COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic APPLICATION OF KENTUCKY-AMERICAN WATER COMPANY FOR AN ADJUSTMENT OF RATES, APPROVAL OF SYSTEM IMPROVEMENT PROGRAM, AND TARIFF CHANGES	)))))	Case No. 2026-00094

Georgetown Municipal Water and Sewer Service
Request for Information to Kentucky American Water Company

Georgetown Municipal Water and Sewer Service ("GMWSS") herewith submits its Request for Information to Kentucky-American Water Company ("KAWC"). See attached Requests ## 1-14. KAWC should provide GMWSS with its responses on or before July 30, 2026, in accordance with the 5/27/26 scheduling Order. In responding to these requests, KAWC should follow the general instructions given in Staff data requests, *e.g.*, the 6/10/26 Commission Staff's Second Request for Information to Kentucky-American Water Company pp.1-2. If KAWC has questions about the scope, nature, or other specifics of the information requested, please contact the undersigned counsel for clarification or possible narrowing/modification of the request.

Respectfully submitted,

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ATTORNEYS FOR GMWSS

1. Please refer to Direct Testimony Exhibit AEB-9 (p.1):

   a. Are the common equity ratios shown for Atmos Energy Corporation in Exh. AEB-9 (p.1) unreasonably high? If the answer is other than an unqualified "yes" as to each of the years 2022-2024 and the 3-year average, for each ratio KAWC (or the witness) contends is not unreasonably high, please state the basis for that contention.

   b. Provide the median common equity ratio for the Proxy Group for each of the years shown and for the 3-year average.

2. Please refer to the William A. Lewis testimony about the now-approved KAWC acquisition of the Black Mountain Utility District (*see* PSC Case No. 2026-00097, 7/10/26 Final Order):

   a. Are costs associated with the Black Mountain Utility District included in the rates for Sales for Resale proposed in this case?

   b. If so, why should costs associated with such a to-be-acquired, non-contiguous system be recovered from Sales for Resale customers?

   c. Are the Black Mountain Utility District assets to be acquired by KAWC included in the KAWC rate base projected in this case? If so, please state the valuation and provide support for that valuation.

3. Please refer to the table of Historical NRW and UFW, at pp. 34-35 of the William A. Lewis testimony, and provide the calculations and supporting documentation for the 2019–2025 data tabulated therein. If the supporting documentation includes or consists of reports filed with the PSC, *e.g.*, annual water-loss reports, please nonetheless produce copies of those reports.

4. Please refer to the William A. Lewis testimony at pp. 36-38:

   a. How do the benefits of fire protection within any single local government's area "extend to the entire communities that we serve"? Describe how public fire protection in a single locality "enhances public safety, supports economic development, and reduces the risk for all customers within the Company's service territory." Be specific and concrete about the benefits you claim extend, *e.g.*, to KAWC customers in Lexington-Fayette County from public fire service in the locale of Clinton, Warsaw, or Middlesboro, Kentucky (or vice-versa). Provide the justification for socializing one local government's choices about number, placement, and use of fire hydrants to all other KAWC customers.

b. Explain the contention that the hydrant fees in KAWC's current tariff pose a barrier to (or discourage) regionalization and investment in infrastructure and describe how the current fees have that negative effect.

c. Provide the respective statement(s) supporting the assertion, "Regionalization is a stated goal of the Kentucky legislature, the KYPSC and the KYDOW."

5. Does KAWC support regionalization by providing wholesale water to surrounding distribution systems? If not, why not?

6. Does KAWC contend that increasing its Sales for Resale rate supports or encourages regionalization? If so, explain that contention and provide the empirical support (if any) for it.

7. Please refer to the Charles Rea testimony at p.38 *ll.*7-9:

a. Identify each of the "two customers on contract rates," provide a copy of each respective contract and applicable amendments thereto, and state what the respective customer's service classification and applicable tariff rate(s) would be if the customer were not on contract rates.

b. State whether there was any change to either or both contract rates that was proposed/requested in last year's KAWC rate case (No. 2025-00122) and the change (if any) that was ordered in or resulted from the 12/16/26 Final Order in that case.

c. List (for each customer) the total usage volume and revenues therefrom included in (i) the base period and (ii) the test year.

d. Explain why there is no change proposed to either of the two customer's rates as a result of any revenue increase granted in this case.

