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March 25, 2020

**VIA E-MAIL ONLY**

Kent Chandler  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd  
Frankfort, KY 40601

*Re: Bent Tree v. KAW, Case No. 2019-00133*

Dear Mr. Chandler:

Enclosed please find Kentucky-American Water Company's Responses to Bent Tree's First Request for Information in the above-referenced matter.

Very truly yours,

Lindsey W. Ingram III

Enclosure

cc: Dennis G. Howard

**RECEIVED**

**MAR 26 2020**

AH

**PUBLIC SERVICE  
COMMISSION**

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

1. The KAWC February 27, 2018 meter flow report does not indicate which meter was tested. (See Bent Tree Response to PSC Staff, DR-2, page A-2.) What is the meter number of the tested meter?

**Response:**

The KAWC February 27, 2018 meter flow report is referencing meter number 60670947.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

2. Please confirm the questions Mr. Marquette asked in his email dated March 5, 2018, to KAWC were never answered by the Company. (See Bent Tree Response to PSC Staff, DR-2, pages A-1 through A-15.)

**Response:**

KAWC has no written record of responding to those questions.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

3. Please confirm another new meter, number 83113560, was installed at the Kirklevington location later in February 2018.
- a. Why was this done?
  - b. What functional capabilities did this meter have different than the prior one at the location? For example, could it read hourly?
  - c. If there were any different functional capabilities, were they conveyed by KAWC to Mr. Marquette?

**Response:**

- a. Meter number 83113560 was installed at the Kirklevington location on February 6, 2018. This was done in order to have the ability to provide an hourly usage report.
- b. This meter has the capability to provide an hourly usage report, whereas the prior meter did not.
- c. The different functional capabilities were conveyed by KAWC to Mr. Marquette over the phone.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

4. Please confirm that Mr. Marquette, on behalf of Bent Tree, made its first appeals for help to KAWC in October 2017. If confirmed, please explain why KAWC did not respond at that time.
  - a. What is the date and time of Mr. Marquette's signature on the KAWC lobby registration at the time of his first visit to KAWC on Richmond Road?

**Response:**

KAWC is not able to confirm that the first inquiry occurred exactly in October 2017, however KAWC does not dispute that Mr. Marquette contacted KAWC in October or November of 2017.

- a. KAWC does not have a record of Mr. Marquette's signature on the lobby registration. KAWC does not record every individual that enters the lobby.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

5. Please confirm that KAWC did not respond to Mr. Marquette for four weeks after his visit to KAWC in October 2017.

**Response:**

Please see the response to BT 1-4. KAWC has no written record of communicating with Mr. Marquette in October 2017 and does not dispute that there was no communication with him for a four-week period in or about October 2017. KAWC can confirm that he was in the KAW offices on November 27, 2017 and KAW communicated with him on November 29, 2017.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

6. Please confirm that Mr. Marquette, on behalf of Bent Tree, contacted KAWC again on November 27, 2017, after hearing no response since October, with an appeal for assistance, including a request that KAWC holds put on bills.
  - a. Please confirm that KAWC stated it would test the meter but no date was given to Mr. Marquette.
  - b. What is the date and time of Mr. Marquette's signature on the KAWC lobby registration at the time of this visit?

**Response:**

KAWC confirms that Mr. Marquette was in KAWC offices on November 27, 2017 and that there was a subsequent communication between him and KAW on November 29, 2017.

- a. KAWC confirms that a meter test was discussed with Mr. Marquette on November 29, 2017.
- b. KAWC does not have a record of Mr. Marquette's signature on the lobby registration for any date in November 2017. KAWC does not record every individual that enters the lobby. However, KAWC agrees that he was in KAWC's offices on November 27, 2017 and that there was communication between him and KAWC about meters on November 29, 2017.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

7. Please confirm that Mr. Marquette did not receive a response from KAWC for another three weeks, specifically from November 29 until December 14, 2017.

**Response:**

KAWC does not have a record indicating communication between KAWC and Mr. Marquette between November 29, 2017 and December 14, 2017.



