increased by approximately 6.88 percent instead of the 5.16 percent listed in the Chao Direct Testimony.

   a. Contracted Services

   b. Building Maintenance and Services

   c. Telecommunication Services

   d. Rents

   e. Customer Accounting, Other

Response:

The 5.16% listed in the Direct Testimony of Michi Chao represents KAWC's O&M Growth Factor calculated on an annual or 12-month basis. The 6.88% as referenced in the above listed exhibits represents the total growth in O&M expenses over the16-month period between the end of the base period (August 31, 2025) and the end of the forecast test year (December 31, 2026).

KAWC applied a pro-rated growth factor over the 16-month period, rather than the 12-month annualized rate, in order to more accurately reflect the increase in operating costs expected during the forecasted period, because the 12-month annualized rate would not capture the total anticipated cost increases between the base and test year periods. This pro-rated growth factor (6.88%) was applied to KAWC direct expense categories including Contracted Services, Building Maintenance and Services, Telecommunication Services, Rents, and Customer Accounting – Other.

Please see the table below, which further illustrates the calculation of the 6.88% growth factor.

KAW O&M Growth Factor	KAW O&M Growth Factor Period (Months)	Monthly KAW O&M Growth Factor	Base Year Year End Date	Forecast Year Year End Date	Growth Period (Months) to Forecast Year Year End Date	Pro-Rated KAW O&M Growth Factor
5.16%	12	0.43%	8/31/2025	12/31/2026	16	6.88%

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Witness: Robert Prendergast

2. Refer to Kentucky-American's response to Staff's First Request, Attachment, Item 1, KAW_R_PSCDR1_NUM001_Attachment_PUBLIC, 2025 KAWC Rate Case – KAW O&M Growth Factor Workpaper. Explain Kentucky-American's reasoning for using a single growth factor to forecast certain expense categories but not others.

Response:

The Company's use of a single growth factor to forecast certain expense categories, but not others, was driven by the Commission's May 3, 2024 decision in the Company's last rate case, Case No. 2023-00191. On pages 17-19 of that Order, the Commission ruled that inflation factors should be removed from the forecasted test year for the following expenses:

- Fuel & Power
- Support Services
- Contract Services
- Building Maintenance & Services
- Office Supplies & Services
- Employee Related Expense
- Miscellaneous Expense
- Rents
- Other Customer Accounting
- Maintenance Supplies & Services

The Commission further stated its reasoning, "The Commission has previously held a general CPI inflation factor is not an appropriate forecasting method and even the granular inflation factors are not specific to Kentucky-American's experience. Use of general inflation factors fails to satisfy Kentucky-American's burden that its proposed rates are just and reasonable, as they are not, in and of themselves, reflective of Kentucky-American's costs. The Commission expects a utility such as Kentucky-American, with the shared resources of American Water, to develop and implement more robust forecasting methodologies for expenses than general CPI inflation factors with a review of specific factors impacting costs."

While the use of "general CPI inflation" was disallowed in Case No. 2023-00191, the Company expects that its expense levels in these categories will increase from the base year to the forecasted year. In order to capture these expected expense increases, while also meeting the Commission's criteria of being "specific to Kentucky-American's experience" and "reflective of Kentucky American's costs", the Company completed the analysis shown in its response to Staff's First Request, Attachment, Item 1, KAW_R_PSCDR1_NUM001_Attachment_PUBLIC, 2025 KAWC Rate Case – KAW O&M Growth Factor Workpaper. This analysis calculates the 3-year average

compound annual growth rate for all of the expenses listed above, with the exception of Fuel & Power and the inclusion of Telecommunications expense.

KAWC limited its use of the O&M Growth Factor based on the Commission's Order in Case No. 2023-00191, and because the Commission has approved the Company's forecasting methodology for other expense categories that did not use CPI Inflation. It should be noted that Fuel & Power expense is not included in the O&M Growth factor. Please see KAWC's response to PSC DR 2-005 and 3-015 for an explanation of the Company's Fuel & Power expense growth factor.

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Witness: Robert Prendergast

3. Refer to Kentucky-American's response to Staff's First Request, Attachment, Item 1, KAW_R_PSCDR1_NUM001_Attachment_PUBLIC, 2025 KAWC Rate Case – KAW O&M Growth Factor Workpaper. Explain how Kentucky-American determined which Operating & Maintenance (O&M) expenses would comprise the O&M growth factor.

Response:

Please see the response to PSC 3-2. Further, the Company determined which O&M expenses would comprise the O&M growth factor in accordance with the Commission's May 3, 2024 Order in the Company's last rate case, Case No. 2023-00191. On pages 17-19 of that Order, the Commission ruled that inflation factors should be removed from the forecasted test year for the following expenses:

- Fuel & Power
- Support Services
- Contract Services
- Building Maintenance & Services
- Office Supplies & Services
- Employee Related Expense
- Miscellaneous Expense
- Rents
- Other Customer Accounting
- Maintenance Supplies & Services

The Company included the above expenses in its O&M growth factor calculation as well as Telecommunications expense and did not include Fuel & Power expense. Please see KAWC's response to PSC 3-15 for an explanation of its Fuel & Power expense growth factor.

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Witness: Robert Prendergast

4. Refer to Kentucky-American's response to Staff's First Request, Attachment, Item 1, KAW_R_PSCDR1_NUM001_Attachment_PUBLIC, 2025 KAWC Rate Case – KAW O&M Growth Factor Workpaper. Also refer to Application, Exhibit 37, Schedule D-2. Explain why Support Services is included in the calculation of the Kentucky-American growth factor when there is no adjustment made to account for the growth factor from the base period to the test period.

Response:

Support Services is included in the calculation of the Kentucky-American growth factor because an adjustment was made to account for growth from the base period to the test period. Specifically, a 12-month CAGR adjustment of $244,429 was applied, as shown on "Workpaper 1-Summary" tab of the KAWC 2025 Rate Case - Support Services Exhibit filed in response to Staff's First Request, Attachment, Item 1, KAW_R_PSCDR1_NUM001_Attachment_PUBLIC.
While this adjustment is not explicitly shown within the Application, Exhibit 37, Schedule D-2, it was incorporated within the calculation.

	Other Expense	Applicable Annual Inflation %
Base Yr Expense	$5,505,630	
Exclusions from Inflation Calculation:		
Remove Depreciation Expense	($653,957)	
Remove LOP Interest	($114,678)	
Adjusted Expense for Inflation Calculation	$4,736,995	
Test Year CAGR Adjustment (12 months)	$244,429	5.16%

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Witness: Dominic DeGrazia

5. Refer to Kentucky-American's response to Attorney General's First Request for Information (Attorney General's First Request), Item 22.

   a. Explain why Kentucky American's dues for the Downtown Lexington Partnership increased in 2025 as opposed to 2023 and 2024.

   b. Confirm whether Kentucky American has fulfilled its annual dues with Downtown Lexington Partnership. If not, explain when that will occur.

   c. Explain the $1,000 increase in Georgetown – Scott City Chamber of Commerce dues in 2024.

   d. Explain the $11,474 increase in Kentucky Environmental Project dues in 2024.

Response:

   a. Kentucky-American's dues for the Downtown Lexington Partnership did not increase in 2025 over 2024 or 2023. The payment made was $1,288 in 2025 as opposed to $1,250 in 2024 and 2023 because of a credit card processing fee. The increase is a result of a change in payment method, not an increase in the dues.

   b. Confirmed.

   c. The additional $1,000 increase to Georgetown – Scott City Chamber of Commerce dues in 2024 was due to an additional sponsorship payment made to the Chamber for the 2024 Annual Awards Reception. This payment, while made to the Chamber in support of hosting the reception, is not a 'due' and should have been coded to account 52514700 'Community Partnerships'.

   d. These dues are for water operators continuing education license renewals with the Kentucky Department for Environmental Protection.

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Witness: Deba Ather and William A. Lewis

6. Refer to the Direct Testimony of Debra Ather (Ather Direct Testimony), Exhibit DFA-1, Chart 1. Explain how Kentucky-American will continue to make water service affordable for its customers when the Average Monthly Bill is anticipated to increase approximately 27.13 percent from 2024 to the forecast year, while Median Household Income is only expected to increase approximately 9.86 percent for the same period.

Response:

As is more fully discussed in KAWC witness Lewis' Direct Testimony (beginning on page 23), improving water efficiency helps the Company continue to make water service affordable for the majority of KAWC customers. Water efficiency means using improved practices and technologies to deliver water service more efficiently. KAWC's efforts to improve water efficiency cover a wide range, and include supply-side practices, such as water loss reduction efforts, improved pump efficiencies, electrical cost management programs, chemical and waste disposal improvement projects, as well as demand-side strategies, such as customer and public education programs that provide incentives to improve water and energy efficiency. From an operations perspective, improving water efficiency requires achieving a cost-effective mix of prudent investments and improved operations and maintenance management capabilities targeting safety, customer satisfaction, sustainability, and system efficiency. The Company works to improve water efficiency by, among other things, investing in technology, improving water usage monitoring and leak detection.

The Company also evaluates affordability in the communities it serves. The affordability of water service is influenced by both the cost of the water service and household income, which is what the Company has used in its affordability analysis to study the long-term impacts of changes to its rates on affordability of water service to customers (please see the discussion on the Enterprise-Level analysis beginning on Ather Direct Testimony, p. 6), and the impact the Company's proposed rates in this case will have on affordability of water services for individual groups of customers (please see the Community-Level analysis beginning on Ather Direct Testimony, p. 11). While the Company has not studied how the timing or frequency of rate changes specifically impacts affordability, the Enterprise-Level analysis does provide a high-level historical perspective on how the affordability of service has been trending over time and how it is expected to continue to trend under proposed rates. The Company's Enterprise-Level analysis is attached to Ms. Ather's Direct Testimony as KAWC Exhibit DFA-1.

For those customers who are most financially challenged, any increase in rates would likely present affordability challenges, regardless of timing, assuming the household income and

size remained the same. However, as discussed in Ms. Ather's Direct Testimony, the Company's water service has been, is, and is expected to continue to be affordable for the vast majority of its residential customers, including under the rates proposed in this case and the affordability of the Company's water service indicates that the way the Company has invested in and managed its water systems has indeed been for the long-term benefit of our customers.

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Witness: Deba Ather

7. Refer to the Ather Direct Testimony, Exhibit DFA-1. Explain why and how Kentucky-American calculated its Median Household Income adjustment factor to forecast Median Household Income for Kentucky-American customers. Provide all calculations in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

Response:

The MHI adjustment factor is used to convert MHI statistics at the state level to MHI statistics for the Company's particular customer base which includes an assumption that the Company's customers are households that are owner-occupied households and renter-occupied households in single family homes. The MHI adjustment factor is calculated by dividing the MHI for KAWC customers by the statewide MHI.

