COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In	th	9	N/	latt	er	Of:

ELECTRONIC APPLICATION OF JONATHAN)	CASE NO.
CREEK WATER DISTRICT FOR AN)	2021-00410
ALTERNATIVE RATE ADJUSTMENT)	

NOTICE OF FILING OF COMMISSION STAFF'S REPORT

Notice is hereby given that, in accordance with the Commission's Order of June 3, 2022, the attached report containing the findings of Commission Staff regarding the Applicant's proposed rate adjustment has been filed in the record of the above-styled proceeding. Pursuant to the Commission's June 3, 2022 Order, Jonathan Creek Water District (Jonathan Creek District) is required to file written comments regarding the findings of Commission Staff no later than 14 days from the date of this report. The Commission directs Jonathan Creek District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED <u>SEP 23 2022</u>

cc: Parties of Record

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).

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In	th	9	N/	latt	er	Of:

ELECTRONIC APPLICATION OF JONATHAN)	CASE NO.
CREEK WATER DISTRICT FOR A RATE)	2021-00410
ADJUSTMENT PURSUANT TO 807 KAR 5:076)	

COMMISSION STAFF'S REPORT ON JONATHAN CREEK WATER DISTRICT

Jonathan Creek Water District (Jonathan Creek District) is a water utility organized pursuant to KRS Chapter 74 that owns and operates a water distribution system through which it provides retail water service to approximately 2,636 residential customers and 120 commercial customers that reside in Marshall County, Kentucky.¹ As part of the final Order of Case No. 2021-00082, Jonathan Creek District was ordered to file for a general adjustment of rates or alternative rate filing within one year from the May 13, 2021 Order.² On May 13, 2022, Jonathan Creek District filed an application, pursuant to 807 KAR 5:076. Jonathan Creek District's last rate adjustment was in Case No. 2017-00323.³

Commission Staff notes that Jonathan Creek District's 2021 Annual Report reported a water loss of 25.85 percent.⁴ Commission regulation 807 KAR 5:066(6)(3) states that for ratemaking purposes, a utility's water loss shall not exceed 15 percent of

¹ Annual Report of Jonathan Creek District to the Public Service Commission for the Calendar Year Ended December 31, 2021 (2021 Annual Report) at 12 and 49.

² Case No. 2021-00082 Electronic Investigation into the Financial Capacity of Jonathan Creek Water District (Ky. PSC July 18, 2022).

³ Case No. 2017-00323, Application of Jonathan Creek Water District for an Alternative Rate Adjustment (Ky. PSC Dec. 21, 2017).

⁴ 2021 Annual Report at 57.

total water produced and purchased, excluding water consumed by a utility in its own operations. At a 25.85 percent water loss, the annual cost to Jonathan Creek District of water above the allowable 15 percent is \$7,683⁵ while the annual cost of total water loss is \$33,992.⁶

To comply with the requirements of 807 KAR 5:076, Section 9,⁷ Jonathan Creek District used the calendar year ended December 31, 2021, as the basis for its application. Using its pro forma test-year operations, Jonathan Creek District determined that a revenue increase of \$23,448, or 2.42 percent was necessary.

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	Purc	hased	Pι	ırchased	Pι	urchased	
	W	ater	1	Power	С	hemical	Total
2021 Pro Forma Expenses			\$	60,689	\$	10,119	\$ 70,808
Multiplied by: Water Loss in Excess of 15 Percent		10.85%		10.85%		10.85%	10.85%
Excess Cost	\$	-	\$	6,585	\$	1,098	\$ 7,683

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	Purchased Water		Purchased Power		Purchased Chemical		Total
2021 Pro Forma Expenses Multiplied by: Total Water Loss	\$	60,689 25.85%	\$	60,689 25.85%	\$	10,119 25.85%	\$ 131,497 25.85%
Excess Cost	\$	15,688	\$	15,688	\$	2,616	\$ 33,992

⁷ The reasonableness of the proposed rates shall be determined using a 12-month historical test period, adjusted for known and measurable changes that coincides with the reporting period of the applicant's annual report for the immediate past year.

