

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF KENTUCKY-	)	
AMERICAN WATER COMPANY FOR A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	CASE NO. 2025-00240
AND NECESSITY FOR INSTALLATION OF	)	
ADVANCED METERING INFRASTRUCTURE	)	

KENTUCKY-AMERICAN WATER COMPANY’S DATA REQUESTS
TO THE ATTORNEY GENERAL

Kentucky-American Water Company (“Kentucky American Water” or “Company”) respectfully submit the following data requests to the Office of the Attorney General (“AG”) to be answered by October 29, 2025 as specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on August 6, 2025.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, Joint Intervenors, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if AG receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If AG objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

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

8. In the event any document requested has been destroyed or transferred beyond the control of AG, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of or active link to the document rather than a reference to the record where the document is located.

Data Requests

1. Reference Mr. Holloway's October 14, 2025 Corrected Testimony. Please confirm that the Corrected Testimony reflects a removal of [REDACTED] per month per customer cost on pages 4, 20, and 24 of the Corrected Testimony and that the original inclusion of [REDACTED] was a mistake based on an incorrect interpretation of KAW's AMI Plan. If not confirmed, please explain why confirmation is not possible.
2. Reference Mr. Holloway's October 14, 2025 Corrected Testimony. Please confirm that the [REDACTED] per month per customer cost described at page 30 of KAW's AMI Plan and shown in Figure 23 at page 31 of KAW's AMI Plan is the correct cost to be considered. If not confirmed, please explain why you cannot confirm or otherwise explain the removal of the [REDACTED] per month per customer cost in the corrected testimony.

Dated: October 17, 2025

Respectfully submitted,



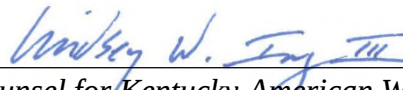
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CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8 as modified by the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on October 17, 2025; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



Counsel for Kentucky-American Water Company