

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| 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 POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY-AMERICAN WATER COMPANY

Kentucky-American Water Company (Kentucky-American), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than July 10, 2023. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a copy of any Order by the Commission, or any other documents, that grant(s) Kentucky-American a deviation from 807 KAR 5:006, Section 7(5)(a) or 807 KAR 5:006, Section 7(5)(b).

2. Provide the exact number of accounts that received 12 months of consecutive estimated meter reads for the past five years, regardless of whether the readings were within a calendar year. In the response indicate whether the meters are

inside or outside meters. Also include in the response, if the accounts are active or inactive.

3. Provide the number accounts that have inside meters.
4. Provide the number of accounts that have outside meters.
5. Provide the list of the accounts with meter interface units (MIUs) that are not operable. Include in the response, the date the list was created. If there have been prior lists of accounts with non-operable MIUs, provide those lists and the date the list was created. If there are multiple lists, provide every list and the date each list was created.
6. Refer to 807 KAR 5:006, Section 7(5)(d). For every meter that had more than two estimated meter reads since 2018, provide the date and time Kentucky-American was unable to perform a meter read, the reason why the failure to read the meter was beyond Kentucky-American's control. Include in the response a narrative explanation, not merely a skip code. Also include in the response, any attempts made by Kentucky-American to then re-read the meter prior to the next billing cycle.
7. Refer to Kentucky-American's response to the Attorney General's First Request for Information (Kentucky-American's Response to the Attorney General's First Request), Item 2, Attachment 1. Provide an update through May 2023.
8. Refer to Kentucky-American's response to Commission Staff's First Request for Information (Kentucky-American's Response to Staff's First Request), Item 1, Attachment 1. Provide specific information about the customer education Kentucky-American engaged in, including dates and times of any public forums or comment

sessions. Provide copies of the any documents that were created by Kentucky-American for this community outreach, including copies of the Facebook posts.

9. Refer to Kentucky-American's response to Commission Staff's Fourth Request for Information (Kentucky-American's Response to Staff's Fourth Request), Item 1. Provide all documentation relating to Ms. Owen's account and the estimated reads. Include in the response all work orders, all service orders, or all internal electronic communication regarding the account regardless of whether the communication involved the customer service personnel.

10. Refer to the May 17, 2023 Order, page 20² and also refer to Case No. 2023-00042.³ Provide all internal documentation related to Ms. Ehram's informal complaint referenced in the May 17, 2023 Order. Also provide all internal documentation, including electronic communication, related to Ms. Ehram's formal complaint. Provide a detailed explanation as to why, in the informal process, Ms. Ehram was not granted relief but was granted relief when a formal complaint was filed.

11. Provide any policy, written or unwritten, that explains what Kentucky-American believes is "outside its control" so that a meter does not have to be read. Include in the response an explanation for inside and outside meters.

12. For inside meters, provide two charts that show the internal steps of how service orders are processed – one chart for meter read service orders and one chart for estimated bill read service orders.

² Order (Ky. PSC May 17, 2023).

³ Case No. 2023-00042, *Kathryn A. Ehram v. Kentucky-American Water Company*.

13. For outside meters, provide two charts that show the internal steps of how service orders are processed – one chart for meter read service orders and one chart for estimated bill read service orders.

14. Provide the contract or the engagement agreement between Concentric Energy Advisors and Kentucky-American for consultation on this case. Include any invoices or expenses provided by Concentric Energy Advisors for this investigation.

15. Provide invoices for legal fees, travel expenses including meals, airfare, and lodging for all witnesses as it relates to this investigation, include a total for the full amount.

16. Refer to the June 8, 2023 formal hearing testimony of Oscar Portillo. Provide the Kentucky-American policy and tariff provision(s) that allow for an adjustment of a bill after a customer complaint is filed.

17. Refer to each informal complaint attached to the May 17, 2023 Order.⁴ Provide the name of the investigator assigned, describe each action taken to resolve the complaint, including any documentation of field visits, all internal notes made by investigator, any electronic communication within Kentucky-American regarding each specific complaint, and work orders.