**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

- 8.** Please confirm that Mr. Marquette contacted KAWC again on December 14, 2017, asking about meter testing and was told KAWC had until Dec 29, 2017 to test the meters.

**Response:**

KAWC confirms that Mr. Marquette contacted KAWC on December 14, 2017 asking about meter testing and was informed of the ongoing internal investigation by KAWC. The hold on the account was extended until December 29, 2017 which was not a scheduled test date for the meter. This investigation led to meter number 060670947N being tested and the meter passed the test.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

9. Please confirm KAWC did not contact Mr. Marquette again for seven and half weeks, specifically from December 14, 2017 until February 6, 2018.

**Response:**

KAWC has no record of initiating communications to Mr. Marquette during that time period but states that he called the call center for KAWC on December 14, 2017 and December 28, 2017 to discuss the situation and those discussions included meter testing, KAWC's investigation of the problem (noted as "pending bpem") and keeping the account on hold. See Bent Tree's July 8, 2019 Response to Commission Staff's First Information Request, Item 1, Bates numbers 225-226. Copies of those two pages are attached.

				Note 02/01/2018 06:58:19 BROOKSBR  ***BBJ/ART - Scheduled to have meter tested - Will contact customer as a meter test results become available.*** Svc Order 000512849129 of type Test Meter_Customer Request was created on 02/01/2018
2/1/2018	Backoffice Research	Svc Order Meter Work Order-CMT	Closed	
				Note 12/28/2017 13:00:02 THOMPSJ2  INBOUND SPOKE WITH - John Marquette - Mgr./board pres. PHONE -859-421-6511
				ISSUE - John (board president) called to follow up on meter test. Informed of pending bpem. Extended lock. RESOLUTION - He will callback after the 1st of the year. Lock of type Dunning reason Bill Inquiry/Dispute valid 12/28/2017 - 02/27/2018 for Contract Account [REDACTED] created
12/28/2017	Telephone Call	Billing Billing Follow Up Inquiry	Closed	Added lock Dunning from 12/28/2017 to 02/27/2018
12/28/2017	Telephone Call	IVR Account Balance Inquiry	Closed	No Notes on File

				<p>Note</p> <p>12/14/2017 10:32:03 BREWSTT1</p> <p>John (board president) called to follow up on meter test. Informed of pending bpem. Extended lock.</p> <p>Lock of type Dunning reason Bill Inquiry/Dispute valid 12/28/2017 - 12/29/2017 for Contract Account [REDACTED] created</p> <p>Added lock Dunning from 12/28/2017 to 12/29/2017</p> <p>Lock of type Calculate Interest reason Late Payment Charge Lock valid 12/28/2017 - 12/29/2017 for Contract Account [REDACTED] created</p> <p>Added lock Calculate Interest from 12/28/2017 to 12/29/2017</p>
12/14/2017	Telephone Call	Other Issues Follow-up	Closed	
12/14/2017	Telephone Call	IVR Account Balance Inquiry	Closed	No Notes on File
				<p>Note</p> <p>11/29/2017 13:03:51 ROBERTP1</p> <p>John called in wanted to what name appears on the bill</p>
11/29/2017	Telephone Call	Other Issues General Inquiry	Closed	
11/29/2017	Telephone Call	IVR Account Balance Inquiry	Closed	No Notes on File
11/29/2017	Telephone Call	Moves New Service Inquiry/Request	Closed	No Notes on File

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

- 10.** Please confirm that on February 6, 2018, KAWC informed Bent Tree that both Kirklevington and Redding Road meters had been replaced with no explanation given.

**Response:**

KAWC confirms that the meters were changed out but cannot confirm whether any communications were had that day with Mr. Marquette, or, if there were communications, what the substance of those communications was. KAWC states that the purpose of the meter changes was to install meters that were capable of providing usage logs.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

- 11.** Please confirm that Bent Tree was informed in person on site at Bent Tree by KAWC personnel on March 9, 2018 that hourly flow reports would be generated by KAWC personnel.
  - a. Please confirm that the reports, which were not shared in writing with Bent Tree, indicated that the suspected leak was on the Redding Road meter and not on the Kirklevington meter as previously stated by KAWC.

