

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF KENTUCKY-AMERICAN )  
WATER COMPANY TO ESTABLISH A LATE- ) CASE NO. 2012-00155  
PAYMENT FEE )

ORDER

Kentucky-American Water Company ("Kentucky-American") has proposed a revision to its rate schedule to establish a five-percent late payment fee for customers who fail to timely pay their bills. Based upon our review of the record, we find that the proposed fee is consistent with Commission regulations and grant our approval.

PROCEDURE

On March 30, 2012, Kentucky-American filed with the Commission a proposed revision to its filed rate schedules to establish a late payment fee of five percent. It proposed an effective date of April 30, 2012 for the proposed revision. On April 24, 2012, Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. ("Community Action") filed objections to and requested a formal investigation of the proposed revision. On April 27, 2012, the Commission suspended operation of the proposed late payment fee for five months, initiated an investigation into the reasonableness of the proposed late payment fee, and made Community Action a party to the proceeding. The Attorney General ("AG") and Lexington-Fayette Urban County Government ("LFUCG") subsequently intervened in the proceeding.

On May 15, 2012, Kentucky-American amended the proposed late payment fee to include an exemption for low-income customers who receive assistance with paying their water bills. It advised the Commission that all intervening parties had agreed to this revision and requested that the Commission dispense with further proceedings in the matter and immediately approve the proposed fee as amended. On May 25, 2012, the Commission denied Kentucky-American's motion for immediate decision and directed Kentucky-American to respond to Commission Staff's request for information.

After receipt of Kentucky-American's responses to Commission Staff's request for information, the Commission ordered Kentucky-American to provide additional information on the proposed late payment fee and further directed that the case would stand submitted unless a request for a hearing was received within seven days of Kentucky-American's response to the Commission's Order. On August 7, 2012, no request for hearing having been received, the case stood submitted for decision.

#### BACKGROUND

Kentucky-American, a Kentucky corporation, owns and operates water production and distribution facilities that provide water service to 122,765 customers for compensation in Bourbon, Clark, Fayette, Gallatin, Grant, Harrison, Jessamine, Owen, Scott, and Woodford counties, Kentucky. It provides wholesale water service to Harrison County Water Association, East Clark Water District, Jessamine-South Elkhorn Water District, and the cities of Georgetown, Midway, North Middletown, Nicholasville, and Versailles.<sup>1</sup> Kentucky-American's most recent rate adjustment occurred in

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<sup>1</sup> *Annual Report of Kentucky-American to the Kentucky Public Service Commission for the Year Ended December 31, 2011* at 30, 32.

December 2010 when the Commission authorized rates that were expected to increase revenues from water sales by 29.1 percent.<sup>2</sup>

In 2011, Kentucky-American issued 1,555,098 bills for water service. Approximately 289,306 of these bills, or 18.6 percent of all issued bills, were not paid by the due date.<sup>3</sup> Of the bills not timely paid, approximately 228,559 of these bills resulted in the issuance of disconnection notices.<sup>4</sup> The remaining 60,747 bills were paid without the issuance of such notice.<sup>5</sup>

Kentucky-American estimates that these late customer payments cost the utility approximately \$1,224,892. Approximately \$1,046,029 of this amount is related to operation and maintenance type costs, such as the employment of customer advocates, postage for additional notices, and collection agency fees. The remaining \$178,862 relates to the cost of working capital that substitutes for unpaid or late paid bills.<sup>6</sup>

In an effort to properly allocate these costs and to create an incentive for customers to pay their bills in a timely manner, Kentucky-American proposes to establish a late payment fee of five percent. It argues that the lack of a late payment fee has encouraged customers to pay other bills before paying their bills for water service. It notes that Kentucky Utilities Company ("KU") and Columbia Gas of Kentucky, Inc. ("Columbia Gas"), two other utility providers in Kentucky-American's

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<sup>2</sup> Case No. 2010-00036, *Application of Kentucky-American Water Company for an Adjustment of Rates Supported by a Fully Forecasted Test Year* (Ky. PSC Dec. 14, 2010).

<sup>3</sup> Kentucky-American's Response to Commission Staff's First Request for Information, Item 13(a).

<sup>4</sup> *Id.* Item 13(c).

<sup>5</sup> *Id.* Item 13(d).