Please see cell W10 in KAW_R_PSCDR3_NUM007_080425_Attachment for the calculation of the Median Household Income adjustment factor.

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Witness: Deba Ather

8. Refer to Kentucky-American's response to Attorney General's First Request, Item 27(e). For the following counties, provide the number of Kentucky-American customers by customer class and total households. If these totals are different, please explain the difference and how those differences are determined.

   a. Bourbon County

   b. Clark County

   c. Fayette County

   d. Harrison County

   e. Jessamine County

   f. Nicholas County

   g. Scott County

   h. Woodford County

   i. Gallatin County

   j. Owen County

   k. Grant County

   l. Franklin County

   m. Rockcastle County

   n. Jackson County

Response:

The Company has provided an extensive analysis of the affordability of water service in this case which includes estimating the number of residential customers whose household incomes fall within different percentages of Federal Poverty Level by zip code, rather than

by county. For the purposes of this request, customers in Corinth have been grouped in Grant County and customers in Sparta have been grouped in Gallatin County. The number of households served makes up the residential customer class.

a. Bourbon County: 1475

b. Clark County: 1405

c. Fayette County: 111,171

d. Harrison County: 97

e. Jessamine County: 0

f. Nicholas County: 50

g. Scott County: 7212

h. Woodford County: 209

i. Gallatin County: 583

j. Owen County: 2887

k. Grant County: 511

l. Franklin County: 0

m. Rockcastle County: 571

n. Jackson County: 52

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Witness: Robert Prendergast

9. Refer to Kentucky-American's response to Attorney General's First Request, Item 40(b). Provide all calculations Kentucky-American used in determining the amounts for the Annual Performance Plan and Long-Term Performance Plan in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

Response:

Please see KAW_R_PSCDR3_NUM009_080425_Attachment.

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Witness: Dominic DeGrazia

10. Refer to Kentucky-American's response to Attorney General's First Request, Item 53. Itemize the expenses associated with "Other" Board of Director Fees and Meeting Costs.

Response:

The amounts included as "Other" for 2023 and 2024 Board of Director Fees shown in the Company's response to Attorney General's First Request, Item 53 are additional travel and meals; primarily travel. The Company should have included those amounts in with the travel and meals in its response to Attorney General's First Request, Item 53.

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Witness: Robert Prendergast

11. Refer to Kentucky-American's response to Attorney General's First Request, Item 98. Explain why the forecast for the Employee Awards expense is being increased when Kentucky-American expects the number of retirement gifts to decrease. Further, state the number of employees Kentucky-American is forecasting to receive service awards in both the Base Period and the Test Period.

Response:

Although the number of retirement gifts is anticipated to decrease as the number of pension-eligible retirees decreases, that does not necessitate a decrease in Employee Awards expense for the base or forecast years. While the Company cannot predict the retirements that will take place in the base and forecast test years, the Company anticipates 22 employees will receive service awards during the base year and 23 employees will receive a service award during the forecast year. Additionally, the Company anticipates that the cost of both service awards and retirement gifts will increase over time.

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Witness: William A. Lewis

12. Refer to Kentucky-American's response to Lexington-Fayette Urban County Government's (LFUCG) First Request for Information (LFUCG's First Request), Item 26. Explain why hydrant billing is not paused or stopped while repairs or replacements are completed for a fire hydrant that is leaking, failed, or obsolete.

Response:

Only fire hydrants that meet the current minimum Commission standards for flow and flow duration are billed the fire hydrant fee in accordance with KAWC's existing tariff. Hydrants not meeting minimum standards are either owned by KAWC and maintained for flushing and other distribution system maintenance activities or are removed from the system. KAWC is unaware of any existing obsolete fire hydrants located in the fire hydrant inventory and is unaware of any obsolete fire hydrants with active billing.

KAWC is obligated to provide public fire hydrants at locations requested by authorized municipal authorities at the Company's expense. Additionally, water used by public authorities for extinguishing fires is provided at no cost to the municipality. Therefore, public fire service capacity and access to the system via fire hydrants are provided to the municipality at no direct cost and this service is not associated with the annual fire hydrant fee. The annual fire hydrant fee billed to municipalities recovers KAWC's cost to inspect, flush, test, and maintain annually as well as to rebuild and repair fire hydrants when and as needed to ensure fire hydrants are in working condition and meet minimum Commission requirements. Annual inspection, flushing, testing, and maintenance are performed for each hydrant, and it is through this process that deficiencies are identified so that needed repairs can be scheduled.

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Witness: Dominic DeGrazia

13. Refer to Kentucky-American's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 23. Provide the impact to the overall revenue requirement if Kentucky-American were to amortize the rate case expense over a three-year period instead of the two-year period requested in this case.

Response:

The revenue requirement would be reduced by $206,493.

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Witness: John Magner

14. Refer to Kentucky-American's response to LFUCG's First Request, Item 52.

    a. Explain why the unit cost of repairing and replacing water mains increased approximately 31 percent in 2024 when less linear feet of water main was replaced compared to 2023.[2] Provide all calculations in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

    b. Of the linear feet of water main replaced, as the result of leaks or breaks, in 2023 and 2024, identify how many feet, by year, were included to be replaced in the Qualified Infrastructure Improvement Plan (QIP) for a subsequent year. In addition, include how many linear feet had been replaced as part of the QIP since its approval.

Response:

    a. The increase in unit costs is primarily the result of increased restoration costs associated with unscheduled main replacements. As shown in the calculations presented in KAW_R_PSCDR3_NUM014_080425_Attachment 1, Kentucky American Water ("KAWC") incurred $525,201.52 in costs associated with paving and backfill in 2023, compared to $1,081,129.65 in 2024. Restoration limits for disturbed pavement are determined at the sole discretion of the local authority having jurisdiction. Increased restoration limits required by the local authority results in increased restoration costs for KAWC. If the paving/backfill costs are removed from the total costs, the unit cost of unscheduled main replacements in 2024 is less than the unit cost for 2023.

    b. Eighty-six linear feet of the water main replaced as the result of leaks or breaks in 2023 or 2024 has been included for replacement as part of QIP in subsequent years.

    The total linear feet of water main replaced as part of the QIP since the program's approval, approximately 231,000 linear feet of water main has been replaced in QIP Years 1-5.

[2] From 2023 to 2024, there appears to be an approximate 31 percent increase in unit cost, based on the 2023 unit cost of $1,620, and 2024 unit cost of $2,124.

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Witness: Robert Prendergast

15. Refer to Kentucky-American's response to Staff's First Request, Item 1, KAWC 2025 Rate Case – Fuel and Power Exhibit.xlsx. Explain how Kentucky-American intends to address any discrepancies between the actual and forecasted 6.5 percent growth factor.

Response:

KAWC has not proposed a production cost tracking mechanism in this case, and as such, any discrepancy between the Fuel and Power expense adopted by the Commission and the actual expense incurred will not be reconciled. This is the same treatment as the other O&M expenses in this case.

Please also see KAWC's response to AG 2-55. Upon further review of its Fuel and Power expense in discovery, KAWC identified that the 6.5% escalation was applied to both the base period and the forecasted test year. This compounding effect is a misapplication to KAWC's Fuel and Power Expense. The cumulative impact of this correction will be a downward adjustment of approximately $318,000 to the Fuel and Power Expense in the forecasted test year. KAWC's revised Fuel and Power expense in the forecasted test year will be adjusted to $5,721,873. KAWC will reflect this revised Fuel and Power Expense in its update to the revenue requirement.

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Witness: Ann Bulkley

16. Refer to Kentucky-American's response to Staff's Second Request, Item 10(b).

    a. Provide the date of the Value Line information used in the analyses.

    b. Provide each of the Value Line Investment Survey company profile sheets, from that date, supporting the return on equity analyses in PDF format.

Response:

a. The dates of the Value Line reports relied upon are January 3, 2025, and February 21, 2025.
b. Please see Attachment 13 provided in response to KAW_R_PSCDR2_NUM010_070725.

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Witness: John Magner

17. Refer to Kentucky-American's response to Attorney General's First Request, Item 59.

    a. Provide descriptions of all infrastructure relocations required to support the work of other public entities and utilities and explain why these relocations are occurring now rather than in the future.

    b. Describe in detail and provide examples of the increases in material and labor costs for capital construction projects that are driving higher capital expenditures.

Response:

a. Capital infrastructure relocation projects required to support the work of other public entities and utilities that have been placed into service or are anticipated to be placed into service between February 1, 2025 and December 31, 2025 are described below. This list includes only relocation projects known to Kentucky American Water ("KAWC") at this time and is not exhaustive of all infrastructure relocation work that will be performed during the stated time period, as other entities may require relocations for which KAWC has not yet been engaged.

The schedules of these infrastructure relocation projects are largely out of the control of KAWC. The other public entities and utilities must complete tasks such as preparing engineering designs, acquiring property, obtaining permits, and executing agreements prior to KAWC beginning the construction of relocation projects. However, KAWC must also complete the relocations in a time frame that prevents the identified utility conflicts from impacting the projects of the other public entities and utilities. The infrastructure relocation projects described below have occurred or are anticipated to soon occur because the schedule aligns with the considerations above. These relocations cannot simply be completed at a future date because the other public entities and utilities need KAWC's infrastructure moved prior to it impacting their projects.

- New Circle Rd Trunk Sewer A/B Main Relocations: Relocate several hundred feet of water main that conflicts with a proposed LFUCG sewer trunk line.
- Richmond Road RCUT Main Relocations: Relocate approximately 1,900 LF of 30" water main for a KYTC roadway project. Includes several large valve installations and temporary bypassing of the affected main.
- Newtown Pike Main Relocations: Relocate approximately 1,900 LF of primarily 12" and 16" water main for a KYTC roadway project along Newtown Pike in Lexington.

