

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST LAUREL)	CASE NO.
WATER DISTRICT FOR A RATE ADJUSTMENT)	2023-00130
PURSUANT TO 807 KAR 5:076)	

NOTICE OF FILING OF COMMISSION STAFF'S REPORT

Notice is hereby given that, in accordance with the Commission's Order of May 15, 2023, 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 May 15, 2023 Order, East Laurel Water District (East Laurel District) is required to file written comments regarding the findings of Commission Staff no later than 14 days from the date of service of this report. The Commission directs East Laurel 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 SEP 15 2023

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).

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COMMISSION STAFF'S REPORT
ON EAST LAUREL WATER DISTRICT

East Laurel Water District (East Laurel 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 5,294 residential customers and 252 commercial customers in Laurel County, Kentucky.¹

On April 24, 2023, East Laurel District filed its application with the Commission requesting an adjustment to its water rates pursuant to 807 KAR 5:076. To comply with the requirements of 807 KAR 5:076, Section 9,² East Laurel District used the calendar year ended December 31, 2021, as the basis for its application. East Laurel District's 2022 Annual Report was not filed until July 11, 2023. The application was filed pursuant to the Commission's Order in Case No. 2023-00077, which required East Laurel District to file an application for an adjustment of its base rates by September 1, 2024.³ East

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

² 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.

³ Case No. 2023-00077, *Electronic Purchased Water Adjustment Filing of East Laurel Water District* (Ky. PSC Apr. 5, 2023), Order at 6.

Laurel District’s last base rate increase pursuant to the alternative rate filing procedure was in Case No. 2005-00476.⁴ Since that matter, East Laurel District has only adjusted its rates pursuant to purchased water adjustments, financing approval, or in conjunction with an application for a Certificate of Public Convenience and Necessity. To ensure the orderly review of the application, the Commission established a procedural schedule by Order dated May 15, 2023.⁵ East Laurel District responded to two discovery requests from Commission Staff.⁶

WATER LOSS

The Commission notes that in its 2021 Annual Report, East Laurel District reported a water loss of 13.6159 percent.⁷ Commission regulation 807 KAR 5:066, Section 6(3), states that for ratemaking purposes, a utility's water loss shall not exceed 15 percent of total water produced and purchased, excluding water consumed by a utility in its own operations. The table below shows that the 2021 total annual cost of water loss to East Laurel District is \$250,255.

	<u>Purchased Water</u>	<u>Purchased Power</u>	<u>Total</u>
Pro Forma Purchases	\$ 1,791,200	\$ 46,763	\$ 1,837,963
Water Loss Percent	13.6159%	13.6159%	
Total Water Loss	<u>\$ 243,888</u>	<u>\$ 6,367</u>	<u>\$ 250,255</u>

⁴ Case No. 2005-00476 *Approval of a Proposed Increase in Rates for Water Service Filing of East Laurel Water District* (Ky. PSC July 12, 2006).

⁵ Order (Ky. PSC May 15, 2023), Appendix A.

⁶ East Laurel District’s Response to Commission’s First Request for Information (Staff’s First Request) (filed June 27, 2023). East Laurel District’s Response to Commission Staff’s Second Request for Information (Staff’s Second Request) (filed July 25, 2023).

⁷ 2021 Annual Report at 57.

DISCUSSION

Using its pro forma test-year operations, East Laurel District determined that a base rate revenue increase of \$442,111, or 15.09 percent, was necessary to achieve the revenue requirement as shown in the table below.⁸

Pro Forma Operating Expenses	\$ 3,281,818
Plus: Average Annual Principal and Interest Payments	168,189
Additional Working Capital	<u>33,638</u>
Overall Revenue Requirement	3,483,645
Less: Other Operating Revenue	(110,548)
Interest Income	<u>(1,274)</u>
Revenue Required from Sales of Water	3,371,823
Less: Revenue from Sales at Present Rates	<u>(2,929,712)</u>
Required Revenue Increase	<u>\$ 442,111</u>
Percentage Increase	<u>15.09%</u>

To determine the reasonableness of the rates requested by East Laurel District, Commission Staff performed a limited review of East Laurel 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 measurable⁹ changes to test-year operations were identified, and adjustments were made

⁸ Application, Attachment 4, Revenue Requirements.

⁹ 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, *Application of Hardin County Water 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 Water 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).

when their effects were deemed material. Insignificant and immaterial discrepancies were not necessarily pursued or addressed.

Commission Staff's findings are summarized in this report. Noah Abner reviewed the calculation of East Laurel District's Overall Revenue Requirement, and Jason Green reviewed East Laurel District's reported revenues and rate design.

