

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 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 October 30, 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. Refer to Kentucky-American's response to Commission Staff's Post-Hearing Request for Information (Staff's Post-Hearing Request), Item 1. Also refer to Kentucky-American's response to Staff's Post-Hearing Request, Item 3. Explain if the 1,227 customer-read meters in the response to Item 1 are the same as the 1,227 inside meters in the response to Item 3.

2. Provide an explanation of Kentucky-American's customer read meters, including manufacturer and model. Provide the procedure on how the customer reports usage information to Kentucky-American.

3. Provide the address of the 1,227 customer-read meters.

4. Explain if Kentucky-American has plans to phase out the customer-read meters, include any expected phase out dates.

5. Provide the current Kentucky-American tariff that permits self-read meters.

6. Refer to Kentucky-American's response to Staff's Post-Hearing Request, Item 2. For the 705 meters that have a minimum of 12 months of estimated reads, provide:

a. The exact number of estimated reads each meter has received.

b. The last estimated read.

c. A narrative explanation, not merely skip codes, of why the meter has received more than three estimated reads.

7. Provide the number of meters that have received more than three consecutive estimated reads since 2019.

8. Refer to Kentucky-American's response to Staff's Post-Hearing Request, Item 7. Reconcile the statement, "The Company recognizes that multi-month periodic read order failures are a concern, and wants to note that as of May 2023, there were only 7 active accounts (out of approximately 140,000) which had been estimating for an extended period of time (11 months or more)" with Kentucky-American's response to Staff's Post-Hearing Request, Item 2 that states 705 meters have received at least 12 months of consecutive estimates.

9. Refer to Kentucky-American's response to Staff's Post-Hearing Request, Item 7. Provide the date each meter in the response was repaired. If not yet repaired, explain why not.

10. Refer to Kentucky-American's response to Staff's Post-Hearing Request, Item 7. Provide the number of meters that have received estimated reads for three months up to ten months.

11. Refer to Kentucky-American's response to Staff's Post-Hearing Request, Item 7. Also refer to 807 KAR 5:006, Section 7(5)(a). Explain why Kentucky-American considers 11 months excessive when 807 KAR 5:006, Section 7(5)(a) requires meters to be read at least quarterly.

12. Refer to Kentucky-American's response to Staff's Post-Hearing Request, Item 11. Explain why Kentucky-American does not have a written policy for what is "outside its control" so that a meter does not have to be read.

13. Explain why Kentucky-American should be permitted to include inactive with consumption in its water loss report.



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DATED SEP 06 2023

cc: Parties of Record

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