- Cooper Drive Main Relocations: Relocate approximately 390 LF of 6" water main to facilitate an LFUCG storm sewer improvement project.
- Wilson Downing Road Relocations: Relocate 8" water main to facilities at LFUCG construction project.
- Military Pike Main Relocations: Relocate approximately 1,200 LF of 12" water main for a KYTC roadway project along Military Pike.
- Mason Headley Relocations: Relocate approximately 350 LF of 8" water main to facilitate an LFUCG roadway project.
- Liberty Road Main Relocations: Relocate approximately 4,400 LF of 12" water main to facilitate a KYTC roadway project along Liberty Road in Lexington.
- US 460 Relocations: Relocate approximately 12,000 LF of 12" water main to facilitate a KYTC roadway project along US 460 in Scott County.
- Joyland Area Stormwater Main Relocations: Relocate approximately 740 LF of 6" and 8" water main to facilitate an LFUCG storm sewer project.
- Savannah Lane Stormwater Main Relocations: Relocate approximately 110 LF of 6" and 8" water main to facilitate an LFUCG storm sewer project.
- New Circle Road Widening Main Relocations: Relocate approximately 6,000 LF of 6" to 24" water main to facilitate a KYTC roadway project. This project includes mains installed via trenchless methods.
- Old Frankfort Pike Main Relocations: Relocate approximately 500 LF of 12" and 24" water main to facilitate the construction of an LFUCG multi-use path.

b. Similar to many utilities and companies across the country, particularly in the post-COVID economy, KAWC has experienced overall price increases associated with materials and contract labor. These increases are most evident when evaluating pricing for water main replacement completed as part of KAWC's QIP program, as KAWC performs similar work as part of this program each year, making it possible to evaluate changes in pricing for similar work over time.
    a. Over the past several years, KAWC has experienced significant increases in pricing for ductile iron pipe, which is the primary pipe material installed for QIP main replacements. During QIP Year 2, KAWC paid approximately $21 per linear foot for 8" ductile iron pipe, which is the most common pipe installed as part of the QIP program. Currently, KAWC pays approximately $31 per foot for this pipe, representing an approximately 48% increase in pipe material pricing.
    b. During QIP Year 3, KAWC paid approximately $190 per linear foot for contract labor to perform main installation/replacement (not including hard surface restoration). Based on bid pricing received through June 22, 2025 for QIP Year 6 (2025) projects, KAWC is currently paying approximately $345 per linear foot of main installation/replacement for QIP Year 6. This represents an approximately 82% increase in contract labor costs for main installation/replacement.

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Witness: John Magner

18. Refer to Kentucky-American's response to Staff's First Request, Item 14, Schedule 14b.

    a. Provide a detailed explanation of the main causes of capital construction budget overruns from 2015 through 2024, including the most common drivers of variance between budgeted and actual costs.

    b. Provide a detailed description of the steps that Kentucky-American has undertaken to reduce budget overruns from 2015 through 2024.

Response:

a. Descriptions for capital construction budget overruns for each of the years requested are provided below. Variance values are rounded to the nearest hundred thousand dollars.

- 2015: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with main replacements ($2.2M); hydrant, valve, and manhole replacements ($1.2M); water main relocations to facilitate a roadway project along New Circle Road in Lexington ($1.4M); and centrally sponsored technology/enterprise solutions projects ($1.7M).
- 2016: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with the replacement of the filter building at Kentucky American Water's ("KAWC") Richmond Road Station water treatment plant ($3.5M), the construction of two significant main extensions ($2.1M), and intake pump replacements at KAWC's Kentucky River Station No. 2 water treatment plant ($0.8M)
- 2017: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with meter replacements ($1.1M), the construction of a large main extension ($1.1M), and the improvement of sedimentation basins at KAWC's Richmond Road Station water treatment plant ($1.2M).
- 2018: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with meter replacements ($3.0M) and centrally sponsored technology/enterprise solutions projects $1.0M).
- 2019: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with meter replacements

($1.3M), improvements to residual management facilities at the Kentucky River Station No. 1 water treatment plant ($1.5M), the construction of new chemical buildings at the Kentucky River Station No. 1 and Richmond Road Station water treatment plants ($5.4M), rehabilitation of valve houses for the Aldrich Units at the Kentucky River Station No. 1 water treatment plant ($1.2M), the construction of a significant main extension ($1.7M), the construction of a new pumping station ($1.4M), and the construction of a new operations building ($1.3M).

- 2020: The largest driver for actual capital expenditures exceeding budgeted capital expenditures was additional spend associated with the construction of new chemical buildings at the Kentucky River Station No. 1 and Richmond Road Station water treatment plants ($2.9M)
- 2021: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with main replacements ($4.1M), the installation of new services ($1.2M), and meter replacements ($1.2M).
- 2022: The largest driver for actual capital expenditures exceeding budgeted capital expenditures was additional spend associated with main replacements ($6.3M).
- 2023: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with main replacements ($8.3M) and meter replacements ($3.2M).
- 2024: The largest drivers for actual capital expenditures exceeding budgeted capital expenditures were additional spend associated with main relocations ($4.4M), vehicle purchases/replacements ($1.2M), and the construction of new gravity thickener tanks at the Kentucky River Station No. 1 water treatment plant ($1.9M).

b. KAWC utilizes many measures to mitigate project cost variances such as competitive bidding, leveraging Service Company's supply chain team for material procurement, strategic project scoping, restoration cost sharing, value engineering, internal design development, and planned and proactive main replacements. These measures are described in detail on pages 11-14 of the direct testimony of John Magner.

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Witness: Robert Prendergast

19. Refer to Kentucky-American's response to Staff's Second Request, Item 9. Provide an adjustment to the revenue requirement pursuant to 807 KAR 5:066, Section 6(3), for expenses associated with water loss over 15 percent for the test period. Provide all calculations in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

Response:

Please see KAW_R_PSCDR3_NUM019_080425_Attachment.xlsx.

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COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Michi Chao

20. Refer to Kentucky-American's response to Staff's Second Request, Item 3(a). Explain what "normalized" means in the response. Include in the response a specific description of how the value was calculated.

Response:

In compiling the response to this data request and performing further analysis on the Credit line fees forecast, Kentucky-American realized that the normalized adjustment of $8,333 was made in error and will remove this amount from the KAWC 2025 Rate Case - Office Supplies Exhibit. With this adjustment, the Office supplies forecast for the Future Test Year 2026 will be $324,583.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Robert Prendergast

21. Refer to Kentucky-American's response to Staff's Second Request, Item 4. Confirm that "relocation" was meant to be "reallocation". If not confirmed, provide a response to request Item 4 as set forth in Staff's Second Request, Item 4.

Response:

Not confirmed. Please refer to Kentucky-American's Response to Staff's First Request, Item 1, KAWC 2025 Rate Case – Employee Related Expense.xlsx., specifically the "Workpaper" tab. The account listed on Line 9, which contains the $25,855 adjustment referenced in Staff's Second Request, Item 4, is titled "Relocation Expenses", not "Reallocation expenses". So, the response provided to Staff's Second Request, Item 4 is correct as filed.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Robert Prendergast

22. Refer to Kentucky-American's response to Staff's Second Request, Item 4. Provide the historic yearly actuals for "reallocation" expense for the years 2019, 2020, 2021, 2022, 2023, 2024, and year to date. In addition, provide a description of what is contained in this expense category.

Response:

Kentucky American Water's response to Staff's Second Request, Item 4 duly refers to relocation expense, not reallocation expense as mentioned in this question.
Relocation expense refers to Kentucky-American Water paying for expenses incurred by certain employees to relocate upon being hired. The expenses for the time period in question can be found below. Please note that the higher expenses incurred in 2022 represent executive-level employees' relocation costs. A portion of these costs were accrued in December 2022, but came in less than the accrual in 2023, resulting in the negative value for that year.

Year	Relocation Expense
2019	33,333
2020	23,588
2021	30,994
2022	218,887
2023	(14,922)
2024	0
2025	10,499

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Robert Prendergast

23. Refer to Kentucky-American's response to Staff's Second Request, Item 5. Provide the total bill amount due for electric service, by month, for the period from March 2023 through June 2025.

Response:

Month	KAWC Power Invoice Totals (Water Only)
Mar 2023	$ 664,963
Apr 2023	$ 410,194
May 2023	$ 462,736
Jun 2023	$ 165,591
Jul 2023	$ 682,840
Aug 2023	$ 445,582
Sep 2023	$ 426,234
Oct 2023	$ 476,166
Nov 2023	$ 417,917
Dec 2023	$ 393,575
Jan 2024	$ 459,606
Feb 2024	$ 141,147
Mar 2024	$ 712,449
Apr 2024	$ 443,115
May 2024	$ 453,842
Jun 2024	$ 110,759
Jul 2024	$ 819,838
Aug 2024	$ 461,771
Sep 2024	$ 435,505
Oct 2024	$ 436,097
Nov 2024	$ 133,919
Dec 2024	$ 426,473
Jan 2025	$ 721,693
Feb 2025	$ 182,373
Mar 2025	$ 392,337
Apr 2025	$ 627,253
May 2025	$ 418,925
Jun 2025	$ 141,724

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Michi Chao

24. Refer to Kentucky-American's response to Staff's Second Request, Item 8. Provide the actual rent expense by category by month for the period March 2023 through June 2025.

Response:

Please refer to attachment KAW_R_PSCDR3_NUM024_080425_Attachment.

PSCDR3_NUM024_080425
Actual Rent Expense 03.2023-06.2025

Account No.	Account Name	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
54110000	Rents-Real Property - Natural Account	0	0	0	0	(0)	0	0	0	0	(0)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
54110011	Rents-Real Property - Source of Supply	13	3787	(871)	113	3596	168	119			3459	126	2490	5128	(222)	2520	617	66	732	276	218	9092	2413	2334	221	4749	2440	2474	2702
54110013	Rents-Real Property - Water Treatment			281													1500	2000	1000	1103	1103	1103	1103	1103	1103	1103	1103	103	1103
54110014	Rents-Real Property - Transmission & Distribution	609	5290		627	100	1351	1347	641	640		300	925	3795	3163	582		1937	100	1287	1545	659		300	1356	3897	2861	1958	
54110016	Rents-Real Property - Admin & General	329	2495	595										3600												2700			
54140000	Rents-Equipment - Natural Account	0	0	0	0	0	0	0	(0)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
54140011	Rents-Equipment - Source of Supply	0																											
54140013	Rents-Equipment - Water Treatment							4344											1451	(1451)	107								
54140014	Rents-Equipment - Transmission & Distribution			5232	2616				144																				
54140016	Rents-Equipment - Admin & General	834	100	100	464	154	100	100	100	100	1924	100	100	442	7466	965	(134)	100	965	(945)	(642)		384	100	100	1703		(251)	4601
Total		$1,785	$11,672	$5,337	$3,820	$3,850	$1,619	$5,911	$885	$740	$5,383	$526	$3,515	$12,966	$10,406	$4,066	$1,983	$4,103	$4,247	$271	$2,331	$10,854	$3,900	$3,837	$2,780	$14,152	$6,404	$4,284	$8,407

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Max McClellan

25. Refer to Kentucky-American's response to LFUCG's First Request, Item 1. For each meter provided in the response, for the last 24 months beginning June 2023, identify by month whether the meter for the hydrant was read or estimated.

Response:

Please refer to "KAW_R_PSCDR3_NUM025_080425_Attachment" for information on whether each meter provided in the cited response was read or estimated for the 24 months beginning June 2023.

