

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS

The intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention [“OAG”], hereby submits the following Supplemental Data Requests to Kentucky-American Water Co. [“KAW” or “the Company”], to be answered by the date specified in the Commission’s Orders of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The OAG can provide counsel for KAW with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the Companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for OAG.

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

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the Companies have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify Counsel for OAG as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or

otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis 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.

(12) In the event any document called for has been destroyed or transferred beyond the control of the Companies, 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 destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

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Certificate of Service

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record.

This 12th day of September, 2025



Assistant Attorney General

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In Re: Application of Kentucky-American Water Co. for a CPCN for Installation
of Advanced Metering Infrastructure
OAG Supplemental Data Requests
Case No. 2025-00240

1. Reference the response to AG-DR-1-1 (a). If KAW was granted a CPCN to replace all existing meters with AMI as part of system-wide “investment project,” does the Company agree that the use of AFUDC would be appropriate?
2. Reference the responses to AG-DR-1-1 (c), PSC-DR-1-17 (c), and PSC-DR-1-20. Confirm the following expected results from the proposed AMI project: (i) KAW’s labor head count will not decrease; and (ii) KAW envisions that the proposed AMI project will “. . . support higher value work” in its workforce.
3. Explain whether there is any reason not to believe that once the AMI project is completed, KAW’s labor expense will increase. If not confirmed, provide a complete explanation for why not.
4. Reference the response to AG-DR-1-2. Confirm that under the Company’s proposed plan, at year 15 the Company would have to begin a new cycle of replacing AMI meters.
5. Reference the response to AG-DR-1-5. Confirm the following:
 - a. The meter manufacturer / vendor would be the entity providing the head end computer system; and
 - b. The referenced head end computer system would not be physically located in the Commonwealth of Kentucky.
6. Regarding the proposed new composite meter pit lids:
 - a. Provide the estimated lifespan; and
 - b. Explain whether the cost was included in all relevant cost-benefit analyses;
7. Provide an estimate for how many meter pits are dual set, and explain why dual set meter boxes have two meters.
8. Explain whether the Company analyzed the potential impacts, if any, of the proposed CPCN project on Kentucky-American’s waste-water customers, including any impact on bills.
9. Reference spreadsheet provided in response to AG-DR-1-8, KAW_R_AGDR1_NUM008_0829025_Attachment_A_PUBLIC, Tab 0-Inputs, Cells A209 through B222, please provide the following:
 - a. Explain the meaning and required actions referred to in the note in cell A211, when this is necessary, and why AMI results in the service order improvement listed in B211.

In Re: Application of Kentucky-American Water Co. for a CPCN for Installation
of Advanced Metering Infrastructure
OAG Supplemental Data Requests
Case No. 2025-00240

- b. Explain the meaning and required actions referred to in the note in cell A212, when this is necessary, and why AMI results in the service order improvement listed in B212.
- c. Explain the meaning and required actions referred to in the note in cell A213, when this is necessary, and why AMI results in the service order improvement listed in B213.
- d. Explain the meaning and required actions referred to in the note in cell A217, when this is necessary, and why AMI results in the service order improvement listed in B217.
- e. Explain the meaning and required actions referred to in the note in cell A218, when this is necessary, and why AMI results in the service order improvement listed in B218.
- f. Explain the meaning and required actions referred to in the note in cell A219, when this is necessary, and why AMI results in the service order improvement listed in B219.
- g. Explain the meaning and required actions referred to in the note in cell A220, when this is necessary, and why AMI results in the service order improvement listed in B220.
- h. Explain the meaning and required actions referred to in the note in cell A221, when this is necessary, and why AMI results in the service order improvement listed in B221.
- i. Explain the meaning and required actions referred to in the note in cell A222, when this is necessary, and why AMI results in the service order improvement listed in B222.
- j. Explain the meaning and required actions referred to in the note in cell A223, when this is necessary, and why AMI results in the service order improvement listed in B223.
- k. Explain the meaning and required actions referred to in the note in cell A224, when this is necessary, and why AMI results in the service order improvement listed in B224.
- l. Explain the meaning and required actions referred to in the note in cell A215 and A216, when each is necessary, the difference between the two, and why AMI results in different service order improvements for B215 and B216.

