

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

EARL D. ISON, JR AND BRENDA C. ISON	)	
	)	
COMPLAINANTS	)	
	)	
V.	)	CASE NO.
	)	2019-00093
KENTUCKY-AMERICAN WATER COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S SECOND 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 the original and four copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the 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 Kentucky-American 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, Kentucky-American 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 Complainant's Complaint (Response) in which Kentucky-American states that the disputed amount is \$147.51, as shown on the attached bill dated February 22, 2019. Kentucky-American also states in its Response that "[s]ince KAW's investigation of this matter, billings based on the problematic radio equipment were cancelled, **all billings have been based on the actual usage** taken from both the old and new meters . . . ." (emphasis added).<sup>1</sup> If Kentucky-American is claiming the disputed amount on the February 27, 2019 bill is taken from actual usage of both the old meter and the new meter installed on February 7, 2019,

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<sup>1</sup> Kentucky-American Water Company's Response to Complainant's Complaint at 2.

explain why the Billed Usage History Graph on page three of the February 22, 2019 bill shows the amount of usage for February 2019 as an estimate, which would be the usage for the bill in question. Also, explain why the Billed Usage History Graph for March 26, 2019, and May 9, 2019, provided by Kentucky-American in its Response, continue to show this elevated February 2019 usage as an estimate.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED           OCT 10 2019          

cc: Parties of Record

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