

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2025-00122
ATTORNEY GENERAL'S SECOND REQUEST FOR INFORMATION

Witness: Robert Prendergast

3. Refer to Kentucky American's response to the Attorney General's First Request, Item 5.
- a. Provide an update as to all prior vacant positions and all new vacant positions.
Consider this an ongoing request throughout the pendency of this case.
 - b. Provide an update to the KAW_R_AGDR1_NUM005_070725 attachment.
Consider this an ongoing request throughout the pendency of this case.

Response:

- a. Three vacant positions have been filled, a Sr WQ & Env Compliance Specialist, a Sr Project Engineer, and a Plant Operator position. In addition, a union Treatment Plant Operator position has become vacant.
- b. Please see KAW_R_AGDR2_NUM003_080425_Attachment. A portion of this attachment is confidential and is being provided pursuant to a petition for confidential protection.

August 8, 2025 Supplemental Response:

- a. A union Treatment Plant Operator position has become vacant.
- b. Please see KAW_R_AGDR2_NUM003_080825_SUPP_Attachment. A portion of this attachment is confidential and is being provided pursuant to a petition for confidential protection submitted on August 4, 2025.

CONFIDENTIAL INFORMATION REDACTED

Kentucky American Water Company

Case No. 2025-00122

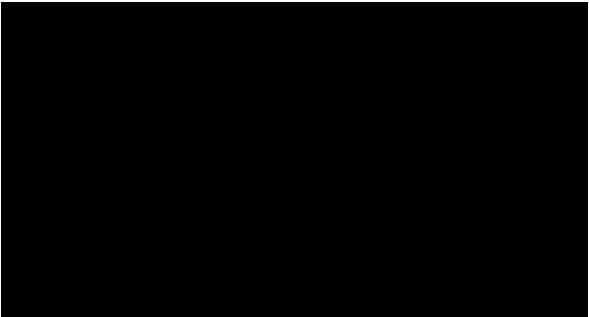
KAW_R_AGDR2_NUM003_080425_Attachment2

Job Title	Salary	Taxes	Benefits	Group Insurance	Total Compensation	Hire Date/ Planned Hire Date	Period of vacancy	Reason for vacancy	Organizational need
Maintenance Technician II						12/31/2025	1/20/2025	Employee Bid into another position	The central KY system only has 5 maintenance technicians that are responsible for all maintenance activities at two surface water plants and all remote facilities (pump stations and tanks). This vacancy reduces our maintenance resources by 20% and needs to be filled to ensure compliance with required preventative and emergency maintenance. The vacancy also increases the need for OT hours and reduces the total number of employees available for emergency call-out work after hours and on-call shift schedules.
Maintenance Technician I						12/31/2025	5/17/2025	Employee Bid into another position	The central KY system only has 5 maintenance technicians that are responsible for all maintenance activities at two surface water plants and all remote facilities (pump stations and tanks). This vacancy reduces our maintenance resources by 20% and needs to be filled to ensure compliance with required preventative and emergency maintenance. The vacancy also increases the need for OT hours and reduces the total number of employees available for emergency call-out work after hours and on-call shift schedules.
Utility (L&C)						2/10/2025	Growth Position	N/A	This position is responsible for performing a variety of tasks including but not limited to locating, laying, repairing, and extending underground water mains and distribution pipes related to Lead and Copper.
Utility (L&C)						2/11/2025	Growth Position	N/A	This position is responsible for performing a variety of tasks including but not limited to locating, laying, repairing, and extending underground water mains and distribution pipes related to Lead and Copper.
Utility (L&C)						4/29/2025	Growth Position	N/A	This position is responsible for performing a variety of tasks including but not limited to locating, laying, repairing, and extending underground water mains and distribution pipes related to Lead and Copper.
Utility (L&C)						5/19/2025	Growth Position	N/A	This position is responsible for performing a variety of tasks including but not limited to locating, laying, repairing, and extending underground water mains and distribution pipes related to Lead and Copper.
Utility						4/21/2025	10/2/2024	Employee Departure	This position is responsible for performing a variety of tasks including but not limited to locating, laying, repairing, and extending underground water mains and distribution pipes and any other work as assigned by the supervisor. This position directly works in the Central region of KY and is currently around 60% capitalized. Preventative maintenance is also performed by the position to inspect hydrants, valves, and possible leaks in the distribution system
Utility						4/22/2025	10/11/2024	Employee Departure	This position is responsible for performing a variety of tasks including but not limited to locating, laying, repairing, and extending underground water mains and distribution pipes and any other work as assigned by the supervisor. This position directly works in the Central region of KY and is currently around 60% capitalized. Preventative maintenance is also performed by the position to inspect hydrants, valves, and possible leaks in the distribution system
Treatment Plt. Operator						5/19/2025	10/31/2024	Employee Departure	Operates and maintains water/wastewater treatment, processing, disposal and testing equipment in facility to permit and operational requirements.
Utility Water Conservation 32BJ KY						4/21/2025	10/2/2024	Employee Departure	NRW Program - Leak Detection
Crew Leader								Employee Departure	Responsible for troubleshooting, repairing and installing T&D facilities including using valve keys to turn facilities off and/or on, excavating facilities and make repairs, connections or installations, using pipeline locators to confirm underground utility locates, ensuring water quality samples are taken and environmental safeguards are followed.
Business Support Specialist						12/31/2025	Growth Position	N/A	Customer support for NSA and Backflow
Business Support Specialist						12/31/2025	Growth Position	N/A	Customer support for NSA and Backflow
Operations Specialist						5/12/2025	Growth Position	Employee Transfer	Provides operational, administrative, analytical and technical support to the Water Quality department to assist with Lead and Copper.
Operations Specialist						12/31/2025	7/1/2023	Employee Retirement	Provides operational, administrative, analytical and technical support to the Field and Production departments. Assist supervision with scheduling work, briefing employees, completing tasks, etc.