18. Provide a description of the bill true-up process, including related written policy or procedure. Include an explanation if the estimated meter reads were consecutive for at least three months, more than 12 months and the name of the person or persons who must approve the true-up.

19. Provide a sample bill, or a copy of a bill, that a customer would receive when their meter reading is estimated.

⁴ Order (Ky. PSC May 17, 2023).

20. Provide a sample bill, or a copy of a bill, a customer would receive indicating a true-up of the account had occurred because of an incorrect estimated read.

21. Refer to 807 KAR 5:006, Section 7(5). Explain whether Kentucky-American considers the MIU not property transmitting data as “beyond its control” so that a meter does not have to be read. Include in the explanation how Kentucky-American reached this conclusion.

22. Provide the Commission case or any other documentation that granted Kentucky-American permission to install automatic meter read (AMR) MIU technology.

23. Provide a list of meters for the past five years that, when pulled because the MIU failed, still accurately read and displayed usage. If a meter was pulled and not tested, provide an explanation as to why not for each instance.

24. Provide any internal communication or conversations, including with personnel employed by American Water Works Company, Inc. (American Water) about the level of staffing needed to read meters and service meters. Include any information about the amount of personnel that would be necessary to read all meters manually, if necessary.

25. Refer to Kentucky-American’s Response to the Attorney General’s First Request, Item 2, Attachment 1. Provide the number of hydrant meters that have received consecutive estimated reads. Provide the reason in narrative form, not a skip code, that hydrant meters continue to receive estimated reads.

26. Refer to Item 24. For the hydrant meters that have received multiple consecutive reads, provide how Kentucky-American accounts for non-revenue water loss accurately based upon the consecutive reads. Explain whether the Lexington Fayette

Urban County Government Fire Department reports are reconciled with the estimated reads.

27. Confirm that Kentucky-American only tests meters pulled at a customer's request. If not, explain when Kentucky-American would test a pulled meter.

28. Refer to 807 KAR 5:006, Section 11(3)(b) and (c). Explain the policies, procedures, or equipment Kentucky-American utilizes to monitor unusual deviations in water usage. Include in the response how Kentucky-American determines if the usage is high and not otherwise explained so that a meter test is conducted.

29. Provide a list of all meters that Kentucky-American has identified as inactive with consumption in the last five years. For each meter, provide:

a. How many months each meter has been inactive with consumption.

b. If the meter has been inactive with consumption since October 19, 2020.⁵

c. Every attempt that was made to go to the location to determine if there was a resident.

30. Provide any policies from Kentucky-American or American Water on how often attempts should be made to determine if there is a resident at the locations with meters that are inactive with consumption.

31. For every meter on the list in Item 29 explain why there has not been a meter disconnection order. Include in the response any work orders or service orders

⁵ Office of Governor Andy Beshear, Executive Order 2020-881 (Oct. 19, 2020), https://governor.ky.gov/attachments/20201019_Executive-Order_2020-881_Uutilities.pdf, lifted the moratorium on utility disconnections for nonpayment.

related to the meters. Also include any internal electronic communication regarding the decision not to issue meter disconnect orders for the meters in question.

32. Refer to Kentucky-American's Response to Staff's Fourth Request, Item 9. Explain why Executive Order 2020-881 expired on October 19, 2020, but a service order was not created to disconnect service until August 18, 2022.

33. Provide Kentucky-American's monthly water loss reports from January 2023 through May 2023.

34. Explain how Kentucky-American accounts for the water that is used at the meters that are inactive with consumption. Explain where the water loss from the meters that are inactive with consumption fall into the water loss reports.

35. Provide the number of people Kentucky-American has referred for criminal prosecution for theft of water in the last five years. In the response, note if any of these people were the account holders or residents at locations having an inactive meter with consumption listed in response to Item 29.



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cc: Parties of Record

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