

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)	2023-00030
INFRASTRUCTURE CHARGE)	

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

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 on August 3, 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. For each the following questions, refer to the final Order in Case No.2022-00032,² which states:

[t]he Commission directs Kentucky-American that its end-of-period update to QIP 3 should reflect the actual construction costs incurred for the QIP 3 projects as of January 31, 2023, and the remaining five months (February 1, 2023-June 30, 2023) of the QIP 3 period should reflect the forecasted construction costs for that period. Additionally, any differences

² Case No. 2022-00032, *Electronic Application of Kentucky-American Water Company to Amend Tariff to Revise Qualified Infrastructure Program Charge* (Ky. PSC June 30, 2023), Order, pages 9–10.

between the forecasted construction costs for the remaining period and what was forecasted in the instant case should be supported by filed testimony.

Additionally, refer to the Direct Testimony of Tricia Sinopole (Sinopole Direct Testimony), Exhibit 1 in Case No. 2022-00032, and the supplemental Direct Testimony of Jefferey Newcomb (Newcomb Supplemental Testimony), Exhibit 1 in this matter.

a. In Sinopole Direct Testimony, Exhibit 1, the total estimated cost of QIP 3 Plant Additions was \$8,737,865. In Newcomb Supplemental Testimony Exhibit 1, the revised total estimated cost of QIP 3 Plant Additions is \$29,387,592. For each QIP 3 project, provide a detailed explanation of project, cost, and listing of scope changes made to each project that generated additional cost to the project.

b. For each QIP 3 project, provide an itemized breakdown of the original estimated cost and the actual final cost. Provide a detailed explanation for any variances and include documentation supporting these variances.

c. For the period July 2022 through July 2023, provide, by month, an itemized breakdown of the original estimated QIP 3 monthly project costs and the actual expended costs. Provide a detailed explanation for variances including scheduling, supply chain issues and project management issues and include documentation supporting the impact on cost.

d. For the QIP 4 projects, explain what actions Kentucky-American has taken, or plans to take, to reduce variances in estimated and actual project cost.



Por

Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JUL 21 2023

cc: Parties of Record

Case No. 2023-00030

*David Pippen
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Jeffrey Newcomb
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801