Kentucky American Water Company
Case No. 2025-00122
LFUCG Water Service Meters - Monthly Actual Reads vs Estimated

Contract Account	Account Class	Price Class	Contract Number	# of Meters	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25
210007095646	OPA	1" Meter Charge	3100527138	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007167794	OPA	2" Meter Charge	3100637413	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007256229	OPA	5/8" Meter Charge	3100570471	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007262217	OPA	5/8" Meter Charge	3100682697	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007275060	OPA	2" Meter Charge	3100669298	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007277059	OPA	5/8" Meter Charge	3100669442	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007322294	OPA	1" Meter Charge	3100715311	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007340704	OPA	5/8" Meter Charge	3100632807	1		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read	Read	Read
210007366386	OPA	2" Meter Charge	3100571613	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007367792	OPA	2" Meter Charge	3100662611	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007367792	OPA	6" Meter Charge	3100662611	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007385974	OPA	1" Meter Charge	3100691606	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007431679	OPA	2" Meter Charge	3100662971	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Read	Read
210007431679	OPA	4" Meter Charge	3100662971	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Read	Read
210007436841	OPA	5/8" Meter Charge	3100592446	1	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read		Read	Read	Read	Read	Read		Read	Read	Read	Read	
210007437264	OPA	4" Meter Charge	3100592480	1	Read	Read	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read
210007439215	OPA	2" Meter Charge	3100600612	2	Read	Estimated	Read	Read	Read		Read	Read	Read	Read	Read	Read		Read	Estimated	Estimated	Read	Read		Read	Read	Read	Read	Read
210007490562	OPA	1" Meter Charge	3100600708	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007491251	OPA	2" Meter Charge	3100600761	1	Estimated	Estimated	Estimated	Read	Read	Estimated	Estimated	Read	Estimated	Read	Read	Estimated	Estimated	Read	Estimated	Read	Read	Read	Read	Read	Estimated	Read		Estimated
210007501554	OPA	1" Meter Charge	3100670379	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007505396	OPA	1" Meter Charge	3100562759	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007505624	OPA	5/8" Meter Charge	3100562786	1	Read	Read	Read	Read	Estimated	Estimated		Read	Read	Read	Read	Read		Read		Read	Read	Read		Read	Read	Read	Read	Read
210007505693	OPA	5/8" Meter Charge	3100562794	1	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read		Read		Read	Read	Read		Read	Read	Read	Read	Read
210007505785	OPA	5/8" Meter Charge	3100562802	1	Read	Read	Read	Read	Read	Read		Read	Estimated	Read	Read	Read		Read		Read	Read	Read		Read	Read	Read	Read	Read
210007508036	OPA	1" Meter Charge	3100558092	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007513915	OPA	1" Meter Charge	3100602351	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007557038	OPA	2" Meter Charge	3100608656	2	Estimated	Read	Estimated	Estimated	Estimated	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read
210007567851	OPA	5/8" Meter Charge	3100565056	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007615590	OPA	5/8" Meter Charge	3100640108	1	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read		Read		Read	Read	Read		Read	Read	Read	Read	Read
210007627975	OPA	2" Meter Charge	3100571165	1	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read		Read		Read	Read	Read		Read	Read	Read	Read	
210007640978	OPA	2" Meter Charge	3100667909	1	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007641056	OPA	2" Meter Charge	3100667917	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007667997	OPA	4" Meter Charge	3100618263	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007694876	OPA	2" Meter Charge	3100575768	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007701309	OPA	2" Meter Charge	3100596443	1	Estimated	Estimated	Estimated	Estimated	Read	Read	Read	Read		Read	Read		Read	Read		Estimated	Read	Read	Read	Read	Read	Read	Read	Read
210007701309	OPA	6" Meter Charge	3100596443	1	Estimated	Estimated	Estimated	Estimated	Read	Read	Read	Read		Read	Read		Read	Read		Estimated	Read	Read	Read	Read	Read	Read	Read	Read
210007726292	OPA	5/8" Meter Charge	3100726101	1	Read	Estimated	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007726377	OPA	1" Meter Charge	3100726106	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated
210007734033	OPA	1" Meter Charge	3100623215	1	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read		Read		Estimated	Estimated	Read		Read	Read	Read	Read	Read
210007753089	OPA	1" Meter Charge	3100585732	1	Read	Read	Read	Read	Read		Read	Read	Read	Read		Read		Read		Read	Read	Read		Read	Read	Read	Read	Read
210007792572	OPA	1" Meter Charge	3100634552	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007824950	OPA	5/8" Meter Charge	3100666821	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007829979	OPA	2" Meter Charge	3100687541	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Estimated	Read	Read	Read	Read	Read	Read	Read	Read
210007853576	OPA	1" Meter Charge	3100643512	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007853668	OPA	5/8" Meter Charge	3100643519	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007922229	OPA	2" Meter Charge	3100687714	1	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read
210007922311	OPA	2" Meter Charge	3100687723	1	Read	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007948269	OPA	2" Meter Charge	3100674412	1	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Estimated	Estimated
210007973456	OPA	5/8" Meter Charge	3100749203	1	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210007973630	OPA	1" Meter Charge	3100749220	1	Read	Estimated	Read	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008015025	OPA	1" Meter Charge	3100687927	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008075362	OPA	5/8" Meter Charge	3100665076	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008090637	OPA	5/8" Meter Charge	3100663535	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008120415	OPA	5/8" Meter Charge	3100739444	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008143647	OPA	1" Meter Charge	3100653536	1	Read	Estimated	Read		Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008162662	OPA	1" Meter Charge	3100660071	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008180639	OPA	5/8" Meter Charge	3100621315	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008188817	OPA	5/8" Meter Charge	3100738306	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008210233	OPA	1" Meter Charge	3100577600	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008210660	OPA	1" Meter Charge	3100563582	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008211328	OPA	1" Meter Charge	3100563626	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008284616	OPA	2" Meter Charge	3100674023	1	Read	Read	Read	Read	Read		Read	Read		Read	Read		Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read
210008297629	OPA	1" Meter Charge	3104950525	1						Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008372186	OPA	1" Meter Charge	3100669358	1	Read	Estimated	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008375062	OPA	1" Meter Charge	3100629945	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008387652	OPA	5/8" Meter Charge	3100633607	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008422111	OPA	2" Meter Charge	3100671603	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read

210008445626	OPA	2" Meter Charge	3100679649	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008448281	OPA	5/8" Meter Charge	3100664245	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008448465	OPA	1" Meter Charge	3100664262	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008468353	OPA	1" Meter Charge	3100697600	1	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008485365	OPA	5/8" Meter Charge	3104966964	1						Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008506491	OPA	2" Meter Charge	3100719135	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008545663	OPA	1" Meter Charge	3100707399	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008553046	OPA	1" Meter Charge	3100559596	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008583337	OPA	5/8" Meter Charge	3100693585	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008584521	OPA	1" Meter Charge	3100682796	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read	Read	Read
210008592591	OPA	1.5" Meter Charge	3100705278	1	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008604982	OPA	1" Meter Charge	3100728810	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
210008659371	OPA	5/8" Meter Charge	3100669084	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Estimated	Read	Read	Read	Read	Read	Estimated	Read	Read	Read
210008659463	OPA	2" Meter Charge	3100669089	1	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
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220021638688	OPA	1" Meter Charge	3202474616	1	Read	Estimated	Read	Estimated	Read	Read	Read	Estimated	Read	Read	Read	Estimated	Read	Read	Estimated	Read	Read	Read	Read	Estimated	Read	Read	Estimated
220021638947	OPA	1" Meter Charge	3202459930	1	Read	Estimated	Read	Estimated	Estimated	Estimated	Estimated	Read	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read	Estimated	Read	Read	Read	Read
220021639018	OPA	5/8" Meter Charge	3202459937	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021639209	OPA	1" Meter Charge	3202459958	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021661138	OPA	2" Meter Charge	3202463137	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021661251	OPA	5/8" Meter Charge	3202463153	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021661329	OPA	5/8" Meter Charge	3202463163	1	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read		Read		Read	Read	Read		Read	Read	Read	Read
220021663028	OPA	1" Meter Charge	3202463347	1	Read	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021663035	OPA	5/8" Meter Charge	3202463348	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021663042	OPA	1" Meter Charge	3202463349	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read	Read	Read
220021663059	OPA	1" Meter Charge	3202463352	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021663066	OPA	5/8" Meter Charge	3202463353	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021663073	OPA	1" Meter Charge	3202463354	1	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021663103	OPA	1" Meter Charge	3202463357	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021663127	OPA	1" Meter Charge	3202463359	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021663158	OPA	1" Meter Charge	3202463361	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021695216	OPA	1" Meter Charge	3202466076	1	Read	Read	Read	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Estimated	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021695292	OPA	1.5" Meter Charge	3202466087	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220021695322	OPA	2" Meter Charge	3202466090	1	Read		Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220022181895	OPA	5/8" Meter Charge	3202518821	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220022667573	OPA	1" Meter Charge	3202575963	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read