**Response:**

KAWC does not have a record that confirms Bent Tree was informed in person on site at Bent Tree by KAWC personnel on March 9, 2018 that hourly flow reports would be generated, however KAWC does not necessarily dispute that this happened. KAWC does have hourly reports that were generated on March 7, 2018.

- a. The reports generated on March 7, 2018 indicate a possible intermittent leak at the Kirklevington meter. Please see KAWC's March 20, 2020 response to PSC 2-4.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

- 12.** Please confirm that KAWC representative Joshua Riley subsequently informed Bent Tree on July 15, 2018 that the suspected leak was in fact on the Kirklevington meter and not on the Redding Road meter as KAWC had previously instructed Mr. Marquette on site on March 9, 2018.

**Response:**

KAWC confirms that representative Joshua Riley informed Bent Tree on July 25, 2018 that the meter for account number ending in 559 is located on Kirklevington Road and that this account reflected usage that could indicate a leak. KAWC does not have a record that confirms a previous onsite conversation on March 9, 2018.

**KENTUCKY-AMERICAN WATER COMPANY  
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BENT TREE'S FIRST REQUEST FOR INFORMATION**

---

**Witness: Jasmine S. Mungo**

- 13.** Please confirm that 20 weeks, or approximately 5 months, passed between KAWC's confirmation on March 9, 2018, to Bent Tree that the suspected leak was on the Redding Road meter and KAWC's reversal of that instruction on July 25, 2018 that the suspected leak was indeed on the Kirklevington meter.

**Response:**

KAWC confirms informing Bent Tree on July 25, 2018 that the meter for account number ending in 559 is located on Kirklevington Road and this account reflected usage that could indicate a leak.

KAWC has attached multiple emails and text messages that show communication with the customer between the dates of March 9, 2018 and July 25, 2018.



**From:** [Brack Marquette](#)  
**To:** [Jarold T Jackson](#)  
**Cc:** [James E Keeton](#); [Susan L Lancho](#); [REDACTED]  
**Subject:** COULD CUSTOMER ADVOCACY PLEASE CONTACT ME ASAP? RE: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY  
**Date:** Monday, July 16, 2018 11:30:19 AM

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**EXTERNAL EMAIL - "Think before you click!"**

ALL: Bent Tree would like to get its suspected leak problem cleared up as soon as possible. Could someone from Customer Advocacy please contact me? It is going on a full year since we've tried to piece together the facts about our water service at Bent Tree and would like to get a resolution in place . . . but need important interaction and details from KAWC so we can be fully sure American Leak Detection is searching in the correct place. Appreciate all the help you have provided and for this help to activate our contacts from Customer Advocacy. Thanks. Brack

---

**From:** Jarold T Jackson <[REDACTED]>  
**Sent:** Thursday, June 21, 2018 4:37 PM  
**To:** MARQCOM <[REDACTED]>  
**Cc:** James E Keeton <[REDACTED]>  
**Subject:** RE: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY

Mr. Marquette,

I received your communication and turned it over to our Customer Advocacy team for follow up. They will retain the hold as you have requested. We are scheduling a crew to obtain the flow information and will provide you with the findings early next week. If you have any further questions, please let me know.

---

**From:** MARQCOM <[REDACTED]>  
**Sent:** Wednesday, June 13, 2018 1:35 PM  
**To:** Jarold T Jackson <[REDACTED]>  
**Cc:** Brack Marquette <[REDACTED]>  
**Subject:** Fwd: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY

**EXTERNAL EMAIL - "Think before you click!"**

RESENDING. Got email wrong first time. Need your advice Tx. Brack

Brack Marquette  
[REDACTED]

----- Forwarded message -----

From: "MARQCOM" <[REDACTED]>

Date: Fri, May 25, 2018 at 9:58 AM -0400

Subject: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY

To: <[REDACTED]>

Cc: "KAWC Diedre Talbert" <[REDACTED]>, "Brack Marquette"