8. Please refer to the table of wholesale rates "of some water utilities in Kentucky" in KAWC's 6/26/26 Response to 2 PSC 19 (KAW_R_PSCDR2_NUM019_062626):

a. Is KAWC aware of any water utility in Kentucky charging a wholesale rate higher than, equal to, or nearly equivalent to (i) the KAWC price of $0.83091 per 100 gallons or (ii) the KAWC proposed price of $0.87371 per 100 gallons? If so, identify each such utility and the respective wholesale rate.

b. Identify the customer(s) on the "KAWC – Contract Wholesale" rate of $0.22500 per 100 gallons, provide a copy of each respective contract and applicable amendments thereto, and state what the respective customer's service classification and applicable tariff rate(s) would be if the customer were not on contract rates.

9. Please refer to KAWC's 2024 Annual Report to the PSC at p.62, a table of Sales for Resale. Provide a table of the same information for Sales for Resale in calendar year 2025.

10. Please confirm that KAWC's Sales for Resale service is completely interruptible. If you contend that tariffed Sales for Resale service has any limitation on interruptibility, list each such limitation and the reason therefor, and compare the interruptibility of Sales for Resale service customers with that of other customers on KAWC's Service Classification No.1 (Tariff P.S.C. KY No. 11, 1st Rev'd Sheet No. 29).

11. Please refer to KAWC's Application Exh. 2 proposing to reduce the rate for Bulk Sales of Water through Loading Stations (P.S.C. KY No. 12, Orig. Sheet No. 43), to $0.23694 per 50 gallons (equivalent to $4.47387 per 1000 gallons). State the justification for proposing to:

a. reduce the rate for Bulk Sales service (while increasing the rates for Sales for Resale and most other customers for Service Classification No. 1); and

b. charge $3.9984 more per 1000 gallons ($8.7371 - $4.7387) plus a monthly service charge (*e.g.,* $1079.40 for a 6" meter; $1727.10 for an 8" meter) for Sales for Resale service.

12. Please state when KAWC became aware of GMWSS's usage of more than 51 million gallons at the Champion Way service point from 2/19/26 through 3/18/26, and explain how it was unaware of that usage and/or did not bill for such usage for so long and why it invoiced on estimated usage for the service period from 2/4/26 through 5/19/26. Provide any supporting documentation.

13. With respect to the meter reads for KAWC service to GMWSS at the Champion Way location, please state:

    a. the date of the latest meter read for service GMWSS at Champion Way and whether that read was on-site or digital/remote and, if digital/remote, the date of the latest on-site read of the service meter at that location;

    b. the date of the first on-site read of the service meter at that location after 3/18/26;

    c. what the last meter read shows to be the actual usage for GMWSS since the 9/1/25 start of the base period; and

    d. how much of that actual usage is included in the 9/1/25–2/28/26 actual historical data and in the 9/1/25–8/31/26 base period used in KAWC's 5/15/26 Application.

14. Please refer to the Champion Way 2026 invoices attached by KAWC as Confidential Exh.B to its 6/9/26 Response to GMWSS's Motion to Intervene:

    a. Confirm that the KAWC invoices with bill dates 2/20/26, 4/13/26, 4/28/26, and 5/28/26 (covering service period from 2/4/26 through 5/19/26) were based on estimated, rather than actual usage.

    b. How frequent is it that a customer account (like the GMWSS account at the Champion Way service address) will be estimated for more than four (4) bill dates or service period months in a row? For the 14-month period encompassing calendar year 2025 and January-February 2026 (or the latest such period of at least 14 months for which data are available), provide frequency distribution statistics for estimated usage bills and the frequency distribution of accounts with 3, 4, 5, and ≥6 estimated bills in a row. Describe the set of accounts used for the statistics, including the total number of accounts and of bills (or bill dates or bill periods) and whether the accounts set excluded residential service or budget -billing accounts.

    c. Identify regulations and state or provide KAWC tariff provisions, internal guidelines, and rules that limit reliance on estimated usage in billing customers or affirmatively require actual usage billing.