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Maintenance Service Spec						12/31/2025	6/24/2024	Employee Promotion	Provide input for preparing and controlling local maintenance and preventive maintenance within established budget limitations. Ensure local water and/or wastewater operations meet the required maintenance standards and preventive maintenance standards on mechanical equipment, electrical equipment, instrumentation, and computer equipment. Advise and/instruct company personnel on proper operation and maintenance procedures for equipment and systems.
Plant Operator						7/14/2025	12/13/2024	Employee Departure	Operates and maintains water/wastewater treatment, processing, disposal and testing equipment in facility to permit and operational requirements. The Manager of Operations Services will, with the exception of the new center led customer team, lead all the duties formally held by RJ Sherman. In addition, this role will lead the NRW program, supports the MA program, and provides operations specific project management necessary to complete operations initiatives and operations owned capital delivery. With the new center lead customer model, several functions formally managed by our local customer advocacy team will be owned by the operations services team.
Migr. Operations Services						12/31/2025	12/23/2024	Employee Promotion	The Maintenance Supervisor will oversee maintenance technicians in the Central region and the Operations Specialist who is the Production Map-Call lead and assessing the condition and operation of mechanical components and conducting preventative maintenance on the equipment within the water treatment and remote production facilities (such as pumps, motors, generators, booster stations, tank control valves, chemical feed systems, system delivery meters, and waste residuals management equipment). Other duties of this position include maintaining regulatory compliance with state, local, and federal regulations, management of Q-line capital projects, coordination with SCADA team for L-line capital projects, and on-site coordination of large capital pump/motor/valve projects. This supervisor also participates in the Production On-Call rotation to ensure maintenance staff respond to emergencies and plants have supervisor coverage 24/7. This position was eliminated after the prior supervisor left the business and duties were redistributed among the WTP supervisors for RRS and KRS1 treatment plants. The reorganization has resulted in an overall reduction of field supervision of the maintenance team, less dedicated focus on WTP and remote site maintenance activities, and reduced leadership maintenance expertise. This position will be filled with an existing vacancy being held for this purpose.
Supvr Opns (Maintenance)						4/28/2025	12/30/2023	Employee Departure	The Director of Engineering leads the overall planning, capital program, project delivery, and other centralized support functions including developer services, tank maintenance, property/ROW, and other special projects for the state of Kentucky.
Director Engineering						3/17/2025	1/28/2025	Employee Promotion	Undertakes assignments and activities related to the development of water and wastewater infrastructure projects including preparation of feasibility studies, acquisition of permits, and design of facilities. Typical projects include, but are not limited to, potable water wells, treatment facilities, storage tanks, and water distribution systems along with sewers, pumping stations, septic systems, and wastewater treatment facilities.
Planning Engineer						6/30/2025	Growth Position	N/A	This position will manage larger developer funded projects, main extensions, and main relocations, as well as some main replacements. Currently, KAW's engineering team has one Staff Engineer and one Sr. Engineering Designer who manage developer funded projects (80 projects, \$6.8M in 2024). KAW does not currently have a project manager to oversee company funded water main projects outside of the QIP main replacement program. The requested position is needed to deliver these company funded water main projects, which represent approximately \$7-10 million in capital spend annually. This position will also assist the business development team with due diligence investigations.
Sr. Project Eng						7/14/2025	11/25/2024	Employee Promotion	Supervisor to oversee and manage Lead and Copper efforts.
Supvr. Water Quality & Env. Compliance						4/28/2025	Growth Position	N/A	

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Supvr Opns (New Services)						12/31/2025	11/11/2024	Employee Promotion	KY wastewater operations are currently overseen by the production department. There are five separate systems inclusive of wastewater treatment plants, lift stations and collection systems. While wastewater operations report into the production department, there is not an operation supervisor resource between field operators and the Sr. Manager of Production to adequately manage day to day wastewater activities and to ensure environmental compliance. KY has also lost key wastewater knowledge and experience due to recent retirements. To address this gap, KY will repurpose an existing vacant operations supervisor position to establish a wastewater operations supervisor role that will report to the Sr. Manager of Production. This role will be responsible for all wastewater treatment plant and collection system operations, will oversee existing plant operators, will direct other wastewater field activities and will coordinate preventative maintenance, repair and capital improvements for the wastewater systems. In addition, this position will be responsible for wastewater permit compliance and reporting. This is a headcount neutral reorganization.
Plant Operator						12/31/2025	7/22/2025	Employee Departure	Operates and maintains water/wastewater treatment, processing, disposal and testing equipment in facility to permit and operational requirements.