<sup>6</sup> App. Ex. 3.

service area, assess a late payment fee of five percent.<sup>7</sup> As a result, Kentucky-American customers are more likely to pay the bills from those utility providers first to avoid late payment fees and pay their bills for water service later.<sup>8</sup> Kentucky-American also argues that the revenues that the proposed fee will generate, which are estimated to be \$669,467 annually,<sup>9</sup> will help delay the time of its next requested rate increase.<sup>10</sup>

To address Intervenor concerns about the effect of the proposed late payment fees on low income customers and the agencies that provide assistance to such customers, Kentucky-American, at the request of Community Action and with the apparent agreement of the AG and LFUCG, proposes to exempt “[c]ustomers who receive a pledge for or notice of low income water assistance from an authorized agency.”<sup>11</sup> Kentucky-American asserts that this exemption is consistent with Commission precedent.<sup>12</sup> Community Action argues that “[f]ailure to waive the late payment fee in instances of low income assistance payments will result in further

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<sup>7</sup> See Kentucky Utilities Company Tariff, P.S.C. No. 15, Second Revision of Original Sheet No. 5 (issued Feb. 17, 2012); Columbia Gas of Kentucky, Inc. Tariff, P.S.C. Ky. No. 5, Third Revised Sheet No. 74 (issued Nov. 6, 2009).

<sup>8</sup> App. ¶ 10; Kentucky-American’s Response to Commission Staff’s First Request for Information, Item 5.

<sup>9</sup> App. Ex. 5.

<sup>10</sup> App. ¶ 10.

<sup>11</sup> Kentucky-American’s Notice of Agreed Resolution ¶ 6.

<sup>12</sup> See, e.g., Case No. 2009-00141, *Application of Columbia Gas of Kentucky, Inc. for an Adjustment In Rates* (Ky. PSC Oct. 26, 2009); Case No. 2009-00548, *Application of Kentucky Utilities Company for an Adjustment of Base Rates* (Ky. PSC July 30, 2010). *But see* Case No. 2004-00103, *Adjustment of the Rates of Kentucky-American Water Company* (Ky. PSC Feb. 28, 2005) at 82-83; Case No. 91-066, *Application for Adjustment of Electric Rates of Kentucky Power Company* (Ky. PSC Oct. 31, 1991).

limiting the already substantially inadequate funds available for assistance.”<sup>13</sup> The proposed exemption is expected to reduce late fee collections by \$3,050.<sup>14</sup>

### DISCUSSION

Commission regulations authorize a utility to assess a late payment fee. 807 KAR 5:006, Section 8(3)(h), provides:

A penalty may be assessed if a customer fails to pay a bill for services by the due date shown on the customer's bill. The penalty may be assessed only once on any bill for rendered services. Any payment received shall first be applied to the bill for service rendered. Additional penalty charges shall not be assessed on unpaid penalty charges.

Limited legal authority on late payment fees indicates that such fees are lawful.<sup>15</sup> A survey of the rate schedules filed with the Commission, the results of which are appended to this Order, indicates that 87.6 percent of all non-telecommunications utilities subject to Commission jurisdiction assess a late payment fee and that 94 percent of these utilities assess a late payment fee of five percent or more of the amount owed.

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<sup>13</sup> Letter from Iris Skidmore, Counsel for Community Action Council, to Jeff Derouen, Executive Director, Public Service Commission (Apr. 24, 2012) at 1.

<sup>14</sup> Electronic mail message from Lindsey W. Ingram III, counsel for Kentucky-American Water Company, to Gerald Wuetcher, Commission Staff Counsel (Sep. 28, 2012).

<sup>15</sup> See, e.g., *Jones v. Kansas Gas and Electric Co.*, 565 P.2d 597, 605 (Kan. 1977) (“Utilities cannot refuse to serve a slow-paying customer or a credit risk who might be turned away by a local merchant. In order to compensate for this factor utilities are allowed to require deposits and impose late charges to minimize the risk of bad debts.”); *Coffelt v. Arkansas Power and Light Co.*, 451 S.W.2d 881, 884 (Ark. 1970) (“The late charge . . . is in fact a device by which consumers are automatically classified to avoid discrimination. Its effect is to require delinquent ratepayers to bear, as nearly as can be determined, the exact collection costs that result from their tardiness in paying their bills.”); *Low-Income Consumers Union v. Oregon Pub. Util. Comm’n*, 946 P.2d 1164, 1166 (Or. App. 1997) (agreeing with the Commission that said, “it is a fair business practice to place the burden of collection costs on those customers responsible for them.”); *State ex. Rel. Utils. Comm’n v. North Carolina Consumers Council, Inc.*, 198 S.E.2d 98 (N.C. Ct. App. 1973); *State ex rel. Ashcroft ex inf. Pelzer v. Public Service Com’n*, 674 S.W.2d 660, 662 (Mo. App. 1984). See also American Water Works Association, *Principles of Water Rates, Fees, and Charges* 258 (5th Ed. 2000) (“A late-payment charge can be an incentive for prompt payment. This charge recognizes the time value of money and other added costs. It is common practice for a water utility to designate a period during which a bill must be paid to avoid late payment charges.”).