<[REDACTED]>, "Rick Campbell" <[REDACTED]>, "Shawn Behan"

<[REDACTED]>, "Bent Tree Laura Hall" <[REDACTED]>,

"Barbara Larkin" <[REDACTED]>, <[REDACTED]>,

<[REDACTED]>

JEROLD:

Since Our last meeting concerning the suspected Bent Tree Condos Water leak, American leak detection has made a survey of all of the units tied to the meter on Redding Road and have not... NOT ... Been able to corroborate Kentucky Americans findings and estimates for a leak Thus, we are still in a bit of a pickle trying to determine what the exact situation is.

BEFORE we call the leak detection professionals back to our property there are several things that we need to check or re-track... And I need your help as soon as possible on these matters:

1. Confirmation again that the KAWC flow records you shared with me upon your last visit were indeed for the Redding Road meter
2. Pls provide a new FLOW report for the month of MAY for BOTH meters—Redding Road and Kirklevington ... and EMAIL a copy of those to me so I can have them to share with the leak detection crew.
3. CONTINUE THE “HOLD” on the billing for the account with the large outstanding balance AND please do not disconnect.
4. Please communicate the “HOLD” to LexServe Sewer so their records will be in tandem with those at KAWC.

And, from your perspective and professional experience, what else should Bent Tree be doing to locate the suspected leak?

Thanks,

Brack

Brack Marquette  
[REDACTED]

American Water Works Company Inc., 1025 Laurel Oak Road, Voorhees, NJ 08043 [www.amwater.com](http://www.amwater.com)

**From:** Brack Marquette <[REDACTED]>  
**Sent:** Friday, June 29, 2018 11:18 AM  
**To:** Jarold T Jackson  
**Cc:** [REDACTED]; 'Barbara Larkin'; [REDACTED]  
**Subject:** Much thank for your response . . . and Have not been contacted by Customer Advocacy . . . RE: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY

**EXTERNAL EMAIL - "Think before you click!"**

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**From:** Jarold T Jackson <[REDACTED]>  
**Sent:** Thursday, June 21, 2018 4:37 PM  
**To:** MARQCOM <[REDACTED]>  
**Cc:** James E Keeton <[REDACTED]>  
**Subject:** RE: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY

Mr. Marquette,

I received your communication and turned it over to our Customer Advocacy team for follow up. They will retain the hold as you have requested. We are scheduling a crew to obtain the flow information and will provide you with the findings early next week. If you have any further questions, please let me know.

---

**From:** MARQCOM <[REDACTED]>  
**Sent:** Wednesday, June 13, 2018 1:35 PM  
**To:** Jarold T Jackson <[REDACTED]>  
**Cc:** Brack Marquette <[REDACTED]>  
**Subject:** Fwd: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY

**EXTERNAL EMAIL - "Think before you click!"**

RESENDING. Got email wrong first time. Need your advice Tx. Brack

Brack Marquette  
[REDACTED]

----- Forwarded message -----

**From:** "MARQCOM" <[REDACTED]>  
**Date:** Fri, May 25, 2018 at 9:58 AM -0400

Subject: REMAINIG ISSUES WITH BENT TREE KEAK DISCOVERY

To: <[REDACTED]>  
Cc: "KAWC Diedre Talbert" <d[REDACTED]>, "Brack Marquette" <[REDACTED]>, "Rick Campbell" <[REDACTED]>, "Shawn Behan" <[REDACTED]>, "Bent Tree Laura Hall" <[REDACTED]>, "Barbara Larkin" <[REDACTED]>, <[REDACTED]>, <[REDACTED]>

JEROLD:

Since Our last meeting concerning the suspected Bent Tree Condos Water leak, American leak detection has made a survey of all of the units tied to the meter on Redding Road and have not... NOT ... Been able to corroborate Kentucky Americans findings and estimates for a leak Thus, we are still in a bit of a pickle trying to determine what the exact situation is.