SUMMARY OF REVENUES AND EXPENSES

1. Overall Revenue Requirement and Required Revenue Increase. By applying the Debt Service Coverage (DSC) method, as generally accepted by the Commission, Commission Staff found that East Laurel District's required revenue from water sales is \$3,352,451 to meet the Overall Revenue Requirement of \$3,481,062 and that a \$422,739 revenue increase, or 14.43 percent, to pro forma present rate revenues is necessary to generate the Overall Revenue Requirement.

2. Monthly Water Service Rates. Based upon the revenue requirement, East Laurel District proposed to increase all of its monthly retail water service rates evenly across the board. East Laurel District did not perform a cost-of-service study (COSS).¹⁰ East Laurel District stated that it did not complete a COSS at this time, as there has not been any material change in the water system to warrant a COSS.¹¹

The Commission has previously found that the allocation of a revenue adjustment 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

¹⁰ East Laurel District's Response to Staff's First Request, Item 20.

¹¹ East Laurel District's Response to Staff's First Request, Item 23.

followed the method proposed by East Laurel District and allocated the \$422,739 revenue increase across the board to East Laurel District's monthly retail and wholesale water service rates.

The rates set forth in Appendix B 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 \$3,352,451 Revenue Required from Water Sales, an approximate 14.43 percent increase. These rates will increase a typical retail residential customer's monthly water bill from \$38.75¹² to \$44.35, an increase of \$5.60, or approximately 14.45 percent. Commission Staff's proposed rates are \$0.24 or 0.54 percent less than East Laurel District's proposed rates for an average residential user.

3. Nonrecurring Charges. East Laurel District provided updated cost justification for all the Nonrecurring Charges listed in its tariff.¹³ Commission Staff reviewed the cost justification information provided by East Laurel District. Wood Creek Water District (Wood Creek District) is responsible for performing East Laurel District's Nonrecurring Charge work and charges a fee for its service. As such, East Laurel District did not assign any utility labor costs to its nonrecurring charges. East Laurel District stated that Wood Creek District has increased its charge to \$33.41 for services performed during normal business hours and \$66.82 for service performed after business hours. In addition, the cost revisions provided by East Laurel included updating and increasing the amount for transportation to \$24.24 for all Nonrecurring Charges that include transportation expense in its calculations. East Laurel provided the billing invoices from

¹² Application, Attachment 1, Customer Notice, typical residential customer uses approximately 4,000 gallons per month.

¹³ East Laurel District's Response to Staff's First Request, Item 17.

Wood Creek District for these charges. East Laurel District did not provide any cost justification for its Returned Check Charge so Commission Staff reduced the charge to zero. For the remaining nonrecurring charges, Commission Staff agrees East Laurel District's proposed adjustments meet the ratemaking criteria of being known and measurable. The breakdown of cost for each nonrecurring charge and any Commission Staff adjustment can be found in Appendix A.

The adjustments to the Nonrecurring Charges results in a decrease in Other Operating Revenue of \$14,102 as shown below.

Description	Occurrences	Current Charge	Revised Charge	Adjustment	Pro Forma
Service Reconnection	1,067	\$40.00	\$57.00	\$18,139	\$60,819
Reconnection Charge (After Hours)	0	\$80.00	\$91.00	\$0	\$0
Returned Check Charge	54	\$25.00	\$0.00	-\$1,350	\$0
Meter Test Charge	0	\$25.00	\$91.00	\$0	\$0
Service Call/Investigation	0	\$40.00	\$57.00	\$0	\$0
Service Line Inspection	0	\$20.00	\$57.00	\$0	\$0
Pro Forma Test Year NRC Revenue				<u>\$16,789</u>	\$60,819
Test Year NRC Revenue ()					(44,030)
Adjustment					<u>\$16,789</u>

Additionally, East Laurel District proposes to increase its tap-on fees for 5/8-Inch x 3/4-Inch meters. The cost justification form provided by East Laurel District results in a tap-on fee for 5/8-Inch x 3/4-Inch meters of \$1,778. Commission Staff concurs with East Laurel District's proposed increase to its tap-on fees.

PRO FORMA OPERATING STATEMENT

East Laurel District's Pro Forma Operating Statement for the test year ended December 31, 2021, as determined by Staff appears in the table below.

