Steven L. Beshear Governor

Leonard K. Peters Secretary Energy and Environment Cabinet



Commonwealth of Kentucky **Public Service Commission**

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James W. Gardner Vice Chairman

Charles R. Borders Commissioner

December 13, 2010

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Utility and Rate Intervention Division

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Iris G Skidmore, Esq. 415 West Main Street, Suite 2 Frankfort, Kentucky 40601

Re: Case No. 2010-00036

Kentucky-American Water Company

Ladies and Gentlemen:

The enclosed electronic mail message and its attachment have been placed in the record of the above-referenced case.

Sincerely,

Jeff Derouen

Executive Director

gw Enclosure



Wuetcher, Jerry (PSC)

From: Ingram III, Lindsey [L.Ingram@skofirm.com]

Sent: Wednesday, September 15, 2010 14:39

To: Wuetcher, Jerry (PSC)

Cc: Spenard, David (KYOAG); Howard, Dennis (KYOAG); dbarberi@lfucg.com; batesandskidmore@gmail.com;

Osterloh, Todd (PSC); Frost, Mark C (PSC); Reid, Sam H (PSC); Beavers, Eddie (PSC); Rice, James D (PSC);

Robards, Bob (PSC); Ibowman@Ifucg.com; Louise.Magee@amwater.com; Kash, Heather (KYOAG);

Mike.Miller@amwater.com; Sheila.Miller@amwater.com; Gerald.Reynolds@amwater.com

Subject: RE: Case No. 2010-00036: PSC Staff Request for Clarification

Attachments: Summary of revisions.xls

Jerry:

You are correct about the deferred compensation adjustment to rate base. The attached has been revised to make that correction. Per our discussion regarding procedure for getting this information into the record, the Commission will take care of it so it is my understanding that I do not need to e-file this. Please let me know if that changes.

Lindsey

From: Wuetcher, Jerry (PSC) [mailto:JWuetcher@ky.gov]

Sent: Wednesday, September 15, 2010 10:11 AM

To: Ingram III, Lindsey

Cc: Spenard, David (KYOAG); Howard, Dennis (KYOAG); dbarberi@lfucq.com;

batesandskidmore@gmail.com; Osterloh, Todd (PSC); Frost, Mark C (PSC); Reid, Sam H (PSC); Beavers,

Eddie (PSC); Rice, James D (PSC); Robards, Bob (PSC); Ibowman@Ifucg.com; Louise.Magee@amwater.com; Kash, Heather (KYOAG); Mike.Miller@amwater.com;

Sheila.Miller@amwater.com; Gerald.Reynolds@amwater.com

Subject: RE: Case No. 2010-00036: PSC Staff Request for Clarification

Lindsey:

The format is acceptable to PSC Staff. PSC Staff noted a circular reference in the copy of the file that we opened. (This problem may be related to the version of Excel that the PSC uses. The PSC's computers are equipped with Excel 2003.) PSC Staff suggests that KAWC review Deferred Compensation adjustment to rate base to ensure its accuracy. Should the adjustment increase or decrease rate base?

Gerald E. Wuetcher
Executive Advisor
Public Service Commission of Kentucky
(502) 564-3940, Extension 259
(502) 229-6500 (cell)
gerald.wuetcher@ky.gov

From: Ingram III, Lindsey [mailto:L.Ingram@skofirm.com]

Sent: Tuesday, September 14, 2010 16:57

To: Wuetcher, Jerry (PSC)

Cc: Spenard, David (KYOAG); Howard, Dennis (KYOAG); dbarberi@lfucg.com;

batesandskidmore@gmail.com; Osterloh, Todd (PSC); Frost, Mark C (PSC); Reid, Sam H (PSC); Beavers,

Eddie (PSC); Rice, James D (PSC); Robards, Bob (PSC); Ibowman@lfucg.com; Louise.Magee@amwater.com; Kash, Heather (KYOAG); Mike.Miller@amwater.com;

Sheila.Miller@amwater.com; Gerald.Reynolds@amwater.com

Subject: RE: Case No. 2010-00036: PSC Staff Request for Clarification

Jerry:

We have prepared the attached Excel spreadsheet in an effort to provide the requested information. I plan on e-filing this in the case, but I want to make sure that it provides the requested information and that it does so in a format acceptable to Commission Staff. I am not sure if it shows on your end, but the suggested format you provided below gets a little garbled when I view it (maybe because I use Outlook and you use a different e-mail program?). Regardless, if the attached is what the Commission Staff needs, please let me know and I will file it right away. If it is not, please let us know how it needs to be revised and we will do so.

Lindsey W. Ingram III Stoll Keenon Ogden PLLC 300 W. Vine St. Suite 2100 Lexington, KY 40507 859-231-3982 (direct dial) 859-221-0997 (cell) 859-246-3672 (direct fax) Lingram@skofirm.com

From: Wuetcher, Jerry (PSC) [mailto:JWuetcher@ky.gov]

Sent: Monday, September 13, 2010 5:18 AM

To: Ingram III, Lindsey

Cc: Spenard, David (KYOAG); Howard, Dennis (KYOAG); dbarberi@lfucg.com; batesandskidmore@gmail.com; Osterloh, Todd

(PSC); Frost, Mark C (PSC); Reid, Sam H (PSC); Beavers, Eddie (PSC); Rice, James D (PSC); Robards, Bob (PSC);

lbowman@lfucg.com; Louise.Magee@amwater.com; Kash, Heather (KYOAG)

Subject: Case No. 2010-00036: PSC Staff Request for Clarification

Mr. Ingram:

On July 15, 2010, Kentucky-American Water Company (KAWC) submitted its base period updates. This submission included a schedule that lists KAWC's various revisions to its forecasted revenue requirement. A copy of this schedule is attached. Commission Staff requests that NLT 17 September 2010 KAWC provide for each revision listed in the attached schedule the revision's effect on KAWC's forecasted rate base, operating revenues, operating expenses, and capital accounts. An example of the suggested format for KAWC's response appears below:

Slippage: Rate Base Utility Plant in Service \$Adjustment

Accumulated Depreciation \$Adjustment
Deferred Income Tax \$Adjustment
Operating Revenues AFUDC \$Adjustment

If KAWC has questions regarding this request, please submit them by e-mail and copy the parties to Case No. 2010-00036. A copy of this message will be place in the record of Case No. 2010-00036.