		Jon	athan Creek Water
Operating Expe	enses	\$	897,011
Divide by:	Operating Ratio		88%
			1,019,331
Plus:	Interest Expense		6,456
Overall Revenu	ue Requirement		1,025,787
Less:	Other Operating Revenue		(30,865)
	Interest Income		(384)
	Nonutility Income		(3,317)
Revenue Regu	irement - Water Rates		991,221
Less:	Normalized Revenue from Service		(967,773)
2000.	Tromanzoa November Hom Corvice		(001,110)
Required Reve	nue Increase	\$	23,448
Percentage Increase			2.42%

To determine the reasonableness of the increase proposed by Jonathan Creek District, Commission Staff performed a limited financial review of Jonathan Creek District's test-year operations. The scope of Commission Staff's review was limited to determining whether operations reported for the test year were representative of normal operations. Known and measurable⁸ changes to test-year operations were identified and adjustments made when their effects were deemed material. Insignificant and immaterial discrepancies were not necessarily pursued or addressed.

⁸ Commission regulation 807 KAR 5:076, Section 9, sets the standard for the determination of the reasonableness of proposed rates and states, in pertinent part, that the test period shall be "adjusted for known and measurable changes." See also Case No. 2001-00211, The Application of Hardin County Utilities District No. 1 for (1) Issuance of Certificate of Public Convenience and Necessity; (2) Authorization to Borrow Funds and to Issue its Evidence of Indebtedness therefore; (3) Authority to Adjust Rates; and (4) Approval to Revise and Adjust Tariff (Ky. PSC Mar. 1, 2002); Case No. 2002-00105, Application of Northern Kentucky Utilities District for (A) an Adjustment of Rates; (B) a Certificate of Public Convenience and Necessity for Improvements to Water Facilities if Necessary; and (C) Issuance of Bonds (Ky. PSC June 25, 2003); and Case No. 2017-00417, Electronic Proposed Adjustment of the Wholesale Water Service Rates of Lebanon Water Works (Ky. PSC July 12, 2018).

Commission Staff's findings are summarized in this report. Travis Leach reviewed the calculation of Jonathan Creek District's Overall Revenue Requirement. Eddie Beavers reviewed Jonathan Creek District's reported revenues and rate design.

SUMMARY OF FINDINGS

- 1. Overall Revenue Requirement and Required Revenue Increase. By applying the Operating Ratio method, as generally accepted by the Commission, Commission Staff found that Jonathan Creek District's required revenue from rates is \$1,059,302 to meet the Overall Revenue Requirement of \$1,090,743, and that a \$91,529 revenue increase, or 9.46 percent, to pro forma present rate revenues is necessary to generate the Overall Revenue Requirement.
- 2. <u>Monthly Water Service Rates</u>. Jonathan Creek District proposed to increase all of its monthly retail water service rates by approximately 2.42 percent across the board. Jonathan Creek District has not performed a cost-of-service study (COSS). Jonathan Creek District stated that it did not complete a COSS at this time as there has been no material changes in the water system.⁹

The Commission has previously found that the allocation of a revenue increase evenly across the board to a utility's rate design is appropriate when there has been no evidence entered into the record demonstrating that this method is unreasonable and in the absence of a COSS. Finding no such evidence in this case, Commission Staff has followed the method previously accepted by the Commission and has allocated the

Commission Staff's Report Case No. 2021-00410

⁹ Jonathan Creek District's Response to Commission Staff's First Request (filed July 7, 2022) (Staff's First Request), Item 5.

\$91,529 revenue increase evenly across the board to Jonathan Creek District's monthly retail and wholesale water service rates.

The rates set forth in the Appendix to this report are based upon the revenue requirement, as calculated by Commission Staff, and will produce sufficient revenues from water sales to recover the \$1,059,302 Revenue Required from Rates, an approximate 9.46 percent increase. These rates will increase a typical residential customer's monthly water bill from \$33.12 to \$36.26, an increase of \$3.14, or approximately 9.48 percent.¹⁰

3. <u>Nonrecurring Charges.</u> Following the Commission's recent decisions,¹¹ Commission Staff has reviewed Jonathan Creek District's nonrecurring charges. The Commission found that as district personnel are currently paid during normal business hours, estimated labor costs previously included in determining the amount of Nonrecurring Charges should be eliminated from the charges. Commission Staff has reviewed the cost justification information provided by Jonathan Creek District and have adjusted these charges by removing Field Labor Coasts and Office/Clerical Labor Costs from those charges that occur during normal business hours.¹² Such adjustments result in the following revised nonrecurring charges:

¹⁰ The typical residential customer uses approximately 4,000 gallons per month.