Kentucky-American proposes to establish a late payment fee outside of a general rate case. 807 KAR 5:011, Section 10, permits such action. It provides:

Nonrecurring charges are charges to customers due to a specific request for certain types of service activity for which, when the activity is completed, no additional charges may be incurred. Such charges are intended to be limited in nature and to recover the specific cost of the activity. Nonrecurring charges include reconnection charges, late payment fees, service order changes and hook-on or tap fees. This section allows a utility to seek a rate revision for a nonrecurring charge outside a general rate proceeding.

Section 10, however, limits a utility to two nonrecurring charge filings between general rate case proceedings<sup>16</sup> and requires the utility to demonstrate, if the additional revenue to be generated from the proposed fee exceeds by five percent the total revenues provided by all miscellaneous and nonrecurring charges for a recent 12-month period, the additional net income generated by the fee will not result in an increase in the rate of return (or other applicable valuation methods) to a level greater than that which was allowed in the most recent rate case.<sup>17</sup>

The proposed late payment fee meets these requirements. It is the first nonrecurring charge filing that Kentucky-American has made since its last general rate case proceeding. While Kentucky-American acknowledges that the proposed fee will generate revenues in excess of five percent of total revenues provided by all miscellaneous and nonrecurring charges for the 12-month period ending December 31, 2011,<sup>18</sup> it has submitted the results of an absorption test that demonstrate that, with the expected revenues generated by the proposed late payment fee, Kentucky-American's

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<sup>16</sup> 807 KAR 5:011, Section 10(3).

<sup>17</sup> 807 KAR 5:011, Section 10(2).

<sup>18</sup> App. Ex. 4.

rate of return on equity would not exceed the rate awarded in its last general rate case.<sup>19</sup> An absorption test using rate base rather than capital structure confirmed this result.<sup>20</sup>

The proposed late payment fee also meets the requirement that the amount of revenue recovered from a nonrecurring charge not exceed the cost of the specific activity. In this instance, Kentucky-American has indicated that late payment of customer bills results in annual costs of \$1,224,892.<sup>21</sup> Using actual billing and payments for calendar year 2011, Kentucky-American estimates that the proposed late payment fee will generate only \$669,467 annually.<sup>22</sup> Kentucky-American has acknowledged that the proposed fee will not recover all costs associated with late payments and that it sought a lower fee to ensure that debt collection costs are not imposed on customers who make late payments but whose late payments do not result in debt collection costs.<sup>23</sup>

While the proposed fee's compliance with 807 KAR 5:006 and 807 KAR 5:011 suggests that the proposed fee is reasonable and lawful, Kentucky-American has also compared the proposed fee to that assessed by other jurisdictional utilities. It notes that the larger utilities such as KU and Columbia Gas assess a late payment fee of five

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<sup>19</sup> In Case No. 2010-00036, the Commission awarded Kentucky-American a rate of return on equity of 9.7 percent. Kentucky-American's absorption test indicates that with the additional revenues Kentucky-American would earn a rate of return of 8.43 percent.

<sup>20</sup> Kentucky-American's Response to the Commission's Order of July 12, 2012, Item 2. In Case No. 2010-00036, the Commission awarded Kentucky-American a rate of return on rate base of 7.74 percent. Kentucky-American's absorption test indicated that, with the additional revenues, Kentucky-American would achieve a rate of return of 7.34 percent.

<sup>21</sup> App. Ex. 3.

<sup>22</sup> App. Ex. 5.

