

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO WOOD)	
CREEK WATER DISTRICT'S TERMINATION OF)	CASE NO.
WHOLESALE WATER SERVICE TO THE CITY)	2024-00359
OF LIVINGSTON FOR NONPAYMENT OF BILLS)	

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

Kentucky-American Water (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 December 20, 2024. The Commission directs Kentucky-American to the Commission's July 20, 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 any and all dates, and the time periods, during which the city of Livingston (Livingston) failed to provide water to Kentucky-American.
2. Provide any written contracts or agreements between Livingston and Kentucky-American or its predecessor, East Rockcastle Water Association.
3. State the monthly number of gallons of water Kentucky-American has purchased from Livingston from December 2021 to November of 2024.

4. State the rate at which Kentucky-American pays Livingston for water.
5. Provide any written correspondence between Livingston and Kentucky-American from December 2021 through November 2024. This should include letters, email correspondence and any other written correspondence.
6. Describe any actions being taken to assure there are no future failures to supply water to Kentucky-American from Livingston.
7. Provide the following information related to rates and service provided by Livingston:
 - a. State how long water has been provided at that rate,
 - b. The date of the last rate change,
 - c. The rate prior to the last rate change, and
 - d. Copies of any correspondence between Livingston and Kentucky-American related to that rate change, including but not limited to emails or letters.
8. State if Kentucky-American is current on all payments to Livingston or if there is any outstanding debt. If debt is owed, provide the amount and how long the debt has occurred.
9. State whether Kentucky-American provided any operational or technical assistance to Livingston between December 2021 and November 2024. If not, provide the reasoning for not doing so. If so, explain how it was initiated and if Kentucky-American the amount, if any, that Kentucky-American was compensated for the work.
10. Provide all bills and records of payments between Livingston and Kentucky-American from December 2021 to November of 2024.

11. Explain what caused the November 5, 2024 loss of water to Kentucky-American in Sand Hill.

12. Identify the entity that owns the meter between Livingston and Kentucky-American. State how often the meter is tested. Provide the last meter test results.

13. Provide any communications between Kentucky-American and any other party concerning any other entity operating the water or wastewater systems owned by Livingston. State when the communications took place, everyone involved, and what the nature of the communications was.

14. State if Kentucky-American received notice prior to the November 5, 2024 termination of service. If so, identify how the communication was received, when it was received, and from whom it was received.

15. State if Kentucky-American was aware of the outstanding balance for water service owed by Livingston to Wood Creek District. If so, state how Kentucky-American was made aware of it and when was Kentucky-American made aware of it.



Linda C. Bridwell, PE
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DATED DEC 05 2024

cc: Parties of Record

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