

accuracy which he claims was submerged in water when it was viewed by Kentucky-American employees. Ultimately, Mr. Young states that, as a result of his allegations, he was overbilled for January and February 2023.

Pursuant to Commission regulation in 807 KAR 5:001, Section 20(4)(a), upon receipt of a formal complaint, the Commission must determine whether the complaint establishes a *prima facie* case. A complaint establishes a *prima facie* case when, on its face, it states sufficient allegations that, if uncontradicted by other evidence, would entitle the complainant to the requested relief. If a complaint fails to establish a *prima facie* case, it may be dismissed.

Based upon a review of the tendered complaint, the Commission is unable to determine at this time whether the complaint establishes a *prima facie* case, but the allegations support further investigation into the merits of the complaint due to Mr. Young's allegations that the AMR/AMI Interface was submerged in water and that Kentucky-American did not do a thorough investigation regarding his complaint. The Commission finds that additional information is needed to assist it in making a determination of whether the complaint establishes a *prima facie* case. Therefore, Kentucky-American shall file its responses to Commission Staff's request for information, attached to this Order as Appendix A, on or before the date set forth in the request. Kentucky-American shall respond to any future requests for information propounded by the date or dates set forth on any such requests.

Additionally, any hearing scheduled in this matter shall be held on the designated day or days and continued until called from the bench by the presiding officer. Pursuant to 807 KAR 5:001, Section 2, if the hearing is not concluded on the designated day, the

hearing may be continued upon verbal announcement by the presiding officer. A verbal announcement made by the presiding officer shall be proper notice of the continued hearing. Hearings are held in the Richard Raff Hearing Room at the offices of the Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky. Witnesses who sponsor schedules, testimony, or responses to requests for information are expected to participate in person at a hearing.

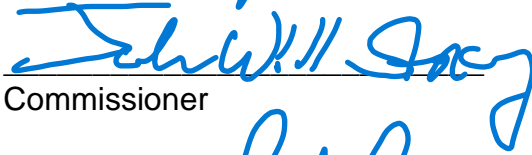
IT IS THEREFORE ORDERED that:

1. A copy of this Order shall be served on Kentucky-American for the sole purpose of requesting necessary documents and information to assist the Commission in determining whether the complaint establishes a *prima facie* case.
2. Kentucky-American shall respond to Commission Staff's request for information as provided in Appendix A attached to this Order.
3. Kentucky-American shall respond to any additional requests for information propounded by Commission Staff, as provided in those requests.
4. A copy of this Order shall be served on Mr. Bobby Young by U.S. certified mail, return receipt requested, at 1691 Donelwal Drive, Lexington, Kentucky 40511.

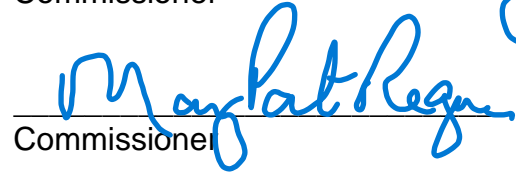
PUBLIC SERVICE COMMISSION



Chairman



Commissioner



Commissioner



ATTEST:



Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2023-00261 DATED SEP 25 2024

COMMISSION STAFF'S FIRST 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 on or before October 9, 2024. 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 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

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).

incomplete when made or, though correct and 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 the complaint filed by Bobby Young received August 1, 2023, and filed in Public Service Commission Case No.: 2023-00261.

a. Confirm that a Neptune R900 System Endpoint is attached to the Kentucky-American water meter serving 1691 Donelwal Drive, Lexington, Kentucky 40511 (Customer Address) during any or all portions of January 2023 and February 2023. If unable to confirm, identify which automated meter reading (AMR) or advanced metering infrastructure (AMI) system(s), if any, was utilized on the Kentucky-American water meter serving the Customer Address during any or all portions of January 2023 and February 2023.

b. If an AMR/AMI system was utilized at the Customer Address, identify the system, and provide the product sheet, including a picture of the product and a description of the system's capabilities. If the product sheet is unavailable, provide a detailed physical description of the system, its capabilities as well as a photograph of the system.

2. If an AMR/AMI system was utilized at the Customer Address explain whether or not the system is able to be tested for accuracy. If so, explain if the system was tested for accuracy as part the investigation into Mr. Young's complaint.

3. If an AMR/AMI system was utilized at the Customer Address, explain whether submerging that system in water can cause false meter readings. Provide any manufacture documentation supporting Kentucky-American's response.

4. If an AMR/AMI system was utilized at the Customer Address, state whether the system was submerged in water when investigated by Kentucky-American.

5. If an AMR/AMI system was utilized at the Customer address, identify all other reasons that the AMR/AMI system in question could cause it to malfunction and give false readings.

6. Explain in specific detail any and all of the steps that Kentucky-American performed in its investigation of Mr. Young's complaint.

Bobby Young
1691 Donelwal Drive
Lexington, KENTUCKY 40511

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Lexington, KY 40502

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