<sup>23</sup> Kentucky-American's Response to Commission Staff's First Request for Information, Item 11.

percent.<sup>24</sup> It notes that approximately 90 percent of all water utilities assess a late payment fee of ten percent.<sup>25</sup> Kentucky-American has also indicated that American Water Works Company subsidiaries in other states assess a similar or higher late payment fee.<sup>26</sup>

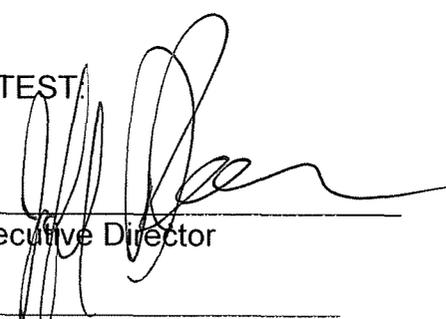
### SUMMARY

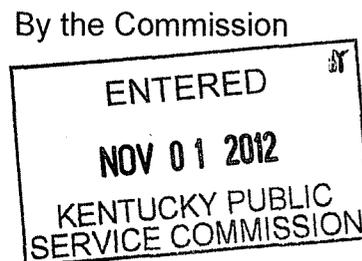
Having reviewed the proposed fee and taking notice of the general agreement of all parties as to the contents of the proposed tariff revision, the Commission finds that the proposed revision is consistent with 807 KAR 5:006 and 807 KAR 5:011, is reasonable in its terms and conditions, is consistent with prior Commission decisions, and should be approved.

IT IS THEREFORE ORDERED that:

1. Kentucky-American's proposed late payment fee, as amended and attached to its Notice of Agreed Resolution, is approved for service rendered on and after the date of this Order.
2. Within 20 days of the date of this Order, Kentucky-American shall file a revised tariff sheet setting forth the approved rate.

ATTEST:

  
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Executive Director



<sup>24</sup> App. ¶ 10.

<sup>25</sup> Kentucky-American's Response to Commission Staff's First Request for Information, Item 5.

<sup>26</sup> *Id.*, Item 18.

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2012-00155 DATED NOV 01 2012

