

**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 AND	)	
NECESSITY FOR INSTALLATION OF ADVANCED	)	CASE NO. 2025-00240
METERING INFRASTRUCTURE	)	

REBUTTAL TESTIMONY OF KRISTA E. CITRON, PE, MBA

October 29, 2025

INTRODUCTION

Q. Please state your name, position, and business address.

A. My name is Krista Citron. I am a Senior Manager, Operational Performance for American Water Works Service Company, Inc. (“AWWSC”). My business address is 2300 Richmond Road, Lexington, Kentucky 40502.

Q. Have you filed Direct Testimony in this matter?

A. Yes. I filed written direct testimony in support of Kentucky-American Water Company’s (“KAWC”) July 11, 2025 Application in this matter.

Q. What is the purpose of your rebuttal testimony in this proceeding?

A. The purpose of my rebuttal testimony is to respond to Mr. Larry Holloway’s October 1, 2025 testimony filed on behalf of the Attorney General of the Commonwealth of Kentucky (“AG”) that was corrected in the AG’s October 14, 2025 filing. I will summarize the main points Mr. Holloway makes and describe how they are consistent with KAWC’s AMI Plan¹ which included a Cost Benefit Analysis (“CBA”) that I described and sponsored in my direct testimony. Because Mr. Holloway’s testimony and conclusions are consistent with KAWC’s AMI Plan, they support approval of a Certificate of Public Convenience and Necessity (“CPCN”) for Advanced Metering Infrastructure (“AMI”). Thus, my recommendation continues to be that the Commission should issue a CPCN for AMI because it is good for customers.

Q. Please summarize Mr. Holloway’s testimony.

A. Mr. Hollway supports KAWC’s request for approval of AMI. He makes the following important conclusions:

¹ KAWC’s AMI Plan is attached to KAWC’s July 11, 2025 Application.

- 1 • KAWC’s AMI implementation plan to replace its existing inventory of Automatic
2 Meter Reading (“AMR”) capable meters with AMI capable meters over a 10-year
3 time frame when the existing AMR meters are removed is a reasonable approach.²
- 4 • KAWC’s CBA is not unreasonable and is likely a conservative assessment of AMI
5 benefits that will be provided to customers.³
- 6 • For as little as 11 cents per month, customers will realize the benefits of AMI.⁴
- 7 • The actual metering device for both AMR and AMI capable meters can be the same.
8 The main difference is how the endpoint that sits on the meter transmits usage data.
9 It is either through AMR or AMI technology.⁵
- 10 • KAWC water meters have an expected useful life of approximately 10 years
11 regardless of testing requirements.⁶
- 12 • Other than communication technology, all other cost and implementation
13 assumptions in KAWC’s CBA were the same when comparing AMI to AMR.⁷
- 14 • KAWC’s use of a 20-year period in its CBA is not unreasonable.⁸

² Holloway Testimony at 3.

³ Holloway Testimony at 3.

⁴ Holloway Testimony at 4.

⁵ Holloway Testimony at 5.

⁶ Holloway Testimony at 7 and 10.

⁷ Holloway Testimony at 11-12.

⁸ Holloway Testimony at 17 and 24.

- 1 • A more rapid deployment of AMI meters compared to KAWC’s plan to replace
2 meters as they reach the end of their useful life would not be favorable because it
3 could result in an early retirement of assets and unfavorable depreciation issues.⁹
- 4 • AMI deployment will create qualitative benefits that are difficult to quantify but are
5 nonetheless useful.¹⁰
- 6 • The correct comparison to be used to compare the cost of AMI to the cost of AMR
7 is that the cost of moving to AMI is just 11 cents per customer per month.¹¹
- 8 • The cost assumptions and meter vendor comparisons in KAWC’s CBA are recent,
9 thorough, and documented and KAWC adequately addressed the Commission’s
10 previous concerns regarding use of outdated pricing for metering equipment.¹²
- 11 • KAWC’s AMI Plan and CBA are reasonable.¹³
- 12 • KAWC’s assumptions of the benefits of AMI are reasonable and, in fact, are likely
13 conservative.¹⁴
- 14 • KAWC’s proposed replacement schedule for water meters is reasonable.¹⁵

⁹ Holloway Testimony at 18.

¹⁰ Holloway Testimony at 19.

¹¹ Holloway Corrected Testimony at 20 and 24; AG October 20, 2025 Responses to Items 1 and 2 of KAWC’s Data Requests to AG.

¹² Holloway Testimony at 21 and 23.

¹³ Holloway Testimony at 20.

¹⁴ Holloway Testimony at 20, 23-24.

¹⁵ Holloway Testimony at 23.