220023654396	OPA	2" Meter Charge	3204009841	2	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220024540742	OPA	2" Meter Charge	3202796365	1	Read		Read		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Read
220024540780	OPA	6" Meter Charge	3202796368	1	Read		Read		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Read
220024540865	OPA	5/8" Meter Charge	3202796377	1	Read		Read		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Read
220024540889	OPA	5/8" Meter Charge	3202796379	1	Read		Read		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Estimated
220024540995	OPA	2" Meter Charge	3202796393	1	Read		Estimated		Read		Read	Read	Estimated	Read	Read	Read	Read	Estimated	Read	Read	Estimated	Estimated	Estimated	Estimated		Estimated		Read		Read
220024541066	OPA	1" Meter Charge	3202796399	1	Read		Estimated		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Read
220024541080	OPA	2" Meter Charge	3202796401	1	Read		Read		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Read
220024541110	OPA	2" Meter Charge	3202796402	1	Read		Estimated		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Estimated		Read		Read		Read
220024541141	OPA	2" Meter Charge	3202796407	1	Read		Read		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Read
220024541967	OPA	1" Meter Charge	3202796498	1	Read		Read		Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read		Read		Read
220025309081	OPA	2" Meter Charge	3202893755	1	Read	Estimated	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220026345646	OPA	1" Meter Charge	3203006432	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220026345653	OPA	1" Meter Charge	3203006435	1	Read	Read	Read		Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220026498335	OPA	2" Meter Charge	3203032541	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220027463011	OPA	5/8" Meter Charge	3203142195	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220029328664	OPA	1" Meter Charge	3203371550	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220029684524	OPA	2" Meter Charge	3203417638	1	Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220029864481	OPA	2" Meter Charge	3203435374	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220029988981	OPA	2" Meter Charge	3203448987	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	
220030562402	OPA	2" Meter Charge	3203740200	1	Estimated	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220031474959	OPA	2" Meter Charge	3203635570	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220032821992	Commercial	2" Meter Charge	3203784359	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220037442585	OPA	4" Meter Charge	3104689334	1	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read	Estimated	Read	Read	Read	Read	Read	Read		Estimated	Estimated	Estimated		
220038406711	OPA	1" Meter Charge	3104228992	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220038406728	OPA	1" Meter Charge	3104229016	1	Read	Read	Read	Read	Read	Read			Read	Read	Read	Read	Read		Read		Read	Read	Read			Read	Read	Read	Read	Read
220038406735	OPA	1" Meter Charge	3204448217	1	Read	Read	Read	Read	Read	Read			Read	Read	Read	Read	Read		Read		Read	Read	Read			Read	Read	Read	Read	Read
220038406742	OPA	1" Meter Charge	3104229023	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220038406759	OPA	1" Meter Charge	3104229027	1	Read	Read	Read	Read	Read	Read			Read	Read	Read	Read	Read		Read		Read	Read	Read			Read	Read	Read	Read	Read
220038464403	OPA	1" Meter Charge	3204462199	1	Read	Read	Read	Read	Read	Read			Read	Read	Read	Read	Read		Read		Read	Read	Read			Read	Read	Read	Read	Read
220038999008	OPA	1" Meter Charge	3204533073	1	Read	Read	Read	Read	Read	Read			Read	Read	Read	Read	Read		Read		Read	Read	Read			Read	Read	Read	Read	Read
220040040633	OPA	2" Meter Charge	3204662595	1	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read	Read
220040262907	OPA	1" Meter Charge	3204729693	1											Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read
220040606873	OPA	5/8" Meter Charge	3204734302	1											Read	Read	Read	Read	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read
220040701174	OPA	5/8" Meter Charge	3204745710	1												Read	Read	Estimated	Read	Read	Read	Read	Read	Read		Read	Read	Read	Read	Read
220041105601	OPA	1" Meter Charge	3204804070	1																				Estimated	Estimated	Estimated	Estimated	Read	Estimated	
220041105625	OPA	1" Meter Charge	3204804072	1																				Estimated	Estimated	Read	Read	Read		
220041141317	OPA	5/8" Meter Charge	3204817022	1																					Estimated	Estimated	Read	Read	Read	
220041392429	OPA	1.5" Meter Charge	3204833338	1																								Read		Read
210007367822	OPA	6" Meter Charge	3204836240	1																								Read	Read	
210007367822	OPA	2" Meter Charge	3204836240	1																								Read	Read	

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Max McClellan

26. Refer to Kentucky-American's response to LFUCG's First Request, Item 47. Explain, in detail, the circumstances that changed for the cost of service study to allocate the cost of service differently as it relates to the Public Fire class.

Response:

In KAW's last rate case (Case No. 2023-00191), the Public Fire cost of service was partially reallocated to the general service classes. In the cost-of-service study presented in the current case, the Public Fire class cost of service is not reallocated to other classes. This is largely due to taking into consideration the Commission's comments on pages 41-43 of the May 3, 2024 Order in Case No. 2023-00191 regarding Public Fire cost of service.

For the basis of the 14,000 gpm of fire flow utilized in the cost-of-service study presented in this rate case, please see the Company's response to LFUCG 1-35.

For the basis for utilizing a 10-hour demand for fire flow in the cost-of-service study presented in this rate case, please see the Company's response to LFUCG 1-36.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Max McClellan and William A. Lewis

27. Refer to Kentucky-American's response to LFUCG's First Request, Item 48.

    a. Provide the number of hidden leak adjustments requested, by month, for the period from June 2023 through June 2025.

    b. Of the requested adjustments referenced in Kentucky American's response to Staff First Request, Item 31(a), provide the number of actual adjustments made by Kentucky-American by month. Include in the response, the amount of each adjustment.

Response:

a. Please see the number of leak adjustment applications processed, by month, for the period from June 2023 through June 2025.

Month	Leak Adjustment Applications Processed
Jun-23	48
Jul-23	41
Aug-23	74
Sep-23	45
Oct-23	63
Nov-23	49
Dec-23	67
Jan-24	86
Feb-24	98
Mar-24	85
Apr-24	73
May-24	59
Jun-24	41
Jul-24	70
Aug-24	68
Sep-24	65
Oct-24	84
Nov-24	49

Dec-24	78
Jan-25	93
Feb-25	107
Mar-25	139
Apr-25	78
May-25	66
Jun-25	88

b. Please see the Company's response to PSCDR3-NUM041 which includes the number of leak adjustments by month for the period from June 2023 through June 2025, including the dollar amount of adjustments.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: William A. Lewis

28. Refer to Kentucky-American's response to LFUCG's First Request, Item 53. Explain how the $100,000 for deployment of acoustical devices is broken down by expense category. Include in the response the expense category as well as an amount.

Response:

The $100,000 referenced in LFUCG's First Request, Item 53 represents the capital cost of purchasing and installing the acoustical devices. These costs are charged to cost element 52000000 "M&S (O&M) – Natural Account" on a project on Item P "Tools and Equipment."

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: William A. Lewis

29. Refer to Kentucky-American's response to LFUCG's First Request, Item 54. For the following sentence, "[w]hen the meter is interrogated during the monthly, drive-by meter reading cycle, the meter flags the account as having a possible leak" provide the following:

a. Explain what interrogation means in this context.

b. Explain how the meter flags the account as having a leak.

c. Explain whose responsibility it is to initiate a leak investigation if an account is flagged.

d. Explain what steps are utilized to initiate a leak investigation and the timeline of those steps.

d. Explain what the parameters of a "leak" are in this context.

e. Explain the logic that the meter uses to flag an account for a leak. Is this logic pre-set by the meter vendor, and if so, can it be adjusted by Kentucky-American?

f. How is the customer notified of a potential leak?

Response:

A. In this context, interrogation refers to the wireless connection made between the meter reading receiving equipment located inside a company meter reading vehicle and the meter MIU located inside the meter pit. As the meter reading vehicle drives by a meter pit, the receiver communicates with the MIU and collects the meter reading from the MIU wirelessly.

B. While not all KAWC AMR meters have leak flagging capability, those that do will transmit a flag (alert) with the meter reading when the meter is interrogated during the meter reading cycle. The flag is identified within the meter reading software for that meter along with its meter reading. The alert information is not directly linked to KAWC's billing system, but is used by local meter department staff as a macro level tool to identify that a potential issue may exist. The "leak flag" does not necessarily indicate a leak, its volume, or duration, only that a continuous and uninterrupted flow of water passed through the meter over a predefined period of time established by the meter/MIU manufacturer. By contrast, KAWC's formal billing system incorporates a more detailed process to evaluate actual usage against historical meter usage and/or bill

amount for similar periods. Please reference response D below for additional detail on KAWC's automated billing notification process.

C. It is not possible for KAWC to definitively determine if a customer account has a leak through automated MIU alerts and/or usage and billing comparisons made by the billing system. It is only possible to identify a higher-than-normal level of usage or billing amount. This could be indicative a leak or actual non-routine high usage. KAWC's billing system will automatically generate a customer notice for high usage. High bill letters inform customers of their higher usage and provide information on potential causes. They also state that the Company will provide leak detection kits and other information to help customers identify high water usage. If customers cannot determine the cause of their unusual high usage, the Company encourages them to contact the Company to investigate further. In this context, it is the customer's responsibility to initiate a leak investigation as any metered leak will be located on the customer owned buried service line or internal plumbing. Upon request by the customer, KAWC will initiate a leak investigation and will take reasonable visual steps to help the customer identify if they have a leak, but it is ultimately the customer's responsibility to identify the exact location and extent of repair required to address the leak. Please reference response D below for further explanation of KAWC's automated billing system logic used to trigger customer notifications.

D. In this context, a leak would be defined as any customer owned service line, pipe plumbing, or associated plumbing fixture (e.g., toilet, sink, humidifier, irrigation system, etc.) where an uncontrolled amount of water is escaping or running and can be measured at the customer's water meter. For example, in a normal scenario, there should be no water flow or usage within the customer's entire plumbing system except for flows controlled by the customer. In this scenario, the meter will register zero water flow and consumption.

The Company has built into its customer information systems a method to automatically monitor usage and flag unusual deviations in customer usage.

a) Unusual deviations in customer usage may be flagged as a result of the dollar amount of customer bills or a customer's consumption. Warnings are given to customers under either high dollar or high use circumstances.
    a. For residential customers whose dollar amount is 200% and $200 higher than the customer's average from the prior year receive an automated High Bill letter alerting them to their usage and if the usage crosses a threshold, the system generates an order for manual review.
    b. Even if the dollar amount warnings are not triggered, the Company alerts customers if their water consumption is higher than 2.5 times the comparable period in the previous year.
    c. Additionally, all customer bills include numerical and graphical representations of consumption presented on the bill and symbols. Additionally, the bar chart graphic highlights a customer's monthly

consumption for the previous twelve months on their bill, so the customer can see how each month's use compares to the others.

b) Steps for each category are explained below.
    a. Dollar amount category
        i. Residential customers whose dollar amount is 200% and $200 higher than the customer's average from the prior year will receive an automatic High Bill letter warning of the use.
        ii. If dollar amount meets a threshold, the system automatically generates a manual review by the billing team to see if a letter needs to be issued or an RBL (read for billing) service order issued. An RBL service order is sent to the state operations team for a visual inspection of the meter to determine what is happening.
        iii. Most of the non-residential customers have the same threshold and process for usage deviations, but some categories, such as private fire, have higher thresholds.
    b. Consumption Category
        i. The criteria used for "unusual" or high consumption is enterprise wide for all bill classes. If consumption is between 2.5-5.99x or higher than for the same time period in the previous year, a High Bill letter will be sent automatically.
        ii. If consumption is 6x or greater than the same period in the previous year, the system will issue an RBL service order unless there is a service order in the past 60 days that confirms the current read and is in line. If no RBL order is issued because the read is in line with previous service order, the system will send a High Bill letter.

E. AMR meters that do have "leak flag" capability have a limited logic capacity and are only capable to flagging a meter on a customer's account that has measured constant, non-intermittent, flow through the meter for a specific period of time pre-defined by the meter manufacturer. KAWC does not have the ability to modify MIU logic, however the triggering of High Bill letters by the KAWC billing system uses programmed logic used by all American Water subsidiaries. Please reference response D above for a detailed explanation of this process. Neither the meter MIU logic nor the KAWC billing system has the capability to accurately define whether there is an actual leak on the customer account, only that a higher-than-normal usage or bill amount exists. A leak investigation would be required to determine if the higher-than-normal usage is a result of a leak or actual non-routine water usage.

F. Please reference response D above.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Harold Walker

30. Refer to Kentucky-American's response to Attorney General's First Request, Item 62. Explain what "reasonable time" is within the context of the following sentence, "[a]ll payments of invoices are made within a reasonable time after receipt of the invoice".