## LATE PAYMENT FEES

Utility Name	Utility Type	Late Payment Fee	Amount	Exception
Adair County Water District	Water	Yes	No Amount	
Adair County Water District	Sewer	No		
Airview Utilities, LLC	Sewer	Yes	10 Percent	No
Allen County Water District	Water	Yes	10 Percent	No
American Electric Power	Electric	Yes	5 Percent	No
Appalachian Waste Control	Sewer	No		
Atmos Energy Corporation	Gas	Yes	5 Percent	No
Auxier Road Gas Company, Inc.	Gas	Yes	10 Percent	No
B & H Gas Company	Gas	Yes	10 Percent	No
B.T.U. Gas Company, Inc.	Gas	Yes	10 Percent	No
Barkley Lake Water District	Water	Yes	10 Percent	No
Bath County Water District	Water	Yes	10 Percent	No
Beech Grove Water System, Inc.	Water	Yes	10 Percent	No
Big Bear Wastewater, Inc.	Sewer	Yes	1.5 Percent	No
Big Rivers Electric Corporation	Electric	No		
Big Sandy R.E.C.C.	Electric	Yes	7 Percent	No
Big Sandy Water District	Water	Yes	10 Percent	No
Big Valley Sanitation, Inc. (Not Operational)	Sewer	No		
Black Mountain Utility District	Water	Yes	10 Percent	No
Black Mountain Utility District	Sewer	No		
Blue Grass Energy Cooperative Corp.	Electric	Yes	7.5 Percent	No
Bluegrass Gas Sales, Inc.	Gas	Yes	10 Percent	No
Boone County Water District	Water	Yes	10 Percent	No
Bracken County Water District	Water	Yes	10 Percent	No
Breathitt County Water District	Water	Yes	10 Percent	No
Brocklyn Utilities, LLC	Sewer	Yes	10 Percent	No
Bronston Water Association, Inc.	Water	Yes	10 Percent	No
Buffalo Trail Water Association, Inc.	Water	Yes	10 Percent	No
Bullitt Utilities, Inc. dba Hunters Hollow Sewer Plant	Sewer	Yes	10 Percent	No
Bullock Pen Water District	Water	Yes	10 Percent	No
Burkesville Gas Company	Gas	Yes	1.5 Percent	No
Butler County Water System, Inc.	Water	Yes	10 Percent	No
Caldwell County Water District	Water	Yes	10 Percent	No
Cannonsburg Water District	Water	Yes	10 Percent	No
Carroll County Water District #1	Water	Yes	10 Percent	No
Cawood Water District	Water	Yes	10 Percent	No
Cedar Hills Sanitation Disposal Corporation	Sewer	No		
Center Ridge Water District No. 2	Water	Yes	10 Percent	No
Christian County Water District	Water	Yes	10 Percent	No
CitiPower, L.L.C.	Gas	Yes	10 Percent	No
Clark Energy Cooperative, Inc.	Electric	Yes	5 Percent	No
Classic Construction, Inc.	Sewer	Yes	10 Percent	No
Columbia Gas of Kentucky, Inc	Gas	Yes	5 Percent	Yes - Waived for customers enrolled in a utility assistance program (including certificate of need)
Commonwealth Wastewater Systems, LLC	Sewer	Yes	5 Percent	No
Coolbrook Utilities, LLC	Sewer	Yes	10 Percent	No
Corinth Water District	Water	Yes	18 Percent	No
Cow Creek Gas, Inc.	Gas	Yes	15 Percent	No
Crittenden-Livingston County Water District	Water	Yes	10 Percent	No
Cumberland County Water District	Water	Yes	10 Percent	No
Cumberland Falls Highway Water District	Water	Yes	10 Percent	No
Cumberland Valley Electric, Inc.	Electric	Yes	5 Percent	No
Cunningham Water District	Water	Yes	10 Percent	No
Delaplain Disposal Company	Sewer	No		
Delta Natural Gas Company, Inc.	Gas	No		
Dema Gas Company, Inc.	Gas	Yes	10 Percent	No
Dexter-Almo Heights Water District	Water	Yes	10 Percent	No
Duke Energy Kentucky, Inc.	Electric	Yes	5 Percent	
Duke Energy Kentucky, Inc.	Gas	Yes	5 Percent	No
East Casey County Water District	Water	Yes	10 Percent	No
East Clark County Water District	Water	Yes	10 Percent	No
East Daviess County Water Association, Inc.	Water	Yes	10 Percent	No
East Kentucky Power Cooperative, Inc.	Electric	No		
East Laurel Water District	Water	Yes	10 Percent	No
East Logan Water District, Inc.	Water	Yes	10 Percent	No
East Pendleton Water District	Water	Yes	10 Percent	No
East Pendleton Water District Division II	Sewer	Yes	10 Percent	No
Eastern Rockcastle Water Association, Inc.	Water	Yes	10 Percent	No
Edmonson County Water District	Water	Yes	10 Percent	No
Edmonson County Water District	Sewer	Yes	10 Percent	No
Elkhorn Water District	Water	Yes	10 Percent	No
Estill County Water District #1	Water	Yes	10 Percent	No
Estill County Water District #1	Sewer	Yes	10 Percent	No
Evergreen Sewage Disposal System	Sewer	No		

