

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

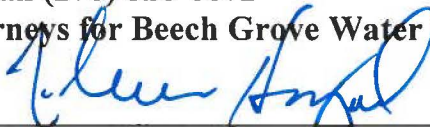
**ELECTRONIC ALLEGED FAILURE OF BEECH
GROVE WATER SYSTEM, INC. AND ITS
OFFICERS, NATHAN WARD, CHAD MCMAHON,
GREG CHEATHAM, GREG DANT, AND
ITS MANAGER, SHEILA MURPHY, TO
COMPLY WITH A COMMISSION
ORDER, KRS 278.990**

CASE NO. 2021-00349

NOTICE OF FILING

Comes **BEECH GROVE WATER SYSTEM, INC.** (“BGWS”), by counsel, pursuant to the Order of October 18, 2021, submits the attached individual responses of: Sheila Murphy and Directors: Nathan Ward, Greg Dant, Chad McMahon, and Greg Cheatham. The undersigned counsel has contacted a rate consultant who is scheduled to submit a fee proposal for a general or alternate filing rate case. The undersigned counsel anticipates this consultant’s proposal being approved at the November 2021, meeting of BGWS, and upon approval, the work for the general or alternative rate filing will commence.

DORSEY, GRAY, NORMENT & HOPGOOD
318 Second Street
Henderson, KY 42420
Telephone (270) 826-3965
Telefax (270) 826-6672
Attorneys for Beech Grove Water Systems, Inc.



J. Christopher Hopgood
chopgood@dkgnlaw.com

CERTIFICATE OF SERVICE

The foregoing was served by electronic mail of a true and correct copy of same to the following on this 29th day of October, 2021:

Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601



counsel for Beech Grove Water Systems, Inc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC ALLEGED FAILURE OF)
BEECH GROVE WATER SYSTEM, INC.)
AND ITS OFFICERS, NATHAN WARD,)
CHAD McMAHON, GREG CHEATHAM,)
GREG DANT, AND ITS MANAGER,)
SHEILA MURPHY, TO COMPLY WITH) Case No. 2021-000349
A COMMISSION ORDER, KRS 278.990)**

VERIFIED RESPONSE OF
SHEILA MURPHY

Respondent **SHEILA MURPHY** for her response to the Commission's order of October 18, 2021, states as follows:

1. I am the manager of the Beech Grove Water System, Inc. (BGWS) and have been since 2009.
2. I overlooked the directive in the order of June 9, 2020, in Case No. 2020-0056. I did not willfully disobey the order of the Commission. The failure to file was due to oversight and was not an attempt to ignore the order of the Commission. As mitigating factors, it is important to note that BGWS is a small water distribution

corporation. I am the only office. My board of directors are volunteers who are busy farmers, workers, retired workers or small business people.

3. BGWS intends to rectify the failure to file by promptly beginning to put together an alternate rate filing. BGWS has engaged counsel who has reached out to a reputable consultant to assist with this. I did undergo a knee replacement in May 2021 but I have been back to work since shortly thereafter and this alternate rate filing will take priority over any and all other tasks I have.

Sheila Murphy
SHEILA MURPHY
DATE: 10-29-2021

STATE OF KENTUCKY
COUNTY OF Henderson

The foregoing was signed, acknowledged and sworn to before me by
SHEILA MURPHY this 29th day of October, 2021.

My commission expires 1-14-22

Jennifer S. Bell
Notary Public
Notary Public ID No. 593184

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC ALLEGED FAILURE OF BEECH)
GROVE WATER SYSTEM, INC. AND ITS)
OFFICERS, NATHAN WARD, CHAD MCMAHON,)
GREG CHEATHAM, GREG DANT, AND ITS)
MANAGER, SHEILA MURPHY, TO COMPLY)
WITH A COMMISSION ORDER, KRS 278.990)CASE No. 2021-000349**

VERIFIED RESPONSE OF
NATHAN WARD

Respondent **NATHAN WARD** states as follows:

1. I am a former Beech Grove Water System, Inc. (BGWS) director. I resigned as a director in June 2021. I received no stipend for serving. I am employed full time at Southwire.

2. As a director I relied on our administrator, **SHEILA MURPHY**, for regulatory deadlines. I was unaware of the Commission's directive to file a general rate adjustment matter.

3. At no time during our monthly meetings did Sheila Murphy indicate a recalcitrance toward the Commission. She has always indicated a willingness to comply

with her statutory and regulatory duties. Her statement that the failure to file was through oversight is genuine.

4. BGWS intends to prevent this by establishing a secondary regulatory e-mail address so that deadlines will be monitored by more than one person.

5. BGWS is taking steps to begin an alternate rate filing (ARF) and this will be the primary focus of the board until the ARF has been concluded.

Nathan Ward

NATHAN WARD

STATE OF KENTUCKY
COUNTY OF McLEAN

The foregoing was signed, acknowledged and sworn to before me by NATHAN WARD this 27 day of October, 2021.

