

comprised of KAW personnel from various disciplines and job areas. The task force will determine the appropriateness, effectiveness, and best methods of implementing the conservation recommendations set forth in the conservation study. The task force requested additional information from the consultant relating to objective results normally achieved from the implementation of various conservation efforts. The task force received the supplemental information from the consultant and met in January 2010 to establish a timeline for implementation of some of the consultant recommendations.

The task force also determined that a team needs to be assembled that will focus on raising customer awareness of existing conservation programs and on internal efforts recommended by the consultant. The team met in February 2010 and implemented a winter conservation education program that included a customer bill insert for the month of February. The conservation team continued in March 2010 to distribute conservation materials and is developing additional customer education materials, including a bill insert that will provide detailed information to help customers track individual usage. In May 2010, KAW continued efforts to educate customers on how to read their bills to determine actual usage and how it impacts overall costs for the customer through additional distribution of materials. Additionally, KAW scheduled a bill insert for outdoor conservation tips and began billboard advertising for conservation.

In June 2010, KAW continued efforts to educate customers on outdoor conservation tips and continued its billboard advertising for conservation. KAW met with the Fayette County Public Schools to explore opportunities for partnerships both through education and assisting schools in water reduction programs. KAW awarded two grants totaling nearly \$20,000. These two grants went to the Hamburg Homeowners Association and the Friends of Raven Run to

assist with programs that focus on watershed protection and education efforts on preserving water resources.

In July and August 2010, KAW continued efforts to educate customers on outdoor conservation tips and billboard advertising for conservation. A copy of the billboard advertising is attached. KAW hosted an open house at the Richmond Road Station treatment plant on July 27, 2010 which had nearly 400 attendees. In addition to tours of the plant, KAW provided information on outdoor conservation and leak detection kits. On August 20, 2010, KAW participated in the Cane Run Watershed Festival developed by the LFUCG to promote water resource protection. KAW provided a sponsorship, had drinking water available, and provided additional information to participants on conservation tips, water quality, leak detection within the home, and reading the customer bill.

In September 2010, KAW concluded its efforts to educate customers on outdoor conservation tips. The education efforts included radio, television and billboard advertising. KAW ran additional information in the newspaper to help educate customers on reading and understanding their monthly bill, which is a key component of initiating conservation efforts. In addition to the efforts with civic groups, school systems, and industrial customers, KAW met with an apartment organization to discuss partnerships for residential audits, and with groups that are interested in additional information for low-income families.

During October 2010, KAW helped with the promotion of water resource awareness through the promotion of additional watershed festivals, participating with the LFUCG on a water management fee stakeholder committee, and hosting a Medtoss location so that local residents can drop off for disposal expired prescription medications thus preventing their

migration into the water supply. These efforts have helped support the conservation programs through heightened awareness of water as a critical natural resource.

In November 2010, KAW began its efforts to educate customers on indoor conservation starting with cold weather tips. This included a news release and posting on the KAW website. KAW concluded its radio campaign on general wise water tips.

In December 2010, KAW continued its efforts to educate customers on indoor conservation with cold weather tips. This included media and billboard information as well as information on the KAW website. KAW continued to promote to its customers use of the Watersense product program developed by the USEPA that certifies products as being water efficient. KAW also continued to pursue partnerships for additional conservation programs.

In January 2011, KAW continued the indoor conservation efforts and Watersense program mentioned above. KAW also initiated a partnership with the Chrysalis House, a non-profit organization in Lexington by providing a grant for water efficient fixtures and providing a consultant to review the facilities and recommend the most cost effective upgrades.

In February 2011, KAW continued its efforts to educate customers on indoor conservation with cold weather tips through information on the KAW website and continued its efforts relating to the Watersense program. KAW met with the Fayette County Public Schools to explore a partnership on both conservation education programs and conservation programs. The Conservation Team met to review the program and budget, as well as work on Annual Report on Conservation for customers. KAW is working with Bluegrass PRIDE to develop grant and educational resources to further promote conservation programs.

In March 2011, KAW continued to promote to its customers use of the Watersense product program developed by the USEPA that certifies products as being water efficient. KAW

continued to work out details of partnerships with Bluegrass PRIDE and the Fayette County Public Schools to focus on both conservation education programs and conservation programs. The Conservation Team continued work on the Customer Conservation Annual Report that will be sent to customers after the Consumer Confidence Report is completed in time for outdoor water efficiency awareness. KAW met with the Homebuilders Association of Lexington to discuss water efficiency opportunities and with representatives of the LFUCG Legacy Trail to sponsor signage related to water resource awareness. KAW is helping sponsor the Green Habitat Build that is scheduled in Lexington for this year.