## LATE PAYMENT FEES

Utility Name	Utility Type	Late Payment Fee	Amount	Exception
Farmdale Development Corporation	Sewer	Yes	10 Percent	No
Farmdale Water District	Water	No		
Farmers R.E.C.C.	Electric	Yes	5 Percent	
Fern Lake Company	Water	No		
Fleming County Water Association, Inc.	Water	Yes	10 Percent	No
Fleming-Mason Energy Cooperative, Inc.	Electric	Yes	5 Percent	No
Fountain Run Water District #1	Water	Yes	10 Percent	No
Fountain Run Water District #1	Sewer	Yes	10 Percent	No
Fox Run Utilities, LLC	Sewer	Yes	10 Percent	No
Francis Water Company, Inc.	Water	Yes	10 Percent	No
Friendly Park Development, Inc.	Sewer	No		
Gallatin County Water District	Water	Yes	10 Percent	No
Garrard County Water Association, Inc.	Water	Yes	10 Percent	No
Garrison-Quincy-Ky-O-Heights Water District	Water	Yes	10 Percent	No
Garrison-Quincy-Ky-O-Heights Water District Wastewater Division	Sewer	Yes	10 Percent	No
Grant County Sanitary Sewer District	Sewer	No		
Graves County Water District	Water	Yes	10 Percent	No
Graves County Water District	Sewer	No		
Grayson County Water District	Water	Yes	10 Percent	No
Grayson R.E.C.C.	Electric	Yes	10 Percent	No
Green Hills Water District	Water	Yes	10 Percent	No
Green River Valley Water District	Water	Yes	10 Percent	No
Green-Taylor Water District	Water	Yes	10 Percent	No
Hardin County Water District #1	Water	Yes	10 Percent	No
Hardin County Water District #1	Sewer	Yes	10 Percent	No
Hardin County Water District #2	Water	Yes	10 Percent	No
Harrison County Water Association, Inc.	Water	Yes	5 Percent	No
Henderson County Water District	Water	Yes	10 Percent	No
Hendron Water District	Water	Yes	10 Percent	No
Henry County Water District #2	Water	Yes	10 Percent	No
Heritage Operating, LP dba Bright's Propane Service, Inc.	Gas	Yes	\$7.50	No
Herrington Haven Wastewater Company, Inc.	Sewer	Yes	10 Percent	No
Hickory Water District	Water	Yes	10 Percent	No
Hyden-Leslie County Water District	Water	Yes	10 Percent	No
Inter-County Energy Cooperative Corporation	Electric	Yes	10 Percent	No
Jackson County Water Association, Inc.	Water	Yes	10 Percent	No
Jackson Energy Cooperative Corporation	Electric	Yes	5 Percent	No
Jackson Purchase Energy Corporation	Electric	Yes	5 Percent	No
Jessamine County Water District #1	Water	Yes	10 Percent	No
Jessamine-South Elkhorn Water District	Water	Yes	10 Percent	No
Jessamine-South Elkhorn Water District	Sewer	Yes	10 Percent	No
JoAnn Estates Utilities, Inc.	Sewer	Yes	\$10.00	No
Johnson County Gas Company, Inc.	Gas	Yes	10 Percent	No
Jonathan Creek Water District	Water	Yes	10 Percent	No
Judy Water Association, Inc.	Water	Yes	10 Percent	No
Kenergy Corp	Electric	Yes	5 Percent	Yes -1 Time for all customers; customers over 65 waived if paid within 30 days of billing date
Kentucky Frontier Gas, LLC	Gas	Yes	10 Percent	No
Kentucky Mountain Housing Development Corporation, Inc.	Sewer	Yes	10 Percent	No
Kentucky Utilities Company	Electric	Yes	5 Percent	Yes
Kentucky-American Water Company	Water	No		
Kentucky-American Water Company	Sewer	No		
Kingswood Development, Inc.	Sewer	No		
Kirksville Water Association, Inc.	Water	Yes	10 Percent	No
Knott County Water & Sewer District	Water	Yes	10 Percent	No
Knott County Water & Sewer District	Sewer	Yes	10 Percent	No
Knox County Utility Commission	Water	Yes	10 Percent	No
Knox County Utility Commission	Sewer	Yes	10 Percent	No
Lake Columbia Utilities, Inc.	Sewer	Yes	10 Percent	No
Lake Village Water Association, Inc.	Water	Yes	10 Percent	No
Larue County Water District #1	Water	Yes	10 Percent	No
Laurel County Water District #2	Water	Yes	10 Percent	No
Ledbetter Sewer District	Sewer	Yes	10 Percent	No
Ledbetter Water District	Water	Yes	10 Percent	No
Letcher County Water and Sewer District	Water	Yes	10 Percent	No
Letcher County Water and Sewer District	Sewer	Yes	10 Percent	No
Levee Road Water Association, Inc.	Water	Yes	5 Percent	No
Lewis Sanitation Company, Inc. d/b/a Garden Heights Sewer Division	Sewer	No		
Licking Valley R.E.C.C.	Electric	Yes	5 Percent	No
Longview Land Company, LLC	Sewer	No		