10. Reference the spreadsheet provided in response to AG-DR-1-8, KAW_R_AGDR1_NUM008_0829025_Attachment_A_PUBLIC, Tab ServOrderOpp-AMI, please provide the following information:

- a. Explain the difference between values in cells B11 through B58 and cells C11 through C58.
- b. Explain why the formulas used in cells G11 through G58 and I11 through I58 reference the cells in B11 through B58, respectively, and not the cells in C11 through C58.

In Re: Application of Kentucky-American Water Co. for a CPCN for Installation
of Advanced Metering Infrastructure
OAG Supplemental Data Requests
Case No. 2025-00240

11. Reference the spreadsheet provided in response to AG-DR-1-8, KAW_R_AGDR1_NUM008_0829025_Attachment_A_CONFIDENTIAL, Tab Comp3-CustDetail, please explain why [REDACTED] in cell D27.
12. The response provided to OAG-DR-1-27 did not address the question. Please explain why KAW did not perform a cost benefit analysis on replacement of all meters with AMI on an expedited basis.
13. Referring to the response provided to OAG-DR-1-28, has KAW calculated the efficiency gains by grouping LOS geographically? If not, can an estimate be provided?
14. Refer to the response to OAG-DR-1-34 (b) where KAW states that on demand reads can affect endpoint battery life and the response to OAG-DR-1-25 where KAW states that “pinging” the endpoint does not affect battery life. Please explain the fact that these responses directly conflict with each other.
15. Refer to the response to OAG-DR-1-35. Has KAW calculated the number of meters that will not have cell service access if AMI were implemented? What is the plan for reading these meters if AMI were to be implemented?
16. Recently KAW announced a large water main improvement project in Lexington, KY (see <https://www.lanereport.com/183460/2025/09/kentucky-american-water-to-improve-4-8-million-in-water-main-projects/>). Please provide the following information:
 - a. Will this require replacement of customer meters before the expected 10-year life?
 - b. If so, how many, what kind, and has this been accounted for in KAW’s cost benefit analysis for both AMR and AMI?
 - c. Assuming the Commission grants KAW’s request to move to AMI, will these replaced meters be AMI enabled as part of this project?
 - d. Will this work be performed by KAW personnel or contractors?
 - e. If the work is performed by contractors, please describe how KAW manages the project.
17. Referring to the response to PSC-DR-1-9, please provide the units used for UFW.
18. Referring to the response to PSC-DR-1-14 (b), please explain the statement involving the difference from 47% to 13%. Was this actual UFW or was it the difference between taking monthly AMR “snapshot” readings at different times for customer meters and comparing that to district area metering? Please explain fully and provide data used for this comparison.

In Re: Application of Kentucky-American Water Co. for a CPCN for Installation
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OAG Supplemental Data Requests
Case No. 2025-00240

19. Referring to the response to PSC-DR-1-17 (a), should
“KAW_R_PSCDR1_NUM026_082925” be
“KAW_R_PSCDR1_NUM027_082925” ? If not, please provide
KAW_R_PSCDR1_NUM026_082925.
20. Referring to the response to PSC-DR-1-18 (a), please explain how KAW will use
“third-party services for the installation of meters.”
- a. Is this the current practice for meter replacement?
 - b. How are these service providers currently selected and how is their work
overseen and managed?
 - c. Will this practice change if conversion is made to AMI?
 - d. How are these third-party service providers selected and utilized? Please
provide current contracts and agreements for these services.
 - e. Will changing to AMI from AMR affect the utilization of third-party service
providers or KAWC oversight of these providers?
21. Regarding planned large capital projects KAW has over the same 20-year period used
in the cost benefit analysis comparing AMR and AMI, please provide the following:
- a. List and describe each project, the timeline and the estimated cost.
 - b. Indicate on each project if it is believed that the project will involve
removing and replacing customer meters that are less than 10 years old.
Indicate the number of customer meters involved in the project and the
average remaining life of these meters.
 - c. Are these projects already incorporated in the cost benefit analysis? If so
indicate where. If not, explain.