Commission Staff appreciates KAWC's efforts in timely responding to this request.

Sincerely,

Gerald E. Wuetcher
Executive Advisor
Public Service Commission of Kentucky
(502) 564-3940, Extension 259
(502) 229-6500 (cell)
gerald.wuetcher@ky.gov

<<Pages from KAW_SAPP_EX37_071510.pdf>>

Kentucky American Water Company Summary of revisions

Summary of revisions				
	Rate base	Operating Revenues	Operating Expenses	Capital Accounts
Slippage:				
Utility Plant in Service	3,040,339			
Accumulated depreciation	(62,956)			
CWIP	(25,443)			
Working Capital	1,000			
CIAC's	(916,100)			
CAC's	(792,057)			
Accumulated Deferred IT	1,474			
	1,246,257			
AFUDC		(17,066)		
Property tax expense			18,132	
Depreciation expense			60,553	
SIT current			4,007	
SIT deferred			144	
FIT current			21,968	
FIT deferred			755	A 186
CT dobt				Avg Wt cost
ST debt				1,249,182 0.01%
LT debt				(1,558) -0.01%
Preferred stock				(52) 0.00%
Common equity				(1,315) -0.02%
				-0.02%
Reduced Pensions:				
pension expense			(253,262)	
SIT current			15,246	
FIT current			83,606	
Working capital	(25,000)		03,000	
Working capital	(23,000)			
Reduced OPEB's:				
OPEB expense			(52,215)	
SIT current			3,147	
FIT current			17,256	
Working capital	(7,000)			
Reduced management fees:				
Management fees expense			(132,950)	
SIT current			8,010	
FIT current			43,919	
Working capital	(16,000)		.0,0.0	
Tromany supra.	(10,000)			
Adj rate case expense - 2 months amortization:				
Regulatory expense amortization			24,866	
SIT current			(1,498)	
FIT current	0.000		(8,214)	
working capital	3,000			
Adj working capital for AIP lag days:				
Majority of this difference is due to the net operating				
funds total on Sch B5.2 did not originally include				
the payroll totals in the dollar days column.				
Working Capital	(458,883)			

Kentucky American Water Company Summary of revisions

Summary of revisions					
	Rate base	Operating Revenues	Operating Expenses	Capital Accounts	
Accumulated Deferred IT	117				
Result of chg in equity grossup due to					
adj to working cap and slight change in capital					
structure between short term debt - adj for slippage					
SIT current			3,139		
FIT current			17,219	(450.050)	0.040/
ST debt				(459,956)	-0.01%
LT debt				571	0
Preferred stock				18 484	0 019/
Common equity				404	0.01% 0.00%
					0.00%
Other Rate Base - deferred compensation:					
Working capital	(3,000)				
Accumulated deferred IT	(24)				
Other rate base items	188,379 [°]				
SIT current	,		(410)		
FIT current			(2,251)		
AFUDC		(304)	, ,		
ST debt		, ,		185,788	0
LT debt				(234)	0
Preferred stock				-	0
Common equity				(190)	-0.01%
					-0.01%
Eliminate Inniliate UDAA Dannahan					
Eliminate duplicate UPAA - Boonesboro:	(0.040)				
Utility Plant Acquisition Adjustment SIT current	(2,342)		_		
FIT current			5 26		
i ii cuitetii			20		
A III					
Adj insurance other than group to 2010 premiums:			(47.004)		
Insurance other than group	(0,000)		(47,931)		
Working capital SIT current	(9,000)		2,894		
FIT current			15,870		
TH Current			13,070		
Adj labor & mgmt fees - move Braxton, Shryock, and	a Sione to SC:		(040.004)		
Kentucky labor			(240,001)		
Management Fees Pensions			370,765		
OPEB's			(31,462)		
Group Insurance			(26,620) (42,360)		
Worker's compensation			(804)		
Payroll Taxes			(20,468)		
401K			(3,995)		
DCP			(846)		
Retiree Medical			(61)		
Incentive			(13,766)		
Working Capital	23,000		,,		
SIT current	,		584		
FIT current			3,197		

Adj Tax exempt financing bond rate from 5.625% to 5.375%:

Kentucky American Water Company Summary of revisions

Working Capital Accumulated Deferred IT SIT current SIT deferred FIT current FIT deferred AFUDC	Rate base 11,000 188	Operating Revenues (653)	4,339 (20) 23,796 (107)	Capital Accounts	
ST debt LT debt Preferred stock Common equity Interest on LTD			(113,077)	(11,214) 9 9 9	Avg Wt cost 0 -0.02% 0 0 -0.02%
Adj depreciation rates to include KRS II: Accumulated depreciation Working Capital Accumulated deferred IT Depreciation expense Property Taxes SIT current SIT deferred FIT current FIT deferred	130,773 (12,000) (73,262)		(262,146) 444 (118) 23,142 (649) 126,904		