In April 2011, KAW continued its efforts related to Watersense, Bluegrass PRIDE, and Fayette County Public Schools mentioned above. Additionally, rain barrel programs sponsored with Bluegrass PRIDE are scheduled for June in Scott and Franklin Counties. Rain garden workshops have also been scheduled for the early summer. The Conservation Team continued to work on the Customer Conservation Annual Report that will be sent to customers this summer. KAW met with the Kentucky Community and Technical College System to discuss water conservation opportunities and with representatives of University of Kentucky extension program to sponsor an education program for farmers to promote best management practices. KAW is helping sponsor the Green Habitat Build that is scheduled in Lexington for this year.

In May 2011, KAW continued its efforts related to the Watersense program, rain barrels and rain gardens. KAW continued to review models for a partnership with Fayette County Public Schools to promote conservation through the Watersense program and a follow-up meeting is scheduled for August. KAW employees participated in the Green Habitat Build program referenced above. The Consumer Confidence Report information regarding water quality was mailed to all customers as bill inserts in May. KAW continued its efforts to promote

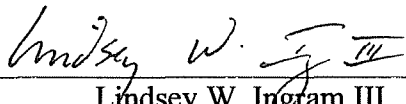
watershed awareness through the award of three environmental grants and continued sponsorship of Trout in the Classroom, a program that promotes raising trout in school classrooms as part of a learning experience for the need for healthy waterways.

In June 2011, KAW continued to promote to its customers use of the Watersense program. A Rain Barrel program sponsored with Bluegrass PRIDE is scheduled for July 19th in Scott County, while the program in Franklin County was postponed from June and has not been rescheduled. Rain garden workshops and lawn care workshops are also being scheduled. KAW continued to review models for a partnership with Fayette County Public Schools to promote conservation through the Watersense program and a follow-up meeting is scheduled for August. The Conservation Team continued to work on the Customer Conservation Annual report that will be sent to customers this summer and KAW helped sponsor the Green Habitat Build mentioned above. KAW continued its efforts to promote watershed awareness through the award of three environmental grants which were awarded in June at the Fayette County arboretum. A revision to KAW's Water Shortage Response Program (drought management plan) was drafted in June and is under internal review. Finally, KAW continues to pursue partnerships for additional conservation programs with civic groups, school systems, industrial customers, and other organizations.

At this time, the plans discussed above are still being finalized. Therefore, to the extent that water usage effects from the implementation of the plans can be isolated and measured, those effects have not occurred.

Respectfully submitted,

STOLL KEENON OGDEN PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3000

BY: 

Lindsey W. Ingram III
Attorneys for Kentucky-American Water Company

CERTIFICATE OF SERVICE

This is to certify that the original and ten (10) copies of the foregoing have been filed with the Public Service Commission this the 1st day of July, 2011, and a copy mailed to:

David E. Spenard, Esq.
Dennis G. Howard II, Esq.
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

David Barberie, Esq.
Leslye M. Bowman, Esq.
Lexington-Fayette Urban County Gov't.
Department of Law
200 East Main Street
Lexington, KY 40507

Tom FitzGerald, Esq.
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602

David F. Boehm, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

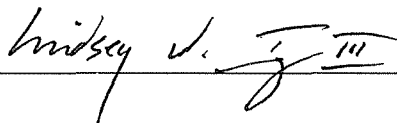
Damon R. Talley, Esq.
112 N. Lincoln Blvd.
P.O. Box 150
Hodgenville, KY 42748-0150

John N. Hughes, Esq.
124 W. Todd Street
Frankfort, KY 40601

John E. Selent, Esq.
Edward T. Depp, Esq.
Dinsmore & Shohl LLP
1400 PNC Plaza
500 West Jefferson St.
Louisville, KY 40202

Barbara K. Dickens, Esq.
Louisville Water Company
550 South Third Street
Louisville, KY 40202

STOLL KEENON OGDEN, PLLC

By 

NRW Status Report

1 July 2011

The Gannett Fleming (GF) study on Non Revenue Water (NRW) for Kentucky American Water (KAW) was supplied to the PSC in early September 2009. KAW has assembled a task force that includes a cross section of KAW personnel from various disciplines and job duties to assess each recommendation, and determine how to best integrate the recommendation into KAW operations.

The report's Executive Summary identifies 6 tasks and makes recommendations related to each. Only the tasks with pending actions in October 2010 are referenced in this report.

Under Task 1, GF recommended four actions. Four of the four recommended main replacement projects are complete.

Under Task 4, GF has recommended two metering studies that may offer value in ensuring metering accuracy. KAW conducted a detailed meter demand study which includes continuous/instantaneous metering. This metering is an ongoing process.

Under Task 5, the GF study made three recommendations. The first and third recommendations were addressed in prior reports and are complete. The second recommendation deals with property owners who do not address known

leaks on private services. KAW continues to work with customers to address these issues.

Under Task 6, GF offers three recommendations, all involving adoption of the IWA/AWWA tracking methodology. KAW is already implementing both of the first two and continues to move forward on the third. The company's 12 month rolling NRW is 12.5% at May 31, 2011, as compared to 13.7% at the time of the GF study.

The IWA/AWWA methodology offers transparency into the various components of non-revenue water that may supplement information provided on the current PSC water loss reports.