	Test Year	East Laurel District Proposed Adjustments	Commission Staff Adjustments	Total Adjustments	(Ref.)	Pro Forma
<u>Operating Revenues</u>						
Total Retail Sales	2,823,264	17,794		17,794	(A)	2,841,058
Sales for Resale	85,521	3,133		3,133	(A)	88,654
Other Water Revenues:						
Late Payment Penalties	0	66,519		66,519	(B)	66,519
Misc. Service Revenues	125,912	(66,519)		(66,519)	(B)	
		(15,364)		(15,364)	(C)	
			16,789	16,789	(D)	60,818
Total Operating Revenues	3,034,697	5,563	16,789	22,352		3,057,049
<u>Operating Expenses</u>						
Operation and Maintenance Expenses						
Salaries and Wages - Commissioners	0	18,000	(2,400)	15,600	(E)	15,600
Purchased Water	1,735,385	55,815		55,815	(F)	1,791,200
Purchased Power for Pumping	46,763			0		46,763
Materials and Supplies	245,331			0		245,331
Contractual Services - Acct. & Legal	10,351			0		10,351
Contractual Services	821,744			0		821,744
Insurance - Gen. Liability	11,337			0		11,337
Bad Debt Expense	56,212			0		56,212
Miscellaneous Expense	36,392	(18,000)		(18,000)	(E)	18,392
Total Operation and Maintenance Expenses	2,963,515	55,815	(2,400)	53,415		3,016,930
Depreciation Expense	235,444	9,772		9,772	(G)	245,216
Amortization Expense	10,155			0		10,155
Taxes Other Than Income	7,118		(184)	(184)	(E)	6,934
Total Operating Expenses	3,216,232	65,587	(2,584)	63,003		3,279,235
Net Operating Income	(181,535)	(60,024)	19,373	(40,651)		(222,186)
Interest Income	1,274			0		1,274
Income Available to Service Debt	(180,261)	(60,024)	19,373	(40,651)		(220,912)

(A) Billing Analysis. East Laurel District proposed to increase total retail sales for the test period by \$17,794 to reflect the amount of revenue collected from retail customers. East Laurel District also proposed to increase sales for resale for the test period by \$3,133 to reflect the amount of revenue collected from its wholesale customers. In the 2021 Annual Report, total metered water sales revenue reported for the test year is \$2,823,264 from retail and \$85,521 from sales for resale.¹⁴ East Laurel District provided a billing analysis listing the water usage and water sales revenue for the twelve-

¹⁴ 2021 Annual Report at 49, Total Retail Sales \$2,823,264, Sales for Resale \$85,521.

month test year in its application. East Laurel District's billing analysis was used to calculate a normalized revenue amount based on the usage during the test year using the rates authorized in its current tariff. This results in a normalized revenue from retail sales of \$2,841,058 and normalized revenue from sales for resale of \$88,654. Commission Staff concurs with East Laurel District that it is proper to increase test-year water sales revenue from retail and wholesale by these amounts to reflect the revenues from water rates generated by the billing analysis.

(B) Late Payment Penalties. Late payment penalties are established in the tariff at 10 percent of the bill for amounts not paid by the 15th of the month.¹⁵ In its application East Laurel District proposed a reclassification of \$66,519 from Miscellaneous Service Revenue to Late Payment Penalties stating that Late Payment Penalties in the test year were incorrectly reported with Miscellaneous Service Revenue.¹⁶ After review of East Laurel District's 2021 general ledger Commission Staff agrees with the reclassification of the \$66,519 to Late Payment Penalties.¹⁷

(C) Capital Contribution. In its application East Laurel District proposed a \$15,346 decrease to Miscellaneous Service revenue to reflect \$15,346 in capital contribution for water line extensions from Laurel County Fiscal Court that was included with Miscellaneous Service Revenues.¹⁸ After review of East Laurel District's 2021

¹⁵ P.S.C. Ky. No. 1st Revised Sheet No. 1 (issued Apr. 24, 2023), effective Mar. 1, 2023.

¹⁶ Application, Attachment 5, Schedule of Adjusted Operations, Adjustment B.

¹⁷ East Laurel District's Response to Staff's First Request, Item 1, EL1_1-GL_2021.xls.

¹⁸ Application, Attachment 5, Schedule of Adjusted Operations, Adjustment C.

general ledger, Commission Staff agrees with the \$15,346 decrease to Miscellaneous Service revenue.¹⁹

(D) Nonrecurring Charges. As discussed in the Nonrecurring Charges section above, the adjustments to the nonrecurring charges result in an increase in Miscellaneous Service Revenues of \$16,789.

(E) Salaries and Wages - Commissioners. In its application East Laurel District proposed an \$18,000 reclassification of Miscellaneous Expense to Salaries and Wages – Commissioners.²⁰ Commission Staff reviewed East Laurel District's Commissioners Salary and noted that Commissioner Bobby Anders had not attended training in 2021 or 2022 and is not eligible to receive the full \$6,000 yearly salary according to KRS 74.020(6); rather the commissioner is entitled to an annual compensation of \$3,600. Commission Staff reduced Salaries and Wages – Commissioners by \$2,400 and Taxes Other Than Income by \$184 as show in the chart below.

