

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-	)	CASE NO.
AMERICAN WATER COMPANY FOR AN	)	2025-00122
ADJUSTMENT OF RATES	)	

COMMISSION STAFF'S FOURTH 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 September 8, 2025. The Commission directs Kentucky-American to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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 the Attorney General's Second Request for Information (Attorney General's Second Request), Item 14(b), specifically, "KAWC has dedicated four full time employees to water loss control technician positions". Provide the date these positions were created, responsibilities of those positions including any unrelated to water loss duties, if applicable, and provide the number of those positions that are currently vacant.

2. Refer to Kentucky-American's response to the Attorney General's Second Request, Item 19. Provide the justification for forecasting a total number of 168 employees, which is 16 employees higher than Kentucky-American has requested in Case No. 2018-00358<sup>2</sup> and 12 employees higher than requested Case No. 2023-00191.<sup>3</sup> Further, provide the total number of positions still needing to be filled by Kentucky-American.

3. Refer to the Direct Testimony of John Defever (Defever Direct Testimony), page 30, lines 1-2. Provide the amount of money tied to lobbying and political activity that Kentucky-American is requesting to include in its revenue requirement.

4. Refer to Kentucky-American's response to Staff's Third Request, Item 33. Explain why the actual expenditures exceeded budgeted expenditures for Qualified Improvement Plan (QIP) year 1 through QIP year 4.

5. Refer to Kentucky-American's response to Staff's Third Request, Item 36. Provide the support for Kentucky-American's forecasting methodology for materials, contract labor, and restoration costs associated with new services and laterals.

6. Refer to Kentucky-American's response to Staff's Third Request, Item 39. Confirm that Kentucky-American is requesting an adjustment to the forecasted test period for Spot Awards. If confirmed, state the amount and explain why the amount should be considered reasonable and recovered in rates.

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<sup>2</sup> Case No. 2018-00358, *Electronic Application of Kentucky-American Water Company for an Adjustment of Rates*.

<sup>3</sup> Case No. 2023-00191, *Electronic Application of Kentucky-American Water Company for an Adjustment of Rates, A Certificate of Public Convenience and Necessity for Installation of Advanced Metering Infrastructure, Approval of Regulatory and Accounting Treatments, and Tariff Revisions*.

7. Refer to Kentucky American's response to Attorney General's Second Request for Information, Item 73.

a. Provide the total capital expenditures for meter replacements in the base period for advanced meter read (AMR) meters.

b. Provide the total capital expenditures for meter replacements in the forecast period for AMR meters.

c. Provide the total capital expenditures for meter replacements in the base period for advanced metering infrastructure (AMI) meters.

d. Provide the total capital expenditures for meter replacements in the forecast period for AMI meters.

8. Refer to Application, Exhibit 37, Schedule J-5.

a. Confirm that Kentucky-American has not issued preferred stock since January 24, 1992. If not confirmed, provide the relevant dates and issuances.

b. Explain how Kentucky-American issues its preferred stock.

c. Explain a scenario when Kentucky-American would issue preferred stock over debt.



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DATED **AUG 22 2025**

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