

DATA REQUESTS

2038. Regarding the S. Smith vs RWC settlement for \$1,000,000; the M. Dupree vs RWC settlement of \$40,000; and the E. Cox vs RWC settlement of \$58,000, please answer the following:

- a. What was the Company's insurance premium amount (that was utilized for payment of damages) before settlement?

Effective 4/30/20 coverage was transferred to Cincinnati Insurance. Settlement amounts were paid by previous Insurance provider after the transfer of coverage therefore did not affect insurance premium amounts.

S.Smith- date of incident 4/27/20, date of settlement 12/6/22

M.Dupree- date of incident 2/25/20, date of settlement 8/8/23

E.Cox- no EPLI coverage at time of incident; 3/20/2020

- b. Was the insurance premium increased as a result of the ruling? If yes, how much did it increase? **No.**
- c. What is the total annual insurance policy premium amount currently? **\$68,100.00**

2039. Is RWC asking the Commission to approve any costs (including legal) related to the lawsuits of M. Dupree, S. Smith, or E. Cox (as referenced in OPC DR2038)? If yes, please: **No**

- a. Indicate what lawsuit;
- b. Breakdown what the costs are covering for and the amount for each specific related expense (e.g., settlement, legal, etc.);
- c. The total amount the Company is seeking to recover from ratepayers for the given lawsuit; and
- d. A brief narrative description why these costs should be incurred by ratepayers.

2040. How much do the "locking lids" on the meter wells cost per lid and in total?

We do not know a per lid and total price for the lids without vendor input because those costs are wrapped into a price that includes a

number of things. We have requested this breakdown from our vendor and will share once received.