¹¹ Case No. 2020-00141, Electronic Application of Hyden-Leslie County Water District for an Alternative Rate Adjustment (Ky. PSC Nov. 6, 2020) and Case No. 2020-00167, Electronic Application of Ohio County Water District for an Alternative Rate Adjustment (Ky. PSC Dec. 3, 2020), Case No. 2020-00196, Electronic Application of West Daviess County Water District for an Alternative Rate Adjustment (Ky. PSC Dec. 30, 2020), and Case No. 2020-00195 Electronic Application of Southeast Daviess County Water District for an Alternative Rate Adjustment, (Ky. PSC Dec. 30, 2020).

¹² Jonathan Creek District's Response to Staff's First Request, Item 8 and Jonathan Creek District's Response to Commission Staff's Second Request (filed Aug. 15, 2022) (Staff's Second Request), Item 2.

Nonrecurring Charges

Connection/Turn On Charge	\$19.00
Disconnection Charge	\$19.00
Field Collection Charge	\$19.00
Meter Reinstallation Charge	\$19.00
Meter Reread Charge	\$7.00
5/8" x 3/4" Meter Test Charge	\$54.00
1" Meter Test Charge	\$89.00
1 1/2" Meter Test Charge	\$89.00
2" Meter Test Charge	\$119.00
Field Meter Test Charge (2",3" and 4" Meters)	\$369.00
Reconnection Charge	\$19.00
Return Check Charge	\$10.00

The adjustment to the Nonrecurring Charges results in a decrease to the charges and an increase to the total revenue requirement of \$8,060 as shown below. Commission Staff recommends that Jonathan Creek District should adjust its nonrecurring charges to those found in the Appendix to this report.

	Num. ¹³	Current Rate	Total	Revised Rate	Adj	Pro Forma
Other Water Revenues						
Connection/Turn On Charge	251	\$35.00	\$8,785	\$19.00	(\$4,016)	\$4,769
Disconnection Charge	206	\$35.00	\$5,250	\$19.00	(\$1,336)	\$3,914
Meter Reread Charge	1	\$35.00	\$35	\$7.00	(\$28)	\$7
Reconnection Charge	150	\$35.00	\$5,250	\$11.00	(\$2,400)	\$2,850
Returned Check Charge	7	\$50.00	\$350	\$28.00	(\$280)	\$70
Total Other Water Revenues			\$19,670		(\$8,060)	\$11,610

¹³ Jonathan Creek District's Response to Staff's First Request, Item 7.

PRO FORMA OPERATING STATEMENT

Jonathan Creek District's Pro Forma Operating Statement for the test year ended December 31, 2021, as determined by Commission Staff, appears below.

	Tes	st Year	Ad	ljustment	Reference		Pro Forma
Operating Revenues							
Total Metered Sales	\$	964,443	\$	3,330	Α		\$ 967,773
Other Water Revenues							
Forfeited Discounts		-		9,103	В		
				7,027	С		16,130
Misc Service Revenues		30,865		(9,103)	В		
				(2,092)	С		
				(8,060)	С		11,610
Total Operating Revenues		995,308		205		_	995,513
Operating Expenses							
Operation and Maintenance Expenses							
Salaries and Wages - Employees		335,561		(23,136)	D		
				72,728	E		385,153
Salaries and Wages - Officers		-		23,136	D		
				1,064	D		24,200
Employee Pensions and Benefits		118,384		16,819	F		135,203
Purchased Power		60,689		(6,585)	G		54,104
Chemicals		10,119		(1,098)	G		9,021
Materials and Supplies		33,046					33,046
Contractual Services		32,810					32,810
Transportation Expenses		19,517					19,517
Insurance - Other		34,589					34,589
Miscellaenous Expenses		31,162				_	31,162
Total Operation and Mainenance Expenses		675,877		82,928		_	758,805
Depreciation Expense		160,664		1,689	Н		162,353
Taxes Other Than Income		25,176		7,839	Е	_	33,015
Total Operating Expenses		861,717		92,456		_	954,173
Utility Operating Income(Loss)	\$	133,591	\$	(92,251)			\$ 41,340

A. <u>Billing Analysis.</u> Jonathan Creek District included test-year service revenues of \$964,443. In its application, Jonathan Creek District proposed to increase test-year service revenue by \$3,330 to reflect its current Billing Analysis. Commission Staff agrees that the adjustment proposed by Jonathan Creek District is known and measurable and accurately reflects pro forma revenue and has included it in pro forma calculation.

