

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                       |   |            |
|---------------------------------------|---|------------|
| ELECTRONIC INVESTIGATION OF KENTUCKY- | ) |            |
| AMERICAN WATER COMPANY'S ALLEGED      | ) | CASE NO.   |
| VIOLATION OF A TARIFF AND COMMISSION  | ) | 2022-00299 |
| REGULATIONS REGARDING METERS AND      | ) |            |
| MONITORING CUSTOMER USAGE             | ) |            |

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

Kentucky-American Water Company (Kentucky-American), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on February 10, 2023. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 and scanned 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 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Kentucky-American's Tariff, P.S.C. KY NO. 9, First Sheet No. 13, Item j.
  - a. Provide a detailed narrative of Kentucky-American's procedures for monitoring customer usage.
  - b. Explain what Kentucky-American considers an unusual deviation from historical usage.

c. Explain the different steps Kentucky-American takes to determine the reason for an unusual deviation from historical usage.

2. Explain how Kentucky-American estimates customer bills when it is unable to obtain a meter reading.

3. When a customer's meter has been estimated for two consecutive months, explain the procedures Kentucky-American follows to attempt to obtain a reading to comply with 807 KAR 5:006, Section 7(5)(a).

4. Provide the title and name of the person whose responsibility it is to monitor a deviation in a customer's usage.

a. If the position is not currently filled, explain what steps Kentucky-American has taken to ensure the monitoring is still occurring.

b. Provide the personnel policy assigning the responsibility. If there is not a written policy, provide all emails exchanged assigning the responsibility or detailing the expectations of the position.

5. Provide any instances since January 2018 when a single customer received an estimated bill for more than two consecutive months. In each instance, provide the name, address, and number of consecutive months of estimated billing. Refer to 807 KAR 5:001E, Section 13, for requests for confidential treatment.

6. Provide all documentation for instances of two or more consecutive meter misreads from 2018 to the present. In each instance, provide the name, address, and number of consecutive months of estimated billing. Refer to 807 KAR 5:001E, Section 13, for requests for confidential treatment.

7. Refer to Kentucky-American's response to Commission Staff's First Request for Information (Staff's First Request), Item 3, Attachment 1, Summary by Year Worksheet.

- a. Provide a detailed description for each type of skip code listed.
- b. Indicate which skip codes Kentucky-American would consider to be beyond its control.

8. Refer to Kentucky-American's response to Staff's First Request, Item 3, Attachment 2. Explain the reason(s) Kentucky-American had to estimate 15,146 bills in August 2022.

9. Refer to Kentucky-American's response to Staff's First Request, Item 4, Attachment 1, Summary Worksheet.

- a. Provide a detailed description for each type of Repair Install Reading Device Incompletion Code listed.
- b. Provide a detailed description for each type of Stop Consecutive Estimate Incompletion Codes listed.

10. Refer to Kentucky-American's response to Staff's First Request, Item 4, Attachment 3, Pivot Worksheet. Provide a detailed description for each code listed.

11. Refer to Staff's First Request, Item 8. Provide an update from August 2022 to January 2023 regarding the number of employees dedicated to meter maintenance each month.

12. Refer to Staff's First Request, Item 9. Provide an update from August 2022 to January 2023. Provide a monthly update for each month.

13. Provide Kentucky-American's monthly net income since January 1, 2017.

14. Provide Kentucky-American's year-to-date income on a monthly basis from January 1, 2017.

15. Provide Kentucky-American's implied return on equity for each year from 2017 to the present.

16. Explain how Kentucky-American calculates the proper amount for a leak adjustment when a customer's usage has been estimated multiple months during the six billing periods prior to the request for the leak adjustment. In such cases, explain whether Kentucky-American would go back and adjust the leak adjustment amount when it obtains six-months of actual meter readings.

17. Explain what steps Kentucky-American takes to notify a customer of an estimated bill. Include how the customer is notified, who is responsible for ensuring notification occurs, and when the notification occurs. Provide any documentation to support that notification attempts were made, by whom, and when.

18. Explain what steps Kentucky-American takes to notify a customer of unusually high water usage. Include how the customer is notified, who is responsible for ensuring notification occurs, and when the notification occurs. Provide any documentation to support that notification attempts were made, by whom, and when.



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DATED JAN 26 2023

cc: Parties of Record

Case No. 2022-00299

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