My commission expires 10-30-2021

Shela Murphy

Notary Public

Notary Public ID No. 589625

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC ALLEGED FAILURE OF BEECH)
GROVE WATER SYSTEM, INC. AND ITS)
OFFICERS, NATHAN WARD, CHAD McMAHON,)
GREG CHEATHAM, GREG DANT, AND ITS)
MANAGER, SHEILA MURPHY, TO COMPLY)
WITH A COMMISSION ORDER, KRS 278.990)CASE No. 2021-000349**

VERIFIED RESPONSE OF
GREG DANT

Respondent **GREG DANT** states as follows:

1. I am a Beech Grove Water System, Inc. (BGWS) director and have been for approximately five (5) years. I receive no stipend for serving. I am retired from the McLean County Road Department.
2. As a director I rely on our administrator, **SHEILA MURPHY**, for regulatory deadlines. I was unaware of the Commission's directive to file a general rate adjustment matter.
3. At no time during our monthly meetings did Sheila Murphy indicate a recalcitrance toward the Commission. She has always indicated a willingness to comply

with her statutory and regulatory duties. Her statement that the failure to file was through oversight is genuine.

4. BGWS intends to prevent this by establishing a secondary regulatory e-mail address so that deadlines will be monitored by more than one person.

5. BGWS is taking steps to begin an alternate rate filing (ARF) and this will be the primary focus of the board until the ARF has been concluded.




GREG DANT

**STATE OF KENTUCKY
COUNTY OF McLEAN**

The foregoing was signed, acknowledged and sworn to before me by **GREG DANT** this 27 day of October, 2021.

My commission expires 10-30-2021



Notary Public
Notary Public ID No. 589625

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC ALLEGED FAILURE OF BEECH)
GROVE WATER SYSTEM, INC. AND ITS)
OFFICERS, NATHAN WARD, CHAD McMAHON,))
GREG CHEATHAM, GREG DANT, AND ITS)
MANAGER, SHEILA MURPHY, TO COMPLY)
WITH A COMMISSION ORDER, KRS 278.990)** CASE No. 2021-000349

VERIFIED RESPONSE OF
CHAD McMAHON

Respondent **CHAD McMAHON** states as follows:

1. I am a Beech Grove Water System, Inc. (BGWS) director and have been for six (6) years. I receive no stipend for serving. In addition, I am employed full time at Southern States in Calhoun, KY.
2. As a director I rely on our administrator, **SHEILA MURPHY**, for regulatory deadlines. I was unaware of the Commission's directive to file a general rate adjustment matter.
3. At no time during our monthly meetings did Sheila Murphy indicate a recalcitrance toward the Commission. She has always indicated a willingness to comply

with her statutory and regulatory duties. Her statement that the failure to file was through oversight is genuine.

4. BGWS intends to prevent this by establishing a secondary regulatory e-mail address so that deadlines will be monitored by more than one person.

5. BGWS is taking steps to begin an alternate rate filing (ARF) and this will be the primary focus of the board until the ARF has been concluded.




CHAD McMAHON

**STATE OF KENTUCKY
COUNTY OF McLEAN**

The foregoing was signed, acknowledged and sworn to before me by **CHAD McMAHON** this 29 day of October, 2021.

My commission expires 10-30-2021



Notary Public
Notary Public ID No. 589625

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC ALLEGED FAILURE OF BEECH)
GROVE WATER SYSTEM, INC. AND ITS)
OFFICERS, NATHAN WARD, CHAD McMAHON,)
GREG CHEATHAM, GREG DANT, AND ITS)
MANAGER, SHEILA MURPHY, TO COMPLY)
WITH A COMMISSION ORDER, KRS 278.990)CASE No. 2021-000349**

VERIFIED RESPONSE OF
GREG CHEATHAM

Respondent **GREG CHEATHAM** states as follows:

1. I am a Beech Grove Water System, Inc. (BGWS) director and have been for six (6) years. I receive no stipend for serving. In addition, I am a self-employed farmer.
2. As a director I rely on our administrator, **SHEILA MURPHY**, for regulatory deadlines. I was unaware of the Commission's directive to file a general rate adjustment matter.
3. At no time during our monthly meetings did Sheila Murphy indicate a recalcitrance toward the Commission. She has always indicated a willingness to comply

with her statutory and regulatory duties. Her statement that the failure to file was through oversight is genuine.

4. BGWS intends to prevent this by establishing a secondary regulatory e-mail address so that deadlines will be monitored by more than one person.

5. BGWS is taking steps to begin an alternate rate filing (ARF) and this will be the primary focus of the board until the ARF has been concluded.




GREG CHEATHAM

STATE OF KENTUCKY
COUNTY OF McLEAN

The foregoing was signed, acknowledged and sworn to before me by **GREG CHEATHAM** this 29 day of October, 2021.

My commission expires 10.30 - 2021



Notary Public
Notary Public ID No. 589625