Response:

A "reasonable time after receipt of the invoice" is the "amount of time which is fairly necessary, conveniently, to do whatever is required to be done, as soon as circumstances permit." (https://definitions.uslegal.com/r/reasonable-time/).

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Harold Walker

31. Refer to Kentucky-American's response to Attorney General's First Request, Item 62. Provide examples of what the following sentence in the response means, using specific invoices and specific employees: "[i]n addition, depending on the type of service invoiced, different personnel and a different number of personnel are required for approval of each invoice's payment."

Response:

Please see KAW_R_PSCDR3_NUM031_080425_Attachment 1 for a copy of an invoice related to contracted security services that was reviewed and approved for payment by the Manager of Physical Security and paid pursuant to the invoice terms.

Please see KAW_R_PSCDR3_NUM031_080425_Attachment 2 for a copy of an employee's hotel invoice that was reviewed and approved by their direct supervisor pursuant to the Company's internal purchasing card policy. The individual's name is redacted.

Invoice

Invoice Number	2400873
Invoice Date	Mar 31, 2024
Supply Date	Mar 20, 2024
Currency	USD (US Dollar)
Payment Terms	45 days net
AW Contact	DEANDRE.LEWIS@AMWATER.COM

Supplier
Garrison Security Group LLC
Allentown, NJ
US (United States)

PO Box 457
Allentown 08501-0457

609-658-0250

Customer
Kentucky American Water Company
1 Water St
Camden, NJ 08102-1658
US (United States)

8667778426

8565199733

Ship To
Garrison Security Group
PO Box 457
Allentown, NJ 08501
US (United States)

Contact Email
holly@garrisonsecuritygroup.com

#	Description	Unit	Qty	Unit Price	Line Total
1	Security Professionals provided security services for employee termination as requested	HR (Hour)	75	$85.00	$6,375.00

Comment
Thank you for the opportunity to work with you.

Subtotal	$6,375.00
Total Tax Amount	$0.00
Invoice Amount	$6,375.00

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www.garrisonsecuritygroup.com

American Water Technology and Innovation #1 Water Street Camden, New Jersey 08102	American Water Technology and Innovation #1 Water Street Camden, New Jersey 08102	24-00873 03/31/2024 Net 10 minus 2% 04/10/2024

Lexington KY Emp Term KY

03/20/2024	A Security Professional provided security services for employee termination as requested. 1415-1800 5 hour minimum	5	85.00	425.00
03/21/2024	A Security Professional provided security services for employee termination as requested. 0600-1600	10	85.00	850.00
03/22/2024	A Security Professional provided security services for employee termination as requested. 0600-1600	10	85.00	850.00
03/25/2024	A Security Professional provided security services for employee termination as requested. 0600-1600	10	85.00	850.00
03/26/2024	A Security Professional provided security services for employee termination as requested. 0600-1600	10	85.00	850.00
03/27/2024	A Security Professional provided security services for employee termination as requested. 0600-1600	10	85.00	850.00
03/28/2024	A Security Professional provided security services for employee termination as requested. 0600-1600	10	85.00	850.00
03/29/2024	A Security Professional provided security services for employee termination as requested. 0600-1600	10	85.00	850.00

We appreciate the opportunity to work with you on this Protection Project.
Respectfully,
James D. South

SUBTOTAL	6,375.00
TAX	0.00
TOTAL	6,375.00
BALANCE DUE	**$6,375.00**

Pay invoice

DOUBLETREE HOTEL MOUNT LAUREL
515 FELLOWSHIP ROAD
MOUNT LAUREL, NJ 08054
United States of America
TELEPHONE 856-778-8999 • FAX 856 380-6058
Reservations
www.doubletree.com or 1-800-222-TREE

[redacted]

[redacted]

[redacted]

UNITED STATES OF AMERICA

Room No:	123/ND2SP
Arrival Date:	10/15/2024 4:13:00 PM
Departure Date:	10/16/2024 1:05:00 PM
Adult/Child:	1/0
Cashier ID:	HFARRUKH
Room Rate:	172.88
AL:	
HH #	[redacted]
VAT #	
Folio No/Che	701217 A

Confirmation Number: 94428685

DOUBLETREE HOTEL MOUNT LAUREL 10/16/2024 1:05:00 PM

DATE	REF NO	DESCRIPTION	CHARGES
10/15/2024	2842780	GUEST ROOM	$172.88
10/15/2024	2842780	RM NJ STATE TAX	$11.45
10/15/2024	2842780	RM OCCUPANCY TAX	$8.64
10/15/2024	2842780	RM MUNICIPAL TAX	$5.19
10/16/2024	2842990	[redacted]	($198.16)
		BALANCE	$0.00

Hilton Honors(R) stays are posted within 72 hours of checkout. To check your earnings or book your next stay at more than 6,500+ hotels and resorts in 119 countries, please visit Honors.com

CREDIT CARD DETAIL

APPR CODE	037711	MERCHANT ID	8014366382
CARD NUMBER	[redacted]	EXP DATE	01/27
TRANSACTION ID	2842990	TRANS TYPE	Sale

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Harold Walker

32. Refer to Kentucky-American's response to Attorney General's First Request, Item 63. Explain the following statement in the response, using specific dates as part of the explanation: "[t]he lead days for the payment of Service Company charges have increased since the Company's previous rate case application."

Response:

The Company does not pay for Service Company charges as fast as it did in the previous case. The lead days for the payment of Service Company charges were (5.3) days in the Company's previous rate case application and are (4.2) days in the Company's current rate case application. Therefore, the lead days for the payment of Service Company charges have increased 1.1 days since the Company's previous rate case application.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: John Magner

33. Refer to Kentucky-American's response to Attorney General's First Request, Item 69. Provide the chart in the response but include an additional row reflecting the projects' expenditures discussed in response to LFUCG's First Request, Item 52, inclusive of all the years provided in response to Item 69.

Response:

QIP Year	Period	Actual Expenditures	Forecasted Expenditures	Actual Unscheduled Main Replacement Expenditures
1	July 1, 2020 – June 30, 2021	$10,868,747	$8,218,500	$1,412,536.71
2	July 1, 2021 – June 30, 2022	$25,988,118	$19,786,820	$ 1,279,702.16
3	July 1, 2022 – June 30, 2023	$29,086,354	$17,908,700	$ 1,758,660.84
4	July 1, 2023 – June 30, 2024	$25,277,857	$20,150,799	$ 1,978,289.88
5	July 1, 2024 – Dec. 31, 2024	$0	$0	$ 1,139,950.42
6 (2025)	Feb. 1, 2025 – Dec. 31, 2025	-	$25,263,875	-

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: John Magner

34. Refer to Kentucky-American's response to Attorney General's First Request, Item 72. Provide specific projected in-service dates, using a month and year, of the projects that make up the $191.9 million.

Response:

Projected in service dates for projects included in the $191.9 million are provided in the workpapers provided by Kentucky American Water in the response to PSC's First Request, Item 1. The relevant information is provided on the "Actv PlacedInServc" tab of the "KAWC 2025 Rate Case – Capital-Depr Exp" Excel file provided in the Rate Base folder in the "Excel_Files.zip" file.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: John Magner and Dominic DeGrazia

35. Refer to Kentucky-American's response to Attorney General's First Request, Item 73.

a. Explain why Kentucky-American assumed 15 miles of water main replacement as part of the QIP when the Commission has approved between 11-13 miles of improvements and has not expanded the program.

b. Provide an updated information and calculations using at most 13 miles of water main replacement. Provide the response in an Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

Response:

a. The 15 miles of main referenced in the response includes all main replaced as part of Item B "Mains Replaced/Restored." This includes both Qualified Infrastructure Program ("QIP") and non-QIP eligible main replacements. Kentucky American Water ("KAWC") did not assume more than the 11-13 miles of QIP eligible main replacement.

b. Please see the response to part a. Information and calculations provided by KAWC as part of this filing assume no more than 13 miles of QIP-eligible water main replacement.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: John Magner

36. Refer to Kentucky-American's response to Attorney General's First Request, Item 73. Refer also to KAWC Rate Case – Exhibits (25, 26, 37) Revenue WP Support", Workbook Revenues Tab. Reconcile the information stated in the response: "KAWC used these actual costs as a base for forecasting spend in 2026, with the forecasted spend for 2026 increased to approximately $3.46 million to account for an expected increase in the number of new service requests resulting from the expansion of the Urban Service Boundary in Fayette County[.]" with the only approximate 3.93 percent total customer count increase by 2029. In the reconciliation, provide the calculation of new service operating expense based solely on the company's projected customer count increase as provided in the application. Provide the response in an Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

Response:

Kentucky American Water ("KAWC") notes that the increase in forecasted capital spend associated with the installation of new services and laterals from 2024 to 2026 is approximately 9.8%, whereas the projected increase in customer count through 2029 is approximately 3.93%.

Increases in capital spend associated with the installation of new services and laterals are not directly proportional to the number of new services installed. While increases in customer count will result in increased capital expenditures, other factors such as increases in material pricing, contract labor costs, and restoration costs also cause increases in capital expenditures for the installation of new services. The consideration of these factors, along with growth in customer counts, results in forecasted increases in capital expenditures associated with new service installations that relatively exceed the forecasted growth in customer count.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: William A. Lewis and Robert Prendergast

37. Refer to Kentucky-American's response to Attorney General's First Request, Item 73. Explain what technology projects Enterprise Solutions encompasses, and the amount for this item. Include in the response the allocation percentage used to allocate to Kentucky-American, the allocation of the full amount for each American Water subsidiary, and any benefits or efficiencies that it may create for Kentucky-American rate payers.

Response:

Enterprise Solutions projects include the implementation, upgrades, and enhancements to the core IT infrastructure, customer systems, operations and business support systems, and security-related systems necessary to continue to provide customers with service that is reliable and efficient. By completing technology projects on an enterprise-wide basis, Kentucky-American customers benefit because they share in the costs of implementing, maintaining and enhancing these systems, allowing KAWC to avoid the need to incur such costs on its own, which in turn benefits customers.

See the direct testimony of William A. Lewis (p. 25-28) for examples of technology projects that help improve water efficiency. In addition to improved efficiency, customers also benefit from industry-leading cyber controls that are designed, built and integrated into all aspects of the technology. As explained in Mr. Lewis's direct testimony (p. 23), these investments, including enhancements to controls of identity and management of access to our systems, monitoring of sensitive information, and increased visibility of potential intrusion attempts to our systems, protect our existing systems and enable the implementation of secure innovation. This helps safeguard the integrity of Company information and systems, as well as customer data, while enhancing the customer experience.

Please also refer to the Company's response to Attorney General's second request, item 75 for additional discussion regarding the Enterprise Solutions projects.