Name	East Laurel District		Training	Commission Staff		Difference
	Monthly Salary	Yearly Salary		Monthly Salary	Yearly Salary	
Bobby Anders	\$ 500	\$ 6,000	No	\$ 300	\$ 3,600	\$ (2,400)
Dennis Minton	500	6,000	Yes	500	6,000	0
Deverle Humfleet / John Douglas Day	500	6,000	Yes	500	6,000	0
Totals		<u>\$ 18,000</u>			<u>\$ 15,600</u>	<u>\$ (2,400)</u>
FICA at 7.65%		<u>\$ 1,377</u>			<u>\$ 1,193</u>	<u>(184)</u>

(F) Purchased Water. In its application East Laurel District proposed an increase of \$55,815 to Purchased Water expense to reflect Wood Creek District

¹⁹ East Laurel District's Response to Staff's First Request, Item 1, EL1_1-GL_2021.xls.

²⁰ Application, Attachment 4, Schedule of Adjusted Operations, Adjustment D.

increasing their wholesale water rates since the test year.²¹ Commission Staff reviewed East Laurel District's calculations and evidence²² provided and agrees that the proposed adjustment meets the ratemaking criteria of being known and measurable and Commission Staff included the increase in its pro forma operating expenses.

(G) Depreciation. In its application, East Laurel District reported a test year Depreciation expense of \$235,444.²³ East Laurel District proposed an increase of \$9,772 to Depreciation expense to reflect adjustments of asset service lives to the midpoint of service life range set forth in the National Association of Regulatory Utility Commissioners (NARUC) publication titled, Depreciation Practices for Small Water Utilities (NARUC Study).²⁴ To evaluate the reasonableness of the depreciation practices of small water utilities, the Commission has historically relied upon the NARUC Study. 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. In this proceeding, Commission Staff found no evidence to support depreciable lives that vary significantly from the midpoint of the NARUC ranges. Therefore, Commission Staff agrees with East Laurel District's proposed adjustment and increased pro forma Depreciation expense \$9,772 accordingly.

²¹ Case No. 2023-00077, *Electronic Purchased Water Adjustment Filing of East Laurel Water District* (Ky. PSC Apr. 5, 2023).

²² East Laurel District's Response to Staff's First Request, Item 9, E1_9-Adjustments.xlsx.

²³ Application, Attachment 4, Schedule of Adjusted Operations.

²⁴ Application, Attachment 4, Schedule of Adjusted Operations, Adjustment F.

OVERALL REVENUE REQUIREMENT AND
REQUIRED REVENUE INCREASE

The Commission has historically applied a Debt Service Coverage (DSC) method to calculate the Overall Revenue Requirement of water districts and water associations. This method allows for recovery of (1) cash-related pro forma operating expenses; (2) recovery of depreciation expense, a noncash item, to provide working capital;²⁵ 3) the average annual principal and interest payments on all long-term debts; and (4) working capital in addition to depreciation expense.

	East Laurel District	Commission Staff	
Pro Forma Operating Expenses	\$ 3,281,818	\$ 3,279,235	
Plus: Average Annual Principal and Interest Payments	168,189	168,189	(1)
Additional Working Capital	33,638	33,638	(2)
Overall Revenue Requirement	3,483,645	3,481,062	
Less: Other Operating Revenue	(110,548)	(127,337)	
Interest Income	(1,274)	(1,274)	
Revenue Required from Sales of Water	3,371,823	3,352,451	
Less: Revenue from Sales at Present Rates	(2,929,712)	(2,929,712)	
Required Revenue Increase	<u>\$ 442,111</u>	<u>\$ 422,739</u>	
Percentage Increase	<u>15.09%</u>	<u>14.43%</u>	

1. Average Annual Principal and Interest Payments. In its application, East Laurel District reported a loan from Kentucky Rural Water Finance Corporation and a loan

²⁵ The Kentucky Supreme Court has held that the Commission must permit a water district to recover its depreciation expense through its rates for service to provide internal funds for renewing and replacing assets. *Public Serv. Comm'n of Kentucky v. Dewitt Water Dist.*, 720 S.W.2d 725, 728 (Ky. 1986). Although a water district's lenders require that a small portion of the depreciation funds be deposited annually into a debt reserve/depreciation fund until the account's balance accumulates to a required threshold, neither the Commission nor the Court requires that revenues collected for depreciation be accounted for separately from the water district's general funds or that depreciation funds be used only for asset renewal and replacement. The Commission has recognized that the working capital provided through recovery of depreciation expense may be used for purposes other than renewal and replacement of assets. See Case No. 2012-00309, *Application of Southern Water and Sewer District for an Adjustment in Rates Pursuant to the Alternative Rate Filing Procedure for Small Utilities* (Ky. PSC Dec. 21, 2012).