BEFORE we call the leak detection professionals back to our property there are several things that we need to check or re-track... And I need your help as soon as possible on these matters:

1. Confirmation again that the KAWC flow records you shared with me upon your last visit were indeed for the Redding Road meter
2. Pls provide a new FLOW report for the month of MAY for BOTH meters—Redding Road and Kirklevington ... and EMAIL a copy of those to me so I can have them to share with the leak detection crew.
3. CONTINUE THE “HOLD” on the billing for the account with the large outstanding balance AND please do not disconnect.
4. Please communicate the “HOLD” to LexServe Sewer so their records will be in tandem with those at KAWC.

And, from your perspective and professional experience, what else should Bent Tree be doing to locate the suspected leak?

Thanks,

Brack

Brack Marquette  
[REDACTED]

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[www.amwater.com](http://www.amwater.com)

**From:** [MARQCOM](#)  
**To:** [Josh D Riley](#); [REDACTED]  
**Cc:** [REDACTED]; "[Barbara Larkin](#)"; [REDACTED]; [Amy Caudill](#); [Jarold T Jackson](#); [Jon W Felts](#); [Roderick Sherman](#); [Brack Marquette](#)  
**Subject:** REPLY. Re: BENT TREE REQUESTS TO KY AMER WATER RE: Requested Starter Email  
**Date:** Wednesday, July 25, 2018 11:54:27 AM

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**EXTERNAL EMAIL - "Think before you click!"**

Jason. Excellent. Tx MUCH. Will take a look at the reports. No worries about July 15...just was picking random dates and days of week to compare consumption when lots of owners home and lots away at work etc.

Back to you all soon on our plan for next step.

Brack

Brack Marquette  
[REDACTED]  
[REDACTED]

On Wed, Jul 25, 2018 at 9:00 AM -0400, "Joshua D Riley" <[\[REDACTED\]](#)> wrote:

Brack,

Thank you taking the time to compose this request email and allowing me the opportunity to provide you with all the information possible to assist in your investigation. First let me address your #3 request by the two attached Data Log Reports. The two reports only run up to 07/05/2018 which would be the day they were pulled but run all the way back to 03/31/2018 showing hourly usage activity between those dates. I realize this does not include 07/15/2018 as per your request however in order to acquire that data we need time to send another tech into the field so that they can pull the report off of the meter before we could provide it to you. We hope that the additional dates on the attached reports will help to make up for missing the 15<sup>th</sup>.

Now I will address your #1 #2 requests. Service orders worked on 07/18/2018 state that

account # 210010850993 or currently meter # 83113574 is located on Redding rd and that account #210010850559 or currently meter # 83113560 is located on Kirklevington Dr. Please be aware the field technicians indicated there are locks preventing entry into the vaults where the meters are located. If you do have a question while attempting to track down un explained usage simply looking at a recent bill, please find two attached, will provide you with the current meter number attached to each one of your accounts. That meter number will be located on the meter itself and can be identified visually.

Joshua Riley  
Operations Clerk  
Kentucky American Water  
2300 Richmond Rd  
Lexington KY 40514  
Phone: 859-335-3676  
Email: joshua.riley@amwater.com

**From:** [REDACTED]@benttreelexky.com <[REDACTED]@benttreelexky.com>  
**Sent:** Wednesday, July 18, 2018 10:08 AM  
**To:** Joshua D Riley <[REDACTED]>  
**Cc:** [REDACTED]; 'Barbara Larkin' <[REDACTED]>;  
[REDACTED]; [REDACTED]; [REDACTED]  
**Subject:** BENT TREE REQUESTS TO KY AMER WATER RE: Requested Starter Email

**EXTERNAL EMAIL - "Think before you click!"**

Josh:

Thank you for speaking with me by phone Monday with regard to efforts for Bent Tree Condominium Association, 401 Redding Road, to isolate the probable sector of our property where any water leak may be occurring. Previously, based on information from KAWC, American Leak Detection was unable to duplicate KAWC's findings. Thus, we are seeking KAWC's assistance in double checking all the available information/data before bringing American Leak Detection back to Bent Tree. And, as Mr. Jackson is aware, Bent Tree was constructed in the late 1970s to provide NO way to isolate the water supply to any of our 11 buildings or 44 units. The only shut off

valves are those INSIDE each separate and privately owned unit. Thus, the difficulty level in locating the presumed leak is high.

