

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC APPLICATION OF KENTUCKY- |) | |
| AMERICAN WATER COMPANY TO AMEND |) | CASE NO. |
| TARIFF TO REVISE QUALIFIED |) | 2021-00090 |
| INFRASTRUCTURE PROGRAM CHARGE |) | |

COMMISSION STAFF'S POST-HEARING 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 an electronic version of the following information. The information requested herein is due on June 11, 2021. The Commission directs Kentucky-American to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 that indicates 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 Commission's Staff's Third Request for Information (Staff's Third Request), Item 1. Provide a schedule that breaks down by the main that was replaced in QIP1 and will be replaced in QIP2 by vintage and by mile of main replaced.

2. Refer to Commission Staff's Third Request, Item 3. Identify which Kentucky-American Staff attended each meeting of Lexington-Fayette Urban County

Government's Utility Coordinating Committee meeting in 2017, 2018, 2019, 2020, and 2021, and provide copies of the meeting minutes for each of those minutes.

3. Provide a schedule with the impact on QIP2 rider charge if Kentucky-American used a 13-month average rather than an end-of-year project cost as the basis for the QIP2 rider charge. Provide the schedule in Excel format with all formulas, rows, and columns unprotected and fully accessible.

4. Refer to the Hearing Testimony of Krista Citron, generally. Provide a list of the prequalified contractors to whom Kentucky-American currently solicits bids from on more complex QIP projects.

5. Provide, in narrative form and in a schedule, how the accelerated spend on QIP main replacement impacted the aggregate capital spending in 2020, 2021, and 2022 if available; and if QIP spending is in lieu of capital spending, how is it split between QIP and base rates. Provide the schedule in Excel format with all formulas, rows, and columns unprotected and fully accessible.

6. If Kentucky-American's aggregate capital spending in 2020, 2021, and 2022 is approximately the amount anticipated during the 2018 rate case, explain what happened to other projects identified but not constructed. This response should detail specific projects, and the impact on those projects from changes in capital spending plans, such as increasing category B main replacements/relocations from \$14 million a year to \$20 million.

7. Refer to the Hearing Testimony of Nick O. Rowe, generally. Provide a copy of documents listing Kentucky-American's capital project needs or requests and their related amounts, in isolation or the aggregate, and any off-budget capital projects that

Brent O'Neill or Kurt Stafford formally requested from American Water Company on behalf of Kentucky-American for years 2017, 2018, 2019, 2020, 2021, and 2022 if available. In addition to the documents that evidence Kentucky-American's needs and requests for capital sent to American Water Company, provide all responsive documents from American Water Company to those requests, including documentation evidencing the final allocation of capital for the given periods.

8. Provide a list of all change orders for paving restoration costs that were denied for recurring and investment projects in the last five years, and provide a reason why each change order was denied.



Linda C. Bridwell, PE
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Public Service Commission
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DATED JUN 03 2021

cc: Parties of Record

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