B. <u>Incorrectly Recorded Penalty Revenue.</u> In its application, Jonathan Creek District proposed an adjustment to test year miscellaneous service revenue resulting in a decrease of \$9,103 to remove Forfeited Discount penalty revenue that was incorrectly reported as Miscellaneous Service revenue in the test year. In addition, Jonathan Creek District proposed an adjustment to increase Forfeited Discounts (Late Fee) by the same amount. Commission Staff agrees that the adjustment proposed by Jonathan Creek District is known and measurable and accurately reflects pro forma revenue.

C. <u>Forfeited Discounts & Nonrecurring Charges.</u> Jonathan Creek District reported \$9,103 of Late Fees in the test year. ¹⁵ Due to the moratorium regarding the collection of late payment fees due to the COVID-19 pandemic, Commission Staff believes that the Late Fee revenue from the test year is not representative of amounts that would normally be collected in an annual period. Following Commission precedent

¹⁴ Application, Schedule of Adjusted Operations, References, Adjustment B.

¹⁵ Application, Schedule of Adjusted Operations, References, Adjustment B.

of normalizing Late Fees to meet the three-year average,¹⁶ Commission Staff increased Late Fee revenue by \$7,027, as shown below.¹⁷

Late Fee Revenue	
2017	\$15,614
2018	\$19,759
2019	\$13,016
Average	<u>\$16,130</u>
Less 2021 Late Fee Revenue	\$ 9,103
Adjustment	\$ 7,027

As shown above, the adjustment to the Nonrecurring charges results in a decrease in Other Water Revenue of \$8,060. In addition, to normalize Miscellaneous Revenues to \$11,610, an adjustment of (\$2,092) was applied.

D. <u>Salaries and Wages – Officers.</u> In the application, Jonathan Creek District proposed an adjustment to reduce test year Salaries and Wages – Employees expense by \$23,136 and increase Salaries and Wages – Officers by the same amount, citing a bookkeeping error that resulted in the district recording Commissioner fees as employee salaries. Jonathan Creek District proposed an additional adjustment to increase Salaries and Wages – Officers by \$1,064 to accurately annualize Commissioner fees based on a full year of payments. Upon review, Commission Staff agrees that the adjustments proposed by Jonathan Creek District are known and measurable and accurately reflects pro forma expenses and have included them in the pro forma calculation.

¹⁶ Case No. 2021-00475, Electronic Application of Carroll County Water District No. 1 for an Adjustment of Rates Pursuant to 807 KAR 5:076 (Ky. PSC June 28, 2022).

¹⁷ Jonathan Creek District's Supplemental Information (filed Aug. 18, 2022).

¹⁸ Application, Schedule of Adjusted Operations, References Page. Adjustment C.

E. <u>Salaries and Wages – Employees & FICA</u>. After the adjustment discussed above, Jonathan Creek District's test year Salaries and Wages – Employees Expense was \$312,425. In its application, Jonathan Creek District proposed an adjustment increasing test-year Salaries and Wages – Employees Expense by \$41,528 as well as increasing FICA taxes by an associated \$3,600 citing the changes in staffing and salary levels since the test year. Subsequent to the filing of its application, Jonathan Creek District provided support showing the addition of a new operator trainee position. Upon calculating pro forma salary levels, including the new position, Commission Staff determined that Salaries and Wages – Employees Expense should be increased by \$72,728 as shown below.

Employee Title	Pro Forma Hours Worked	Pro Forma Overtime Hours	Pro Form Wage Rate			o Forma Wages
Superintendent	2230	388.25	\$	38.04	\$	106,983
Office Mgr/Bookkeeper	2080	120.23		22.00		49,728
Office Administrations	2080	69.13		20.00		43,674
Operator	1075.92	0		23.00		24,746
Operator	2338.61	123.19		24.00		60,561
Operator	2312	142.41		18.00		45,461
New Part Time Operator Trainee	2080	0		15.00		31,200
New Full Time Operator Trainee	1140	0		20.00		22,800
		Total Pro Forma S			385,153	
		Less: Test Year Expense				312,425
		Increase(Decreas	\$	72,728		

As a result of Commission Staff's increase to Salaries and Wages – Employees, Commission Staff has made an adjustment to reduce FICA Tax Expenses to reflect the adjusted payroll costs, as shown below.

