

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 RESPONSES TO DATA REQUESTS OF
KENTUCKY-AMERICAN WATER COMPANY**

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention [“OAG”], hereby submits his Responses to Kentucky-American Water Company’s (“KAW” or “the Company”) Data Requests in the above-styled matter.

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



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Certificate of Service and Filing

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. Counsel further certifies that the responses set forth herein are true and accurate to the best of their knowledge, information, and belief formed after a reasonable inquiry.

This 20th day of October, 2025



Assistant Attorney General

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

WITNESS / RESPONDENT RESPONSIBLE:
LARRY W. HOLLOWAY

QUESTION No. 1
Page 1 of 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.

RESPONSE:

Confirmed.

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

WITNESS / RESPONDENT RESPONSIBLE:
LARRY W. HOLLOWAY

QUESTION No. 2
Page 1 of 1

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.

RESPONSE:

Confirmed.

COMMONWEALTH OF KENTUCKY
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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)

AFFIDAVIT OF LARRY HOLLOWAY, P.E.

State of Kansas)
)
)

Larry Holloway, being first duly sworn, states the following:
The Responses to Data Requests attached hereto constitute the Affiant's sworn testimony in the above-styled case. Affiant states that he would give the answers set forth in the Responses if asked the questions propounded therein. Affiant further states that, to the best of his knowledge, information and belief his statements made are true and correct. Further affiant saith naught.


Larry Holloway

SUBSCRIBED AND SWORN to before me this 17 day of October, 2025


NOTARY PUBLIC

My Commission Expires: 5-6-2029

