

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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 electronic version of the following information. The information requested herein is due on May 25, 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. All responses 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 association or a governmental agency, be accompanied by a signed certification of the

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.

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 Case No. 2018-00358,² Direct Testimony of Brent E. O'Neill, Exhibit B, page 4, Table 3, which lists the number of miles of existing material type installed by decade, and page 9, Table 5, which provides the percentage of breaks between January 2012 and December 2017 by pipeline material type. Provide a table listing the total number of miles of each existing pipeline material type as of June 30,

² Case No. 2018-00358, *Electronic Application of Kentucky-American Water Company for an Adjustment of Rates* (filed Nov. 28, 2018).

2019, and, for each material type listed in Table 5, provide the total number of miles of pipeline that are scheduled to be replaced in Qualified Infrastructure Plan (QIP) Year 1, and are projected to be replaced in QIP Years 2–5.

2. Refer to Kentucky-American’s response to Commission Staff’s First Request for Information, Item 18, and Commission Staff’s Second Request for Information (Staff’s Second Request), Item 7a, regarding revisions to Lexington-Fayette County Urban Government (LFUCG). Provide a citation to the revised LFCUG ordinance or ordinances.

3. Refer to LFUCG Ordinance Section 17C-7.h, which requires Kentucky-American to designate a representative to the LFCUG Division of Engineering’s Utility Coordinating Committee. Provide the name or names of Kentucky-American’s representatives to the Utility Coordinating Committee in 2017, 2018, 2019, 2020, and 2021.

4. Refer to Staff’s Second Request, Item 7a, which states that the LFCUG ordinance on pavement restoration practices does not provide a straightforward process for estimating the amount of pavement to be restored. Provide specific details, with actual examples, that expand upon this statement and schedules of actual additional costs for QIP projects that were incurred due to the revised ordinance.

5. For each recurring capital project A-S, provide a schedule by month for January 1, 2020, through March 31, 2021, comparing the budgeted amount to the amount that was actually spent. The comparative schedule should include QIP projects and be in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

6. For each recurring capital project A-S, provide a schedule by month for January 1, 2020, through March 31, 2021, comparing the budgeted amount to the amount that was actually spent. The comparative schedule should exclude QIP projects and be in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

7. For each budget project expenditure, provide a schedule by month for January 1, 2020, through March 31, 2021, comparing the budgeted amount to the amount that was actually spent. The comparative schedule should be in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.



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Public Service Commission
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DATED MAY 12 2021

cc: Parties of Record

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