- KAWC's overall assumptions in the CBA comparing AMR and AMI technologies are reasonable and consistent for both technologies.¹⁶

Q. What is your overall assessment of Mr. Holloway's conclusions?

A. I agree with his conclusions. KAWC's AMI Plan is a thorough analysis of which technology is best to accomplish the simple but important task of transmitting usage data from a customer's meter. It can either be AMR technology which transmits data to a nearby KAWC vehicle, or it can be AMI technology which transmits data directly to KAWC via cellular technology without the need for a nearby vehicle. The cost of each is essentially the same with AMI initially costing only 11 cents per customer per month more on average.¹⁷ And this cost does not include the qualitative benefits Mr. Holloway discusses. But, it is also important to note that over a 20-year period, average cost AMI becomes *less* expensive than average cost AMR technology as shown in Figure 21 of the AMI Plan.¹⁸ Thus, AMI is a least cost option for metering technology in the long term.

Q. Do you remain convinced that AMI technology is the best option for KAWC and its customers?

A. Absolutely. Based on KAWC's AMI Plan, the CBA, and Mr. Holloway's testimony, it is clear that deployment of AMI technology utilizing a cellular network is in the long-term best interests of customers. AMI provides significant benefits to customers through improved metering, operational efficiencies, and enhanced customer service while also being a least cost option.

¹⁶ Holloway Testimony at 23.

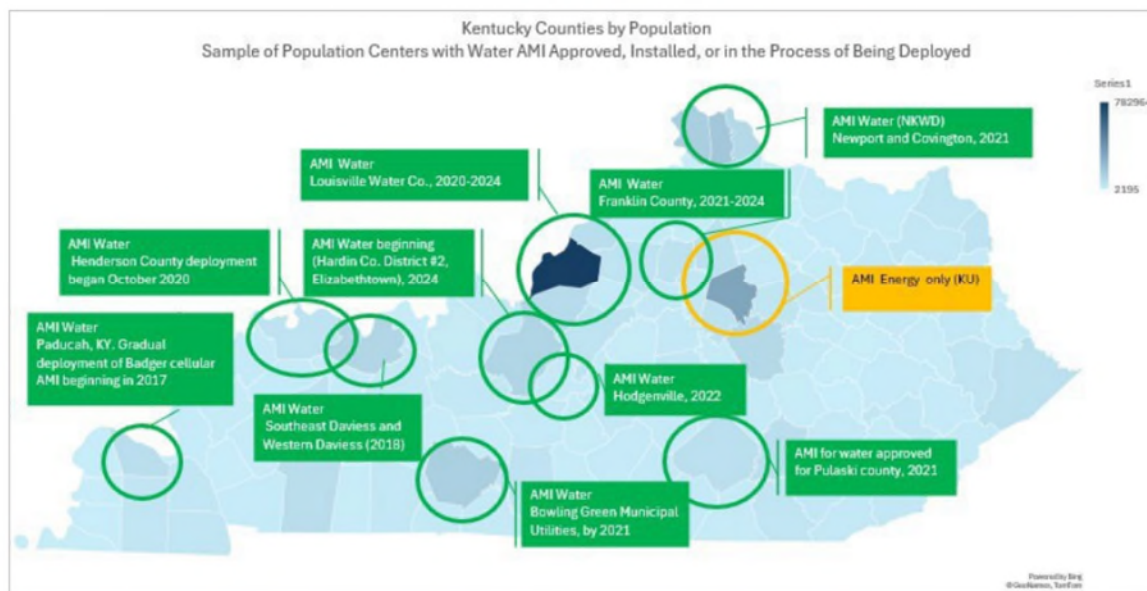
¹⁷ AMI Plan at 30 and at Figure 23 at page 31.

¹⁸ AMI Plan at 29.

1 **Q. Is AMI technology for water already in use in Kentucky?**

2 A. Yes. AMI technology for water use is prevalent in Kentucky for both Commission-
3 regulated water providers and most of the major municipal water providers because it is
4 state of the art proven technology. AMI deployment provides industry best practice
5 customer experience in the present *and* for the future.. KAWC included the map below at
6 page 11 of its AMI Plan showing where AMI is being used or is in the process of being
7 deployed:
8

Figure 11⁹



9
10
11 **Q. What is your recommendation?**

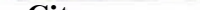
12 My recommendation is the same as I described in my direct testimony. The results of the
13 CBA support the approval of the CPCN. The cost-benefit relationship offered by AMI
14 delivers a solution that is among the least cost of the reasonable alternatives in the long
15 term. And beyond the benefits measured in the CBA, AMI unlocks the potential for a

1 variety of additional customer service, safety, operational, and financial benefits. There is
2 a demonstrated need and there is no wasteful duplication given the end-of-life deployment
3 schedule KAWC has proposed. KAWC has thoroughly investigated available options
4 using updated technology and pricing data. For all of these reasons, my recommendation
5 is that the CPCN be approved.

6 **Q. Does this conclude your rebuttal testimony?**

7 A. Yes.

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF FAYETTE)


Krista Citron

Molly McClesse Van Over
Notary Public

Notary ID: KYNP26988