## LATE PAYMENT FEES

Utility Name	Utility Type	Late Payment Fee	Amount	Exception
Louisville Gas and Electric Company	Electric	Yes	5 Percent	Yes - low income customers who receive a pledge or notice of low income assistance from an authorized agency is exempted for 11 months following pledge
Louisville Gas and Electric Company	Gas	Yes	5 Percent	Yes - low income customers who receive a pledge or notice of low income assistance from an authorized agency is exempted for 11 months following pledge
Lovellaceville Water Company	Water	Yes	5 Percent	No
Lyon County Water District	Water	Yes	10 Percent	No
Lyon County Water District	Sewer	Yes	No Amount	
Madison County Utility District	Water	Yes	10 Percent	No
Magoffin County Water District	Water	Yes	10 Percent	No
Mallard Point Disposal Systems, Inc.	Sewer	Yes	\$5.00	No
Marion County Water District	Water	Yes	10 Percent	No
Martin County Water District	Water	Yes	10 Percent	No
Martin County Water District	Sewer	No		
Martin Gas, Inc.	Gas	Yes	10 Percent	No
McCreary County Water District	Water	No		
McCreary County Water District	Sewer	No		
McKinney Water District	Water	Yes	10 Percent	No
Meade County R.E.C.C.	Electric	Yes	10 Percent	No
Meade County Water District	Water	Yes	10 Percent	No
Middletown Waste Disposal, Inc.	Sewer	No		
Milburn Water District	Water	Yes	10 Percent	No
Millennium Energy, Inc.	Gas	Yes	5 Percent	No
Monroe County Water District	Water	Yes	10 Percent	No
Montgomery County Water District #1	Water	Yes	10 Percent	No
Morgan County Water District	Water	Yes	10 Percent	No
Mountain Water District	Water	Yes	10 Percent	No
Mountain Water District	Sewer	Yes	10 Percent	No
Muhlenberg County Water District	Water	Yes	10 Percent	No
Muhlenberg County Water District #3	Water	Yes	10 Percent	No
Murray #2 Water District	Water	Yes	10 Percent	No
Murray #3 Water District	Water	Yes	10 Percent	No
Natural Energy Utility Corporation	Gas	Yes	10 Percent	No
Navitas KY NG, LLC	Gas	Yes	5 Percent	No
Nebo Water District	Water	Yes	10 Percent	No
Nicholas County Water District	Water	Yes	10 Percent	No
Nixutil Sanitation Association, Inc.	Sewer	No		
Nolin R.E.C.C.	Electric	Yes	5 Percent	No
North Hopkins Water District	Water	Yes	6 Percent	No
North Logan Water District	Water	Yes	No Amount	
North Manchester Water Association, Inc.	Water	Yes	10 Percent	No
North Marshall Water District	Water	Yes	10 Percent	No
North McLean County Water District	Water	Yes	10 Percent	No
North Mercer Water District	Water	Yes	10 Percent	No
North Nelson Water District	Water	Yes	10 Percent	No
North Shelby Water Company	Water	Yes	10 Percent	No
Northeast Woodford County Water District	Water	Yes	10 Percent	No
Northern Kentucky Water District	Water	Yes	10 Percent	No
Oakwood Sewage Company	Sewer	Yes	\$5.00	No
Ohio County Water District	Water	Yes	No Amount	
Oldham County Water District	Water	Yes	10 Percent	No
Oldham Woods Sanitation, Inc.	Sewer	Yes	10 Percent	No
Overland Development, Inc.	Water	Yes	10 Percent	No
Owen Electric Cooperative, Inc.	Electric	Yes	5 Percent	No
P. R. Wastewater Management, Inc.	Sewer	No		
Parksville Water District	Water	Yes	10 Percent	No
Par-Tee LLC dba Perry Park Resort	Sewer	Yes	3 Percent	No
Peaks Mill Water District	Water	Yes	10 Percent	No
Pendleton County Water District	Water	Yes	10 Percent	No
Pinewood Subdivision, Inc. d/b/a Pinewood Subdivision Sewer	Sewer	Yes	10 Percent	No
Powell's Valley Water District	Water	Yes	10 Percent	No
Powell's Valley Water District	Sewer	Yes	10 Percent	No
Pro Man Property Management, LLC dba South Hills Subdivision Sewer Plant	Sewer	No		
Public Gas Company, Inc.	Gas	Yes	10 Percent	No
Purchase Public Service Corporation d/b/a Cardinal Group	Sewer	Yes	10 Percent	No
Purchase Public Service Corporation d/b/a Great Oaks Subdivision	Sewer	Yes	10 Percent	No
Purchase Public Service Corporation d/b/a Highland Club Estates	Sewer	Yes	10 Percent	No
Purchase Public Service Corporation d/b/a Thomas Country Estates	Sewer	Yes	10 Percent	No
R. A. Williams Development Co., Inc. d/b/a Cedarbrook Treatment Plant	Sewer	Yes	10 Percent	No
Rattlesnake Ridge Water District	Water	Yes	10 Percent	No

