

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

WILLIAM ELLIS BOLLINGER III)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2019-00016
)	
KENTUCKY-AMERICAN WATER COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO KENTUCKY-AMERICAN WATER COMPANY

Kentucky-American Water Company (Kentucky-American) pursuant to 807 KAR 5:001, is to file with the Commission an original and seven copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the entry of this request for information. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the individual responsible for responding to questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the 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.

Kentucky-American shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky-American fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky-American shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Kentucky-American's response to Commission Staff's First Request for Information, Item 2(c). Provide an updated chart that includes information from November 2017 to the present date. If an estimate was generated for a specific month, then provide the estimated amount as well as the actual amount of water usage in gallons.

2. Provide a detailed explanation of the technical capabilities of Mr. Bollinger's old meter that was replaced on August 16, 2018. Be sure to explain whether the old meter was capable of capturing exact monthly water usage.

3. Refer to Kentucky-American's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1. Also, refer to 807 KAR 5:006, Section 7(5)(a), which states that each utility shall read customer meters at least quarterly, except if prevented by reasons beyond its control. Commission regulation 807 KAR 5:006, Section 7(5)(d), states that if due to reasons beyond its control, a utility is unable to read a meter, the utility shall record the date and time the attempt was made, if applicable, and the reason the utility was unable to read the meter.

a. Confirm that Kentucky-American violated 807 KAR 5:006, Section 7(5)(a), by not conducting actual reads of the Complainants' meter at least quarterly. If this is not confirmed, explain the answer in full detail.

b. Confirm that Kentucky-American violated 807 KAR 5:006, Section (5)(d), by not recording specific reasons for each time that Kentucky-American attempted to perform actual reads on the Complainant's meter. For example, Kentucky-American states, "[o]ffice estimate, no read or skip code was obtained in the field so the meter was estimated in the office" as a reason that Kentucky-American did not perform an actual read of Mr. Bollinger's meter on January 23, 2018, and March 20, 2018. If this is not confirmed, explain the answer in full detail.

c. Explain in full detail what is meant by "[b]roken reading device skip code was entered by field employee," which was noted for meter reading dates February 20, 2018, April 19, 2018, June 19, 2018, and July 18, 2018.

d. Explain in full detail what is meant by “[m]anual read entered was out of line with previous meter readings,” which was noted for meter reading date August 20, 2018.

e. Provide a replication of the chart contained in this response, and include the information from November 17, 2017, until present date.

4. Refer to Kentucky-American’s response to Staff’s Second Request, Item 2.

a. Kentucky-American states that if actual usage data is not transmitted, then Kentucky-American’s billing system generates and sends a bill based on estimated usage. Explain in detail how the billing system calculates an estimated usage.

b. Kentucky-American states that if actual usage data is not transmitted, then Kentucky-American creates a service order to inspect the equipment for proper operation. Explain whether this occurs after the first estimated usage read, and if so, why was Mr. Bollinger’s meter not inspected for proper operation after the first estimated read.

c. Kentucky-American states that if continued estimated data is observed, then Kentucky-American generates a service order in an attempt to identify why actual data is not being delivered. Explain at what point this normally occurs in the process. Further, explain why Kentucky-American did not attempt to identify why actual data was not being delivered by Mr. Bollinger’s meter from January 23, 2018, through August 20, 2018.

d. Kentucky-American notes that on February 22, 2018, a service order to repair Mr. Bollinger’s reading device was created, and it auto expired due to not being

worked within the allotted time frame. Explain why a service order would ever auto expire, and not be renewed in the system.

e. Kentucky-American notes that on April 11, 2018, a service order to stop the estimates was not completed because the meter pit needed to be located. Explain in full detail what is meant by this statement.

f. Explain in specific detail why Kentucky-American was unable to obtain actual reads of Mr. Bollinger's meter, and instead estimated the reads between January 23, 2018, and August 20, 2018. If Kentucky-American performed an investigation into this issue, provide a copy of the same.

g. Explain whether Kentucky-American has implemented new policies and procedures to prevent Kentucky-American from generating estimated usage for long periods, instead of properly conducting an actual read of the water meter. If not, explain why not.

5. Explain whether Kentucky-American has offered a payment plan to Mr. Bollinger commensurate in time with the amount of months that it estimated usage instead of obtaining actual water usage.

6. State whether Kentucky-American was ever notified of a leak at Mr. Bollinger's premises.


Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED FEB 28 2020

cc: Parties of Record

William Ellis Bollinger III
5875 Paris Pike Road
Georgetown, KENTUCKY 40324

*Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Kentucky-American Water Company
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801