Pro Forma FICA Applicable Salaries and Wages	\$ 409,353
Multiply by: FICA Rate	7.65%
Pro Forma FICA Taxes	31,316
Less: Test Year Payroll Taxes	(23,477)
Adjustment	\$ 7,839

F. <u>Employee Pensions and Benefits</u>. Jonathan Creek District included \$118,384 in test-year Employee Benefits Expense related to insurance and retirement benefits. As part of its employee compensation, Jonathan Creek District pays 100 percent its employees' health, dental, vision, and life insurance premiums.

Commission Staff notes that the Commission has consistently made ratemaking adjustments to reduce the cost of employer-sponsored healthcare paid by some utilities when certain aspects of those benefit packages were found to be unreasonable based on a review of total salaries and fringe benefits. The Commission continues to place greater emphasis on evaluating employees' total compensation packages, including both salary and benefits programs, for market and geographic competitiveness to ensure the development of a fair, just and reasonable rate.¹⁹

As Jonathan Creek District's employees currently pay zero percent of their health insurance premiums, Commission Staff has calculated the total pro forma allowable premiums, shown below.

	Cor	ntribution	Contribution Rate	Adj	ustment	Con	tributions
Health (Employee)	\$	2,908	22%	\$	(640)	\$	2,268
Life		190	0%		-		190
Dental		232	60%		(139)		93
Vision		66	0%		-		66
			Pro Forma Allowable Multiply by: 12 Month	•	emiums	\$	2,617 12
			Pro Forma Allowable	Premiums		\$	31,404

¹⁹ Case 2020-00167, Electronic Application of Ohio County Utilities District for an Alternative Rate Adjustment (Ky. PSC Dec. 2, 2020). Case No. 2020-00296, Electronic Application of Allen County Utilities District for an Alternative Rate Adjustment (Ky. PSC Feb. 3, 2021).

In addition to health and life insurance, Jonathan Creek District employees participate in Kentucky's County Employee Retirement System (CERS). As part of CERS, Jonathan Creek District makes contributions to employee's retirement account based on annual salaries and wages. Using the pro forma Salaries and Wages – Employees Expense discussed above, Commission Staff normalized annual contributions using the CERS rate effective July 1, 2021, of 26.95 percent as shown below.

Pro Forma Applicable Salaries and Wages	\$ 385,153
Multiply By: Pro Forma CERS Contribution Rate	 26.95%
Pro Forma CERS Contributions	\$ 103,799

Considering both adjustments discussed above, Commission Staff calculated proforma Employee Benefits Expense should be increased by \$16,819 as shown below.

Pro Forma Health & Dental Insurance Benefits	\$ 31,404
Pro Forma CERS Contributions	103,799
	 _
Pro Forma Health, Dental, and Pension Benefits	135,203
Less: Test Year Pensions and Benefits	(118,384)
Adjustment	\$ 16,819

G. <u>Water Loss.</u> In its application, Jonathan Creek District proposed adjustments to Purchased Power and Purchased Chemicals Expense of \$6,587 and \$1,098 respectively, to account for the district's unaccounted-for water loss in excess of 15 percent. Commission Staff agrees that such adjustments are appropriate, but also notes that the reduction to Purchased Power expense should total \$6,585, as shown below.

	Purchased	Purchased	
	Power	Chemical	Total
2021 Pro Forma Expenses	\$ 60,689	\$ 10,119	\$ 70,808
Multiplied by: Total Water Loss	10.85%	10.85%	10.85%
Excess Cost	\$ 6,585	\$ 1,098	\$ 7,683

H. <u>Depreciation Expense</u>. In its application, Jonathan Creek District included \$160,664 in Depreciation Expense and proposed to increase test-year Depreciation Expense by \$1,689 citing Commission precedent of evaluating the reasonableness of the depreciation practices of small water utilities using the National Association of Regulatory Utility Commissioners' (NARUC) report titled *Depreciation Practices for Small Utilities* (NARUC Study) published in 1979. When no evidence exists to support a specific life that is outside the NARUC ranges, the Commission has historically used the midpoint of the NARUC ranges to depreciate the utility plant.