from the U.S. Department of Agriculture Rural Development (RD).²⁶ East Laurel District requested recovery of the average annual principal and interest on its indebtedness based on a five-year average of the annual principal, and interest and fee payments for the years 2023 through 2027 of \$168,189.²⁷ Commission Staff agrees with East Laurel District's average annual principal and interest for use in the revenue requirement given the information above.

2. Additional Working Capital. The DSC method, as historically applied by the Commission, includes an allowance for additional working capital that is equal to the minimum net revenues required by a district's lenders that are above its average annual debt payments. In its application East Laurel District, requested recovery of an allowance for working capital that is equal to 120 percent of its average annual debt payments.²⁸ RD requires that East Laurel District charge rates that produce net revenues that are at least 120 percent of its average annual debt payments. Following the Commission's historic practice of including additional working capital, \$33,638 is included in the revenue requirement.

²⁶ Application, Attachment 8, Debt Instruments.

²⁷ Application, Attachment 4, Debt Service Schedule.

²⁸ Application, Attachment 4, Revenue Requirements.

Signatures

/s/ Noah Abner

Prepared by: Noah Abner
Revenue Requirement Branch
Division of Financial Analysis

/s/ Jason Green

Prepared by: Jason Green
Rate Design Branch
Division of Financial Analysis

APPENDIX A

APPENDIX TO COMMISSION STAFF'S REPORT OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2023-00130 DATED SEP 15 2023

* Denotes Rounding

Nonrecurring Charges Adjustments

Reconnection Charge	
	Utility Revised Charge
Transportation	\$ 24.24
Misc.	\$ 33.41
Total Revised Charge *	\$ 57.00
Current Rate	\$ 40.00

Service Call	
	Utility Revised Charge
Transportation	\$ 24.24
Misc.	\$ 33.41
Total Revised Charge *	\$ 57.00
Current Rate	\$ 40.00

Service Inspection	
	Utility Revised Charge
Transportation	\$ 24.24
Misc.	\$ 33.41
Total Revised Charge *	\$ 57.00
Current Rate	\$ 20.00

Meter Test Charge	
	Utility Revised Charge
Transportation	\$ 24.24
Misc.	\$ 66.82
Total Revised Charge *	\$ 91.00
Current Rate	\$ 25.00

Returned Check Charge	
	Utility Revised Charge
Field Materials	
Field Labor	
Office Supplies	

Office Labor		
Transportation		
Misc.		
Total Revised Charge		<u>\$0.00</u>
Current Rate	\$	25.00
Reconnection Charge (After Hours)		
		Utility Revised Charge
Transportation	\$	24.24
Misc.	\$	66.82
Total Revised Charge *	\$	<u>91.00</u>
Current Rate	\$	80.00

APPENDIX B

APPENDIX TO COMMISSION STAFF'S REPORT OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2023-00130 DATED SEP 15 2023

The following rates and charges are prescribed for the customers in the area served by East Laurel 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 Retail Rates

5/8-Inch x 3/4-Inch Meter

First	2,000 Gallons	\$	24.73	Minimum Bill
Next	2,000 Gallons		0.00981	per Gallon
Next	2,000 Gallons		0.00953	per Gallon
Next	4,000 Gallons		0.00864	per Gallon
Over	10,000 Gallons		0.00790	per Gallon

1-Inch Meter

First	6,000 Gallons	\$	63.41	Minimum Bill
Next	4,000 Gallons	\$	0.00864	per Gallon
Over	10,000 Gallons	\$	0.00790	per Gallon

2-Inch Meter

First	20,000 Gallons	\$	176.92	Minimum Bill
Over	20,000 Gallons	\$	0.00790	per Gallon

3-Inch Meter

First	30,000 Gallons	\$	255.88	Minimum Bill
Over	30,000 Gallons	\$	0.00790	per Gallon

Wholesale Rate

\$	0.00580	per Gallon
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Tap-On Fee

5/8-Inch x 3/4-Inch Meter	\$	1,778.00
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Nonrecurring Charges

Reconnection Charge	\$	57.00
Reconnection Charge (After Hours)		91.00
Service Call		57.00
Inspection Charge		57.00
Meter Test		91.00

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