



LINDSEY W. INGRAM III
DIRECT DIAL: (859) 231-3982
DIRECT FAX: (859) 246-3672
L.Ingram@skofirm.com

300 WEST VINE STREET
SUITE 2100
LEXINGTON, KY 40507-1801
MAIN: (859) 231-3000
FAX: (859) 253-1093

June 6, 2024

ELECTRONICALLY SUBMITTED VIA E-MAIL

Linda C. Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

RECEIVED

JUN 06 2024

PUBLIC SERVICE
COMMISSION

Re: Case No. 2023-00155, Morgan Taylor v. Kentucky American Water

Dear Ms. Bridwell:

Enclosed please find Kentucky American Water's submission for filing in this non-electronic case. I hereby certify that: (1) this electronic submission is a true and accurate copy of the original documents in paper medium; (2) the electronic submission has been transmitted to the Commission on June 6, 2024; and (3) Complainant Morgan Taylor has been served with a paper copy of this filing on June 6, 2024 via U.S. Mail.

Very truly yours,

A handwritten signature in blue ink that reads "Lindsey W. Ingram III".

Lindsey W. Ingram III

Enclosure

cc: Morgan Taylor
4464 Stuart Hall Blvd. # 5102
Lexington, KY 40509

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2023-00155
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION

Responsible Witness: Roderick Sherman

1. Refer to Commission Case No. 2022-00299,¹ Kentucky-American provided information that it has made billing adjustments for certain Kentucky-American customers such as customers, Carol Becknell, Jason Barrett, and Steve Houston.²
 - a. State in specific detail if Complainant, Morgan Taylor, is eligible for a billing adjustment.
 - b. Is Complainant, Morgan Taylor, is not deemed eligible for a billing adjustment state in specific detail the reasons that she is not deemed eligible for a billing adjustment.
 - c. If Complainant, Morgan Taylor, is deemed eligible for a billing adjustment state in specific detail why she has not been allowed a billing adjustment to date.

Response:

- a. Ms. Taylor's request does not allege facts eligible for an adjustment. KAWC tested her meter and it was established that the meter was functioning properly and reading accurately. No other information has been given to KAWC which would warrant an adjustment.
- b. KAWC's tariff (at Sheet 44) allows specific billing adjustments to be made for hidden underground leaks from the customer service line upon proof that the leak has been repaired. This does not include leaks from toilets, hot water heaters, faucets, etc. Ms. Taylor did not allege she suffered from this type of hidden underground leak nor did she present KAWC with receipts showing such a leak was repaired.

KAWC has provided the PSC all requested documents, including Ms. Taylor's billing history, the results of the meter test, and the correspondence sent to the customer regarding the high usage. Described below are the billing adjustment options for a hidden leak adjustment and the adjustment process if the meter had not been functioning properly.

The hidden leak adjustment rate is available for residential and commercial customers. A charge of 25% of the applicable tariff will be applied to all water usage determined to be the result of a hidden underground leak.

A hidden underground leak is defined as a leak in the customer service line between the meter and the premises. The customer must provide a plumber's statement or list of

¹ Case No. 2022-00299, *Electronic Investigation of Kentucky-American Water Company's Alleged Violation of a Tariff and Commission Regulations Regarding Meters and Monitoring Customer Usage* (filed Sept. 27, 2022).

² Case No. 2022-00299, (filed May 25, 2023), *Kentucky-American Water Company's Response to Commission Staff's Fourth Request for Information*.

materials showing that the leak has been repaired. After verification of repairs by KAWC, the bill will be adjusted by comparing the usage during the leak billing period to the average usage for the past six billing periods. A reasonable estimate will be used in cases when six prior periods of information do not exist. The excess usage will be billed at the rate specified above. During the lifetime of a water service line only two leak adjustments will be permitted. Each adjustment may cover a maximum of two billing periods. Before a third adjustment can be considered, the entire water service line from the meter box to the premises must be replaced. Plastic pipe for repair of underground water service lines must be certified to withstand a working pressure of 160 pounds per square inch or greater.

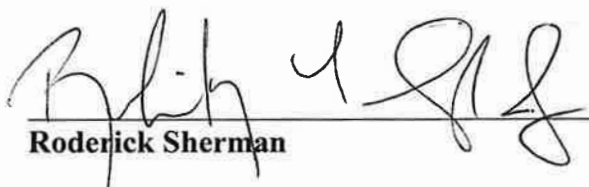
A billing adjustment for the rare occasion of an improperly functioning meter would be based on historical billing information using the same time frame in the previous year, last 12 months' average, or other months, depending on a customer's previous usage to determine an appropriate derived usage in the event of an improperly functioning meter. Again, Ms. Taylor's meter was determined to be functioning and reading properly, so she is not eligible for this type of adjustment.

- c. Ms. Taylor is not eligible for a billing adjustment for the reasons stated above.

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) **SS:**
COUNTY OF FAYETTE)

The undersigned, Roderick Sherman, being duly sworn, deposes and says that he is the Manager Operational Excellence Customer Advocacy-Operations for Kentucky-American Water Company, that he has personal knowledge of the matters set forth in the accompanying data responses for which he is identified as the responsible witness, and that the answers contained therein are true and correct to the best of his information, knowledge and belief.



Roderick Sherman

Subscribed and sworn to before me, a Notary Public in and before said County and State,
this 5th day of June, 2024.



Notary Public

My Commission Expires:
July 31, 2025
Notary ID: KYNP26988