Here are the requests we have been making:

In an effort to make doubly sure we are linking the correct meter to the largest monthly bill:

1. Please confirm in writing to Bent Tree the actual street location for meter 210010850559 . . . Kirklevington or Redding?

2. Please confirm in writing to Bent Tree the actual street location for meter 210010850993 . . . Kirklevington or Redding?

In an effort to understand as fully as possible the “habits” of our “intermittent” leak and explore some non-leak possibilities for water use as outlined by American Leak Detection:

3. Please provide a 24-hour data consumption readout hour-to-hour of BOTH meters for the following dates:

April 15 (Sunday)

May 15 (Tuesday)

June 15 (Friday)

July 15 ((Sunday)

Please let me know if any of these requests are unintelligible given that I am not sure I’m using the correct water system terminology . . . let me know what I can clarify.

Thanks much for your assistance.

Brack Marquette  
Chair  
Bent Tree Condo Association

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**From:** Joshua D Riley <[REDACTED]>

**Sent:** Monday, July 16, 2018 12:41 PM

**To:** [brack](#) [REDACTED]



**Subject:** Requested Starter Email

Mr. Marqcom,

Per our phone conversation here is a starter email. At your convince please send me a list of the requests you have made and been unable to fulfill and I will everything I can to complete the requests for you. Looking forward to working with you on this. please note my direct contact information listed below as well.

Joshua Riley  
Operations Clerk  
Kentucky American Water  
2300 Richmond Rd  
Lexington KY 40514  
Phone: 859-  
Email:

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American Water Works Company Inc., 1025 Laurel Oak Road, Voorhees, NJ 08043 [www.amwater.com](http://www.amwater.com)

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American Water Works Company Inc., 1025 Laurel Oak Road, Voorhees, NJ 08043 [www.amwater.com](http://www.amwater.com)



Brack >

Mar 9, 2018, 9:17 AM

Gerald. Brack here. Can u bring with you the tool to open a regular water meter cover? The typical 12" round brown steel ones that fit over a residential meter. And do u happen to have a spare one I can buy? We have two of those INSIDE the property that Bent Tree owns that I need to access. That's one of the places we will be looking today. C u at 11 unless I hear differently from you. Am flexible all day. Brack

Subject

iMessage





Brack &gt;

Mar 26, 2018, 9:55 PM

Gerald. Brack

MARQUETTE here with Bent Tree Condos. Have checked my emails to see if KAWC was able to provide any details on yours and Wes's visit on Friday, March 9 ... but did not find any messages. I could have easily missed something. Can you provide any update? BTW today, March 26, was the end date of our billing "hold" on the Redding Road meter. Just needing

Subject

iMessage





Brack >

Road meter. Just needing to move ahead with a resolution. Tx for checking again. Brack.

Mar 27, 2018, 7:24 AM

Mr. Marquette,  
I will call you later this morning to discuss.

Mar 27, 2018, 9:15 AM

Am at app my until 1030a.  
Free after.

Mar 28, 2018, 11:36 AM

Subject

iMessage





Brack >

Mar 27, 2018, 7:24 AM

Mr. Marquette,  
I will call you later this morning to discuss.

Mar 27, 2018, 9:15 AM


Am at app my until 1030a.  
Free after.

Mar 28, 2018, 11:36 AM

Any chance we could still have our conversation?  
Brack. Bent Tree. Am open all day. U set the

Subject

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iMessage 





Brack >

Am at app my until 1030a.  
Free after.

Mar 28, 2018, 11:36 AM

Any chance we could still  
have our conversation?  
Brack. Bent Tree. Am  
open all day. U set the  
time.

I will be available around  
1:30 PM and I will call you  
then if that is a good time  
for you?