KAWC is allocated 4.24% of the American Water system costs related to these enterprise solution projects. This allocation is based upon customer count. The full amount of forecasted enterprise solutions projects placed in service for the forecasted base period and forecasted test year (Mar 2025-Dec 2026) is $15,155,029.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Dominic DeGrazia

38. Refer to Kentucky-American's response to Attorney General's First Request, Item 86. Confirm that Kentucky-American is requesting Commission approval for the 15-year amortization term. If not confirmed, explain why not. If confirmed, provide a list of all regulatory asset projects Kentucky-American is requesting approval for an amortization period. Include in the response a description of the project, the expenses related to the project and the proposed term of amortization related to the expense.

Response:

Confirmed. Kentucky-American is requesting Commission approval for the 15-year amortization of each of the following projects: Mt. Sterling/Wilson Street Tank, Clays Mill Tank #1, Cox St. Ground/Elevated Tank and Woodlake Tank.

Please refer to KAW_R_AGDR1_NUM087_070725 for a description of each project.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Robert Prendergast

39. Refer to Kentucky-American's response to Attorney General's First Request, Items 97-98. Provide the written policy for all employee awards, including the spot and service awards, as well as the evaluation form or criteria used to make the award determination.

Response:

Attached is the Company's Compensation and Benefits Policy as KAW_R_PSCDR3_NUM039_080425_Attachment_CONFIDENTIAL, which includes the policy for spot and service awards on page 2. The policy is confidential and is being provided pursuant to a petition for confidential protection.

KAW_R_PSCDR3_NUM039_080425_Attachment_CONFIDENTIAL FILED UNDER SEAL PURSUANT TO THE PETITION FOR CONFIDENTIAL TREATMENT FILED ON AUGUST 4, 2025

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Max McClellan

40. For each nonrecurring charge listed in Kentucky-American's tariff, provide:

a. The cost justification for each,

b. The number of occurrences for each, by month, for the years 2022, 2023, 2024, and 2025 to date; and

c. Provide the amount collected for each charge for the same periods set forth in Item 45(b).

Response:

a. Please refer to "KAW_R_PSCDR3_NUM040_080425_Attachment 1" for the requested cost justifications. Kentucky-American also notes it is not proposing to revise any of its current nonrecurring charges in this proceeding. Tapping fees were last updated in 2018 in Case No. 2018-00358. The activation fee and disconnection fee were revised in 2012 in Case No. 2012-00520. The late payment fee was established in Case No. 2012-00155 and has not changed since implementation. The insufficient funds fee has remained unchanged since 1993, and the service line inspection fee has not changed since at least 1988.

b. Please refer to "KAW_R_PSCDR3_NUM040_080425_Attachment 2" for the number of occurrences by month where applicable for the years 2022, 2023, 2024, and 2025 to date.

c. Please refer to "KAW_R_PSCDR3_NUM040_080425_Attachment 2" for the amount collected for each charge by month for the years 2022, 2023, 2024, and 2025 to date.

Kentucky-American Water Company
Activation of Water Service
Cost of Meter Reading & Record Change

	Description	Calculation	
a	Base Wage FSRs in Test Year	$	35.59
b	Overhead ratio		44%
c = a*(1+b)	Base rate with overheads	$	51.35
d	Non-productive rate		17.37%
e=c*(1+d)	Working hourly rate with overheads	$	60.27
f	Approximate order + Transit time in minutes		28
g = e*f/60	Weighted wages and overheads for related field service order	$	28.12
h	Vehicle related costs as a fraction of field service labor costs		8.0%
i= g x (1+h)	Weighted average FSR wages and overheads w/ vehicle costs	$	30.37
j	Average Monthly Occurrence		2,084
k=j*12	Estimated Annual Number of Occurrence		25,014
l = i*k	Estimated Annual FSR Labor & Vehicle Costs	$	759,736
	Call Center/Customer Service		
m	Average Hourly Call Center Associate Rate	$	23.61
b	Overhead ratio		44%
n = m*(1+b)	Base rate with overheads	$	34.06
d	Non-productive rate		17.37%
o = n*(1+d)	Working hourly rate with overheads	$	39.98
p	Approximate processing time in minutes		10
q = o*p/60	Weighted wages and overheads for related customer service	$	6.57
r = q*k	Estimated Annual Call Center Costs	$	164,451
s	Postage & Printing	$	0.56
t = s*k	Estimated Annual Postage & Printing Costs	$	13,922
u = l + r + t	Annual Application/Activation Cost	**$**	**938,109**
v = u/k	**Application/Activation Cost per Occurrence**	**$**	**37.50**

Kentucky-American Water Company
Late Payment Fee
Cost to Process Delinquent Payments

	Description	Calculation	
	Call Center/Collection Service		
a	Average Hourly Call Center Associate Rate	$	23.44
b	Overhead ratio		44%
c = a*(1+b)	Base rate with overheads	$	33.83
d	Non-productive rate		17.37%
e=c*(1+d)	Working hourly rate with overheads	$	39.70
f	Approximate processing time in minutes		6
g = e*f/60	Weighted wages and overheads for related customer service	$	3.93
h	Average Number of Occurrences		20,800
i = h*12	Estimated Annual Number of Occurrence		249,605
j= g * i	Estimated Annual Call Center Costs	$	979,941
k	Collection Agency Fees	$	5,152
l = k*i	Postage & Printing	$	0.56
m = l*i	Postage Costs for Collection Notices	$	138,925
n	Uncollectible Expense	$	626,717
o = j+k+m+n	Annual Late Payment Processing Cost	**$**	**1,750,735**
p = o/i	**Late Payment Processing Cost per Occurrence**	**$**	**7.01**

Kentucky-American Water Company
Insufficient Funds Charge
Cost to Process NSF

	Description	Calculation
	Call Center/Collection Service	
a	Average Hourly Call Center Associate Rate	$ 23.44
b	Overhead ratio	44%
c = a*(1+b)	Base rate with overheads	$ 33.83
d	Non-productive rate	17.37%
e=c*(1+d)	Working hourly rate with overheads	$ 39.70
f	Approximate processing time in minutes	7
g = e*f/60	Weighted wages and overheads for related customer service	$ 4.43
h	Average Number of Occurrences	242
i = h*12	Estimated Annual Number of Occurrence	2,902
j= g * i	Estimated Annual Call Center Costs	$ 12,867
	Cash Accounting & Reconciliation	
k	Average Hourly Cash Accountant Rate	$ 44.64
b	Overhead ratio	44%
l = k*b	Base rate with overheads	$ 64.42
d	Non-productive rate	17.37%
m=l*(1+d)	Working hourly rate with overheads	$ 75.61
n	Approximate processing time in hours in a month	4
o = n*m*12	Estimated Annual Cash Accounting Cost	$ 3,629.08
p	Postage & Printing	$ 0.56
q = p*i	Postage Costs for Notification Letter	$ 1,615

	Bank Charges	Annual Volume (r)	Unit Price (s)	Total Charge t = (r) * (s)
	Returned Deposited Items	178	$ 1.00	$ 178
	Returned Item Special Instruction	12	$ 3.50	$ 42
	Redeposited Returned Item	78	$ 0.55	$ 43
	Returned Item Transmission			$ 200
				$ 463
	ACH Redeposited Item	1,153	$ 0.50	$ 577
	Unauth ACH Return - per item	59	$ 5.00	$ 295
	ACH Return - per item	2,474	$ 0.75	$ 1,856
u				$ 2,727

v = j+o+q+u	Total NSF Cost	**$ 20,838.18**
w = v/i	**NSF Cost per Occurrence**	**$ 7.18**

Kentucky-American Water Company
Reconnection Charge
Cost to Turn on & Reactivate Water Service

	Description (*)	Calculation	
a	Base Wage FSRs in Test Year	$	35.59
b	Overhead ratio		44%
c = a*(1+b)	Base rate with overheads	$	51.35
d	Non-productive rate		17.37%
e=c*(1+d)	Working hourly rate with overheads	$	60.27
f	Approximate order + Transit time in minutes		37
g = e*f/60	Weighted wages and overheads for related field service order	$	37.16
h	Vehicle related costs as a fraction of field service labor costs		8.0%
i= g x (1+h)	Weighted average FSR wages and overheads w/ vehicle costs	$	40.14
j	Average Monthly Occurrence		358
k=j*12	Estimated Annual Number of Occurrence		4,294
l = i*k	Estimated Annual FSR Labor & Vehicle Costs	$	172,341
	Call Center/Customer Service		
m	Average Hourly Call Center Associate Rate	$	23.61
b	Overhead ratio		44%
n = m*(1+b)	Base rate with overheads	$	34.06
d	Non-productive rate		17.37%
o = n*(1+d)	Working hourly rate with overheads	$	39.98
p	Approximate processing time in minutes		10
q = o*p/60	Weighted wages and overheads for related customer service	$	6.36
r = q*k	Estimated Annual Call Center Costs	$	27,324
s	Postage & Printing	$	0.56
t = s*k	Estimated Annual Postage & Printing Costs	$	2,390
u = l + r + t	Annual Reconnection Cost	$	202,055
v = u/k	**Reconnection Cost per Occurrence**	**$**	**47.06**

Kentucky-American Water Company
Service Line Inspection Charge
Cost of Service Line Inspection

	Description	Calculation	
a	Base Wage FSRs in Test Year	$	35.59
b	Overhead ratio		44%
c = a*(1+b)	Base rate with overheads	$	51.35
d	Non-productive rate		17.37%
e=c*(1+d)	Working hourly rate with overheads	$	60.27
f	Approximate order + Transit time in minutes		33
g = e*f/60	Weighted wages and overheads for related field service order	$	33.15
h	Vehicle related costs as a fraction of field service labor costs		8.0%
i= g x (1+h)	Weighted average FSR wages and overheads w/ vehicle costs	$	35.80
	Call Center/Customer Service		
j	Average Hourly Call Center Associate Rate	$	23.61
b	Overhead ratio		44%
k = j*(1+b)	Base rate with overheads	$	34.06
d	Non-productive rate		17.37%
l = k*(1+d)	Working hourly rate with overheads	$	39.98
m	Approximate processing time in minutes		8
n = l*m/60	Weighted wages and overheads for related customer service	$	5.61
o = i+n	**Service Line Inspection Cost per Occurrence**	**$**	**41.40**

Kentucky-American Water Company
Tap Fee Calculation

Standard 5/8" Tap (w/ 15' copper)
(No Street Cut - Additional $4,000)

Materials	
1" Corp	$51
3/4 Copper	$78
Coupling	$17
5/8 Setter	$92
18" Meter Box	$27
Frame	$33
Lid	$27
8x1 Tapping Saddle	$89
Meter	$83
MIU	$91
Installation	$1,800
TOTAL	**$2,389**

Standard 1" Tap (w/ 15' copper)
(No Street Cut - Additional $4,000)