Upon examination, Commission Staff agrees that the adjustment proposed by Jonathan Creek District is known and measurable and accurately reflects adjusting Jonathan Creek District's assets' useful life to the midpoint of the life's found in the NARUC Study and has included it in pro forma operations.

OVERALL REVENUE REQUIREMENT AND REQUIRED REVENUE INCREASE

By applying the Operating Ratio Method, as generally accepted by the Commission, Commission Staff found Jonathan Creek District's Overall Revenue Requirement to be \$1,090,743. A revenue increase of \$91,529, or 9.46 percent, is necessary to generate the Overall Revenue Requirement.

The operating ratio methodology²⁰ is used when there is no basis for a rate-of-return determination, the cost of the utility has fully or largely been funded through contributions, or there is little or no outstanding long-term debt. Commission Staff is of the opinion that an operating ratio of 88 percent will allow Jonathan Creek District sufficient revenues to cover its reasonable operating expenses and provide for reasonable equity growth and is appropriate, as the district's only outstanding debt has maturity date of 2024.

		Jo	onathan Creek Water	С	ommission Staff
Operating Exp	penses	\$	897,011	\$	954,173
Divide by:	Operating Ratio		88%		88%
			1,019,331		1,084,287
Plus:	Interest Expense		6,456		6,456
Overall Reven	ue Requirement		1,025,787		1,090,743
Less:	Other Operating Revenue		(30,865)		(27,740)
	Interest Income		(384)		(384)
	Nonutility Income		(3,317)		(3,317)
Revenue Requ	uirement - Water Rates		991,221		1,059,302
Less:	Normalized Revenue from Service		(967,773)		(967,773)
Required Rev	enue Increase	\$	23,448	\$	91,529
Percentage In	crease		2.42%		9.46%

Operating Ratio = Operating Expenses + Depreciation + Taxes

Gross Revenues

²⁰ Operating Ratio is defined as the ratio of expenses, including depreciation and taxes, to gross revenues. It is illustrated by the following equation:

Signatures

/s/ Travis Leach_____ Prepared by: Travis Leach Revenue Requirement Branch Division of Financial Analysis

/s/ Eddie Beavers_

Prepared by: Eddie Beavers Rate Design Branch Division of Financial Analysis

APPENDIX

APPENDIX TO COMMISSION STAFF'S REPORT OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2021-00410 DATED SEP 23 2022

The following rates and charges are prescribed for the customers in the area served by Jonathan Creek Water District. All other rates and charges not specifically mentioned herein shall remain the same as those in effect under the authority of the Commission prior to the effective date of this Order.

Monthly Water Rates

Customer Charge		
5/8- x 3/4-Inch Meter	\$7.62	Minimum Bill
1-Inch Meter	\$14.72	Minimum Bill
1 1/2-Inch Meter	\$26.59	Minimum Bill
2-Inch Meter	\$40.81	Minimum Bill
3-Inch Meter	\$74.01	Minimum Bill
6-Inch Meter	\$239.96	Minimum Bill

All Usage 0.00716 Per Gallon

Nonrecurring Charges

Connection/Turn On Charge	\$19.00
Disconnection Charge	\$19.00
Field Collection Charge	\$19.00
Meter Reinstallation Charge	\$19.00
Meter Reread Charge	\$7.00
5/8" x 3/4" Meter Test Charge	\$54.00
1" Meter Test Charge	\$89.00
1 1/2" Meter Test Charge	\$89.00
2" Meter Test Charge	\$119.00
Field Meter Test Charge (2",3" and 4")	\$369.00
Reconnection Charge	\$19.00
Return Check Charge	\$10.00

*Alan Vilines Kentucky Rural Water Association Post Office Box 1424 1151 Old Porter Pike Bowling Green, KENTUCKY 42102-1424

*Jonathan Creek Water District 7564 U. S. Highway 68E P. O. Box 414 Benton, KY 42025

*Jonathan Creek Water District Jonathan Creek Water District 7564 U. S. Highway 68E P. O. Box 414 Benton, KY 42025

*Jennifer Miller Jonathan Creek Water District 7564 U. S. Highway 68E P. O. Box 414 Benton, KY 42025