

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

|                                |   |                            |
|--------------------------------|---|----------------------------|
|                                | ) |                            |
| <b>BRITTANY KINCAID</b>        | ) |                            |
|                                | ) |                            |
| <b>COMPLAINANT</b>             | ) |                            |
| <b>V.</b>                      | ) | <b>CASE NO. 2026-00111</b> |
|                                | ) |                            |
| <b>FARMDALE WATER DISTRICT</b> | ) |                            |
|                                | ) |                            |
| <b>DEFENDANT</b>               | ) |                            |
|                                | ) |                            |

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**COMPLAINANT'S REPLY TO DEFENDANT'S ANSWER AND OBJECTION TO  
SATISFACTION**

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Complainant, Brittany Kincaid, respectfully submits this Reply to Farmdale Water District's ("Farmdale") Answer and Satisfaction. Complainant respectfully requests that the Commission reject Farmdale's assertion that the Complaint has been satisfied in full, deny the Motion to Dismiss, and order the matter to remain open until systemic administrative and transparency remedies are permanently mandated.

**I. THE COMPLAINT IS NOT SATISFIED BY A DISCRETIONARY TEMPORARY CREDIT**

While Defendant asserts that adjusting the March 25, 2026 bill to a zero balance satisfies the dispute, this action merely provides an isolated financial accommodation. It completely fails to remedy the underlying administrative vulnerabilities that triggered the error. Complainant initiated this proceeding not merely to seek a temporary financial correction, but to address systemic structural defects in Farmdale's billing infrastructure, accounting methods, and regulatory disclosure policies. Dismissing this action leaves Complainant exposed to future systemic data failures.

## II. NEW AUTOMATED BASELINES EXPOSE THE IMPOSSIBILITY OF THE DISPUTED MARCH SPIKE

Complainant notes that since the activation of the Smart Point transceiver, the utility has successfully stabilized its billing cycles to true, consistent monthly reads taken on the 1st of each month. Following the initial partial cycle from April 8, 2026 (installation date) to May 1, 2026 which spanned 24 days and registered a stable 1,800 gallons, the subsequent full 31-day cycle ending June 1, 2026, registered a normal baseline of 2,400 gallons. Complainant's manual photograph from June 27, 2026, at 9:12 PM read 27,575 gallons, proving that the households actual consumption tracks perfectly with this 75-to-78 gallon per day average. However, this newly stabilized automated data completely collapses the Defendant's primary defense regarding the previous March 25, 2026 statement. Defendant argues that the 7,400-gallon spike on that bill was not an error, but was instead actual volume consumed during winter months when snow and ice prevented manual meter access. Attempting to treat the March bill as a routine "catch up" for an under-estimated February cycle.

Defendant's counsel explicitly confirmed in writing that the account showed "no signs of a leak of any type." Because there was only a single estimated billing cycle between the January 9 and March 4 actual readings, the total combined volume billed across that 54-day window equals 9,031 gallons (the 1,631 February estimate plus the 7,400 March statement). Even when dividing this total to evaluate it under a "catch-up" framework, it yields a two-month average of 4,515 gallons per month. This average is nearly double the verified 2,400-gallon consumption ceiling established by the new, active Smart Point electronic equipment for a 31-day summer month.

It is a physical and logical impossibility for a non-leaking household to silently and suddenly consume double its normal volume for 54 days, only to instantly and permanently return to its precise 75-to-78 gallon per day average the exact month automated electronic equipment is activated. Given the severe winter conditions cited by Defendant, the physical advancement of the manual meter register prior to April 8 is indicative of a well-documented distribution network malfunction: a severe air or pressure surge within the mains. Trapped compressed air pockets caused by winter main maintenance or pressure fluctuations rush through positive displacement meters at extreme velocity, rapidly spinning mechanical dials without delivering actual water.

### III. DEFENDANT ADMITS COMPLIANCE FAILURES REGARDING METRIC TRANSPARENCY

In its Answer, Defendant explicitly concedes that it utilizes an abbreviated “three-digit shorthand” data collection protocol that reads exclusively to the “100s of gallons,” completely truncates single-gallon values, and omits explicit conversion notations from consumer statements. Complainant’s manual photograph taken at 5:59 PM on June 1, 2026, read exactly 25,589 gallons, while the utility’s ledger registered a shorthand index of “256” (representing 25,600 gallons). While the automated system may reconcile these numbers by midnight, dropping single-gallon data from invoices masks the relationship between the physical meter odometer and the billed statement. Under 807 KAR 5:006, Section 7(4), registration of each meter must read in the same units used for billing unless a clear conversion factor is shown on the form. Furthermore, by withholding all daily/hourly Smart Point data logs processed after May 1, 2026, Defendant has restricted Complainant’s ability to verify its transmission history, forcing an active reliance on manual tracking to police the account.

PRAYER FOR RELIEF

Wherefore, Complainant respectfully requests that the Commission:

1. Deny Defendant's motion to find the Complaint satisfied and refuse to dismiss Case No. 2026-00111;
2. Order that the March 2026 balance adjustment to \$0.00 remain permanent, absolute and legally protected from any future retroactive "catch up" or deferred charges;
3. Direct Farmdale Water District to bring statement layout into full compliance with 807 KAR 5:006 by displaying explicit 5-digit accuracy data or clearly declaring all applicable unit tracking parameters on the face of consumer bills;
4. Direct Farmdale Water District to provide Complainant with full, unedited access to past and future hourly Smart Point transceiver data logs upon request to ensure consumer verification parity; and
5. Maintain active supervisory jurisdiction over this matter until these system-wide transparency adjustments are completed and verified in writing.

Dated this 28th day of June, 2026.

Respectfully submitted,

/s/Brittany Kincaid

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