Materials	
1" Corp	$51
1" Copper	$113
Coupling	$17
1" Setter	$207
20" Meter Box	$83
Frame	$35
Lid	$27
8x1 Tapping Saddle	$89
Meter	$156
MIU	$91
Installation	$1,800
TOTAL	**$2,668**

Standard 1.5"Tap (w/15' Copper)
(No Street Cut - Additional $4,000)

Materials	
1" Corp (x3)	$153
1" Copper	$339
3-Way Wye Branch	$117
2" Setter	$1,058
36" Meter Box	$302
36" Lid	$811
2x12" Brass Nipple	$46
8x1 Tapping Saddle (x3)	$267
Meter	$419
MIU	$91
Installation	$1,800
TOTAL	**$5,403**

Standard 2"Tap (w/15' Copper)
(No Street Cut - Additional $4,000)

Materials	
1" Corp (x3)	$153
1" Copper	$339
3-Way Wye Branch	$117
2" Setter	$1,058
36" Meter Box	$302
36" Lid	$811
2x12" Brass Nipple	$46
8x1 Tapping Saddle (x3)	$267
Meter	$493
MIU	$91
Installation	$1,800
TOTAL	**$5,477**

Kentucky American Water Company
Case No. 2025-00122
Other Revenues by Category - Occurences and Revenues by Month

Occurences

Account Number	Account Description	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
40310100	OthRev-Late Pymt Fee	25,714	22,634	22,214	21,734	23,240	25,728	22,256	24,789	21,261	23,410	22,404	22,897	23,163	21,229	20,790	20,264	23,816	25,542	17,769	20,590	21,136	19,905	22,232	22,346	24,274	21,626	20,962	20,659	21,243	20,885	21,492	16,491	19,435	5,147	41	19,497	25,263	21,788	19,847	21,253	19,487	20,665
40310400	OthRev-NSF Ck Chrg	192	196	233	205	195	273	263	269	232	291	270	254	201	170	230	206	277	273	226	297	241	246	219	256	263	241	241	245	266	244	300	238	136	306	236	276	257	327	281	244	261	265
40310500	OthRev-Appl/InitFee	1,439	1,261	1,622	1,814	2,104	2,251	2,705	3,012	2,034	1,848	1,629	1,627	1,548	1,526	1,905	1,737	2,241	2,468	2,724	3,018	1,958	1,987	1,751	1,704	1,738	1,744	1,846	2,186	2,531	2,583	3,257	3,392	2,166	1,807	1,922	1,956	1,779	1,725	2,077	2,289	2,751	2,876
40310700	OthRev-Reconnct Fee	285	268	363	346	275	212	196	309	678	309	456	316	288	262	466	445	388	401	286	256	382	342	565	460	518	727	644	487	540	271	532	248	178	62	5	116	297	366	545	385	462	552
40313000	OthRev-AfterHrsChrg																										2																
	Total	**27,630**	**24,359**	**24,432**	**24,099**	**25,814**	**28,464**	**25,420**	**28,379**	**24,205**	**25,858**	**24,759**	**25,094**	**25,200**	**23,187**	**23,391**	**22,652**	**26,722**	**28,684**	**21,005**	**24,161**	**23,717**	**22,480**	**24,767**	**24,766**	**26,793**	**24,340**	**23,693**	**23,577**	**24,580**	**23,983**	**25,581**	**20,369**	**21,915**	**7,322**	**2,204**	**21,845**	**27,596**	**24,206**	**22,750**	**24,171**	**22,961**	**24,358**

Revenues

Account Number	Account Description	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
40310100	OthRev-Late Pymt Fee	$76,663	$67,944	$63,005	$55,105	$64,810	$60,067	$59,837	$80,091	$62,997	$66,843	$66,582	$65,093	$73,055	$62,261	$62,591	$53,545	$63,674	$60,106	$57,483	$65,724	$62,306	$72,782	$67,168	$76,230	$88,014	$70,031	$63,497	$71,395	$78,941	$83,884	$87,796	$24,785	$43,598	$15,740	-$583	$72,754	$95,813	$88,531	$82,403	$56,250	$73,249	$70,115
40310200	OthRev-Rent	8,954	10,954	8,954	8,954	8,954	3,715	8,954	8,954	5,510	5,510	5,510	20,785	8,954	8,954	16,464	3,444	14,464	10,544	8,954	8,954	8,954	8,954	8,954	8,954	8,954	8,954	8,954	8,954	13,536	8,954	8,954	10,503	9,470	12,560	9,770	9,770	9,770	9,770	9,770	11,770	9,770
40310250	OthRev-Rent I/C	12,911	12,911	12,911	12,911	12,911	12,911	12,911	12,911	12,911	12,911	12,911	12,911	18,747	18,747	18,747	18,747	18,747	18,747	18,747	18,747	18,747	18,747	18,747	18,747	19,020	19,020	19,020	19,020	19,020	19,020	19,020	19,020	19,020	19,020	19,020	19,020	2,103	2,103	2,103	6,821	3,282	3,282
40310300	OthRev-CFO																																								130		
40310400	OthRev-NSF Ck Chrg	2,304	2,352	2,796	2,460	2,340	3,276	3,156	3,228	2,784	3,492	3,240	3,048	2,412	2,040	2,760	2,472	3,324	3,276	2,712	3,564	2,892	2,952	2,628	3,072	3,156	2,892	2,892	2,940	3,192	2,928	3,600	2,856	1,632	3,672	2,832	3,312	3,084	3,924	3,372	2,928	3,132	3,180
40310500	OthRev-Appl/InitFee	38,108	33,068	43,829	48,888	55,608	60,567	73,052	79,914	53,120	46,144	42,196	42,702	39,256	39,569	48,916	43,820	59,220	64,344	70,280	74,648	49,440	49,818	44,492	42,056	41,497	40,371	43,064	51,519	61,180	59,108	77,980	76,608	52,024	42,176	42,951	40,264	39,256	39,452	47,036	53,396	63,532	68,294
40310600	OthRev-Usage Data	4,841	5,350	5,094	5,554	4,973	5,714	4,591	4,679	5,577	4,100	5,674	5,161	4,969	4,721	5,001	5,679	4,361	5,602	5,173	5,174	5,730	5,366	4,937	4,934	5,179	5,145	5,132	5,636	4,664	5,216	5,201	5,267	5,217	5,105	5,156	5,079	4,398	5,666	4,894	5,457	5,156	5,160
40310700	OthRev-Reconnct Fee	37,268	36,358	41,468	42,476	36,610	34,622	33,306	39,172	59,936	39,242	46,592	39,816	37,296	35,812	47,852	47,208	43,512	43,512	41,071	37,201	65,982	41,202	53,466	70,568	29,778	40,642	14,378	48,482	51,198	37,086	51,842	36,288	32,368	25,592	21,980	28,826	38,692	41,496	52,906	44,570	47,516	52,920
40313000	OthRev-AfterHrsChrg																										112																
40319900	OthRev-Misc Svc	0	0	0	0	0	0	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,650	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594	4,594						32	3					
	Total	**$181,048**	**$168,936**	**$178,057**	**$176,348**	**$186,205**	**$180,872**	**$200,400**	**$233,542**	**$207,429**	**$182,835**	**$187,299**	**$194,110**	**$189,283**	**$176,697**	**$206,925**	**$179,508**	**$211,952**	**$210,725**	**$209,013**	**$218,606**	**$218,644**	**$204,414**	**$204,986**	**$229,155**	**$200,192**	**$191,762**	**$161,531**	**$212,541**	**$236,326**	**$220,790**	**$254,393**	**$175,328**	**$163,329**	**$123,866**	**$101,126**	**$179,057**	**$193,119**	**$190,942**	**$202,483**	**$179,323**	**$207,637**	**$212,721**

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Max McClellan and William A. Lewis

41. Provide the number of leak adjustments, by month, for the years 2022, 2023, 2024, and 2025 to date with the following information

    a. The total amount of the adjustments, per month;

    b. The reason(s) for the adjustment(s).

Response:

    a. Please refer to "KAW_R_PSCDR3_NUM041_080425_Attachment" for the number of leak adjustments and total amount of the adjustments by month for the years 2022, 2023, 2024, and 2025 to date.

    b. Please refer to the Company's response to Kentucky-American's response to LFUCG's First Request, Item 48, for the terms and conditions that an adjustment is required to meet in order to be granted.

Kentucky American Water Company
Case No. 2025-00122
Leak Adjustments by Month

Month	Leak Adjustments	Leak Adjustments $
Jan-22	20	-$10,657
Feb-22	44	-$38,825
Mar-22	46	-$30,991
Apr-22	18	-$5,085
May-22	29	-$21,461
Jun-22	28	-$20,203
Jul-22	21	-$22,756
Aug-22	13	-$8,106
Sep-22	31	-$27,712
Oct-22	33	-$16,195
Nov-22	41	-$30,955
Dec-22	22	-$20,302
Jan-23	37	-$22,699
Feb-23	62	-$51,027
Mar-23	64	-$63,763
Apr-23	36	-$27,411
May-23	30	-$33,951
Jun-23	27	-$35,634
Jul-23	14	-$10,588
Aug-23	28	-$28,328
Sep-23	28	-$14,318
Oct-23	23	-$34,982
Nov-23	31	-$25,037
Dec-23	29	-$12,672
Jan-24	45	-$35,559
Feb-24	38	-$32,187
Mar-24	44	-$32,493
Apr-24	35	-$24,896
May-24	46	-$25,691
Jun-24	18	-$28,266
Jul-24	30	-$38,862
Aug-24	34	-$36,835
Sep-24	26	-$18,445
Oct-24	24	-$13,053
Nov-24	20	-$150,548
Dec-24	20	-$25,009
Jan-25	33	-$22,593
Feb-25	41	-$42,726
Mar-25	54	-$69,386
Apr-25	58	-$108,975
May-25	34	-$102,180
Jun-25	31	-$27,129

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Max McClellan

42. Refer to Direct Testimony of Max McClellan, generally. Confirm that the demand information accounted for the water loss percentage. If not confirmed, provide updated demand information where the water loss percentage is accounted for.

Response:

Any customer demand information referenced in the Direct Testimony of Max McClellan is provided in the context of the cost-of-service study and rate design, which are based on billed customer usage (metered consumption for which customers are charged). For the system demand or system delivery information, both billed usage and non-revenue water were accounted for.

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Witness: Robert Prendergast

43. Refer to Kentucky-American's response to Attorney General's First Request, Item 5. Confirm the amount provided for Utility Water Conservation, total compensation is per employee for the proposed four employees to address the leak issue. If not, explain the amount by component per employee.

Response:

The response to Attorney General's First Request, Item 5 shows a singular vacancy for Utility Water Conservation, "Utility Water Conservation 32BJ KY". The "Total Compensation" is for this individual employee at a gross compensation level, exclusive of any capitalization or wastewater adjustment.