## LATE PAYMENT FEES

Utility Name	Utility Type	Late Payment Fee	Amount	Exception
Red Barn Waste Management, LLC	Sewer	Yes	\$10.00	No
Reid Village Water District	Water	Yes	10 Percent	No
Richardsville Gas Company, Inc.	Gas	Yes	10 Percent	No
Ridgelea Investments, Inc.	Sewer	Yes	10 Percent	No
River Bluffs, Inc.	Sewer	Yes	10 Percent	No
River Road Disposal Systems	Sewer	No		
Rowan Water, Inc.	Water	Yes	10 Percent	No
Salt River Electric Cooperative Corp.	Electric	Yes	5 Percent	No
Sandy Hook Water District	Water	Yes	10 Percent	No
Sedalia Water District	Water	Yes	10 Percent	No
Sentra Corporation	Gas	Yes	5 Percent	No
Shadow Wood Waste Environmental, LLC	Sewer	No		
Sharpsburg Water District	Water	Yes	10 Percent	No
Shelby Energy Cooperative, Inc.	Electric	Yes	10 Percent	No
Simpson County Water District	Water	Yes	10 Percent	No
Slick Rock Gas Company	Gas	No		
South 641 Water District	Water	Yes	10 Percent	No
South 641 Water District	Sewer	Yes	10 Percent	No
South Anderson Water District	Water	Yes	10 Percent	No
South Eastern Water Association, Inc.	Water	Yes	10 Percent	No
South Hopkins Water District	Water	Yes	10 Percent	No
South Kentucky R.E.C.C.	Electric	Yes	5 Percent	No
South Logan Water Association, Inc.	Water	Yes	10 Percent	No
South Shore Water Works Company	Water	Yes	10 Percent	No
South Woodford Water District	Water	Yes	10 Percent	No
Southeast Daviess County Water District	Water	Yes	10 Percent	No
Southern Madison Water District	Water	Yes	10 Percent	No
Southern Water & Sewer District	Water	Yes	10 Percent	No
Southern Water & Sewer District	Sewer	No		
Southside Water Association, Inc.	Water	Yes	10 Percent	No
Springcrest Sewer Company, Inc.	Sewer	Yes	10 Percent	No
Symsonia Water District	Water	Yes	10 Percent	No
Symsonia Water District	Sewer	Yes	10 Percent	No
Taylor County R.E.C.C.	Electric	Yes	5 Percent	No
Thelma Waste Control, Inc.	Sewer	Yes	10 Percent	No
Todd County Water District	Water	Yes	10 Percent	No
Trimble County Water District #1	Water	Yes	10 Percent	No
U. S. 60 Water District of Shelby and Franklin Counties	Water	Yes	10 Percent	No
Union County Water District	Water	Yes	10 Percent	No
Valley Gas, Inc.	Gas	Yes	\$7.50	No
Villas of Woodson Bend	Sewer	Yes	10 Percent	No
W & W Service Company	Sewer	No		
Warren County Water District	Water	Yes	10 Percent	No
Warren County Water District	Sewer	Yes	10 Percent	No
Water Service Corporation of Kentucky	Water	Yes	10 Percent	No
Watterson Woods Waste Management Company, Inc.	Sewer	No		
Webster County Sanitation	Sewer	Yes	10 Percent	No
Webster County Water District	Water	Yes	10 Percent	No
West Carroll Water District	Water	Yes	10 Percent	No
West Daviess County Water District	Water	Yes	10 Percent	No
West Laurel Water Association, Inc.	Water	Yes	10 Percent	No
West McCracken County Water District	Water	Yes	10 Percent	No
West Shelby Water District	Water	Yes	10 Percent	No
Western Fleming County Water District	Water	Yes	10 Percent	No
Western Lewis-Rectorville Water and Gas District	Gas	Yes	10 Percent	No
Western Lewis-Rectorville Water and Gas District	Water	Yes	10 Percent	No
Western Mason County Water District	Water	Yes	10 Percent	No
Western Pulaski County Water District	Water	Yes	10 Percent	No
Western Rockcastle Water Association, Inc.	Water	Yes	10 Percent	No
Whitley County Water District #1	Water	Yes	10 Percent	No
Willow Pointe Sanitation Company	Sewer	Yes	\$10.00	No
Wood Creek Water District	Water	Yes	10 Percent	No
Wood Creek Water District Wastewater Division	Sewer	Yes	10 Percent	No
Woodland Acres Utilities, LLC	Sewer	No		
Woodland Estates Sewage System	Sewer	Yes	10 Percent	No

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