Mar 29, 2018, 2:09 PM

Subject

iMessage





Brack &gt;

Mar 29, 2018, 2:09 PM

Brack here. Much tx for call yesterday. TWO things:

1. Can I borrow the listening device tomorrow/Friday Thru Wednesday April 4?
2. Can u have the billing block on the Redding Road meter extended to April 30? It expired on Mar 26.

Yes and yes. We are not

Subject

iMessage





Brack >

2. Can u have the billing block on the Redding Road meter extended to April 30? It expired on Mar 26.

Yes and yes. We are not working tomorrow so you will need to pick them up before 4:30 PM today.

Mar 29, 2018, 3:59 PM

Headed over now.

OK

Got it. Tx!!

Subject

iMessage







Brack >

Apr 8, 2018, 5:27 PM

Gerald. Brack at Bent Tree here. Have not been able to get to all the units yet. Hope to finish up on Wednesday. Can I hold on to the listeners until apr 12 ??

Apr 9, 2018, 6:11 AM


Yes

Apr 9, 2018, 10:18 AM

Tx.

**Subject**

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iMessage 





Brack >

Wed, Jun 13, 11:58 AM

Jarod. Brack Marquette here. Bent Tree Condos. I just noticed this morning that an important email I sent you nearly 2 weeks ago had been returned because the email address was incorrect. Could you give me your correct email address so I can get that back over to you. It concerns the fact that leak detection could not duplicate the water company's findings. We are still in a ditch trying to discover calls. Need your

Subject

iMessage





Brack >

because the email address was incorrect. Could you give me your correct email address so I can get that back over to you. It concerns the fact that leak detection could not duplicate the water company's findings. We are still in a ditch trying to discover calls. Need your help. Thanks Brack

Wed, Jun 13, 1:32 PM

[jarold. \[REDACTED\]@ \[REDACTED\].com](mailto:jarold. [REDACTED]@ [REDACTED].com)

Delivered

Subject

iMessage



**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

- 14.** Please confirm Mr. Marquette requested in October 2017 that the Kirklevington Meter be tested.
- a. Please confirm KAWC did not test the Kirklevington Meter until Feb 7, 2018.
  - b. Please confirm KAWC did not test the meters until after repeated requests to do so by Bent Tree.

**Response:**

KAWC does not have a record of a request in October 2017 for the meter at the Kirklevington Road location to be tested.

- a. KAWC does have a record of testing the Kirklevington Meter on February 7, 2018.
- b. KAWC confirms that a November 29, 2017 conversation occurred between Mr. Marquette in which meter testing was discussed and which led to the initiation of KAWC's investigation into the matter discussed in response to Bent Tree's Question No. 8. That investigation led to the meters being tested in February 2018. Please also see the response to Bent Tree Question No. 9.

**KENTUCKY-AMERICAN WATER COMPANY  
CASE NO. 2019-00133  
BENT TREE'S FIRST REQUEST FOR INFORMATION**

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**Witness: Jasmine S. Mungo**

- 15.** Please confirm the Kirklevington meter number 060670947N was placed in service on or before 11-1-2016.
- a. Please confirm the meter was still in service when the volumetric readings significantly increased.
  - b. Please confirm that meter number 060670947N was removed sometime in January / February 2018.
  - c. Please confirm meter number 060670947N was replaced with meter 060629350N.
  - d. Please confirm water billings associated with meter number meter 060629350N returned to a pattern of historical usage after meter 060670947N was removed.

**Response:**

KAWC confirms that meter number 060670947N was placed into service October 24, 2016.

- a. While meter number 060670947N was still in place the volumetric readings increased over time.
- b. KAWC confirms that meter number 060670947N was removed on February 5, 2018 which means it has a service end date of February 4, 2018.
- c. KAWC confirms that meter number 060670947N was replaced with meter number 060629350N.
- d. KAWC disputes that usage returned to a pattern of historical usage after meter 060670947N was removed. The usage began decreasing before meter 060670947N was removed. Although there was a decrease, the usage did not return to a historical pattern.