

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

**In the Matter of:**

ELECTRONIC APPLICATION OF NORTHERN KENTUCKY )  
WATER DISTRICT FOR A CERTIFICATE OF PUBLIC ) **CASE NO. 2025-00007**  
CONVENIENCE AND NECESSITY AND APPROVAL OF )  
FINANCING FOR THE CONSTRUCTION OF NEWPORT )  
WATER MAIN REPLACEMENT PHASE 1 AND PHASE 2 )

**RESPONSE TO NOTICE OF FILING DEFICIENCY**

Northern Kentucky Water District (“NKWD”), by and through counsel, submits its response to Commission Staff’s January 24, 2025 Letter providing notice of a filing deficiency:

1. **807 KAR 5:001 Section 15(2)(f): An estimated annual cost of operation after the proposed facilities are placed into service; Annual Cost of Operation is not included in Application.**

**RESPONSE:** NKWD states in its Application, Exhibit D for both Phase 1 and Phase 2 the following:

**Additional Costs and O&M: No additional operating and maintenance costs are anticipated from the project.**

NKWD further clarifies that it does not anticipate that this project will result in an increase in the costs to operate NKWD’s system because the project is for the replacement of distribution lines already in existence. No additional pumping stations are proposed, and the replacement of the lines is not expected to result in additional pumping costs, nor an increased use of electricity or chemicals. It is possible that the project will result in a decrease in operation and maintenance costs as the number of line breaks is reduced. However, any attempt to quantify savings that may be experienced as a result of this project would be speculative at this point.

2. **807 KAR 5:001 Section 12(2)(d): Information required is omitted or not specified in application.**

**RESPONSE:** NKWD submitted Exhibit E-1 in response to this requirement. NKWD submits the attached revised Exhibit E-1 to supplement its Application.

3. **807 KAR 5:001 Section 12(2)(e): Information required is omitted or not specified in application.**

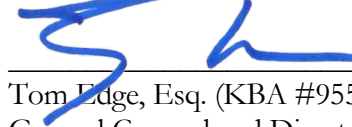
**RESPONSE:** NKWD submitted Exhibit E-1 in response to this requirement. NKWD submits the attached revised Exhibit E-1 to supplement its Application.

4. **807 KAR 5:001 Section 15(2)(g): Information required is omitted or not specified in application.**

**RESPONSE:** NKWD submitted Exhibit E-1 in response to this requirement. NKWD submits the attached revised Exhibit E-1 to supplement its Application.

NKWD believes that the information provided contains all requirements of the regulations. To the extent that the information provided does not adequately address some portion of the regulations cited, NKWD requests a deviation.

RESPECTFULLY SUBMITTED:

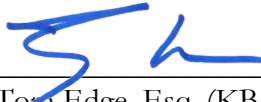


---

Tom Edge, Esq. (KBA #95534)  
General Counsel and Director of Compliance,  
Communications and Regulatory Affairs  
Cassandra Zoda, Esq. (KBA #96871)  
Contracts, Claims and Procurement Coordinator  
Northern Kentucky Water District  
2835 Crescent Springs Rd.  
Erlanger, KY 41018  
Phone - 859-578-5457  
Fax - 859-426-2770  
Email: [tedge@nkywater.org](mailto:tedge@nkywater.org)  
[czoda@nkywater.org](mailto:czoda@nkywater.org)  
*Counsel for Northern Kentucky Water District*

### CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on February 2, 2025 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



---

Tom Edge, Esq. (KBA #95534)



Exhibit E-1  
 Mortgages, Bonds, Notes and Other Indebtedness  
 As of 11/30/2024

MORTGAGES								
Mortgage Identification	Brief Description	Date of Execution	Name of Mortgagor	Name of Mortgagee or Trustee	Amount of Indebtedness authorized to be secured	Amount of Indebtedness Actually Secured	Sinking Fund Provisions	Amount Outstanding 11/30/2024
NONE								-
								<u>\$ -</u>

BONDS											
Bond Identification	Amount Authorized	Amount Issued	Name of Public Utility	Description of Each Class	Date of Issue	Face Value	Rate of Interest	Date of Maturity	How Secured	Amount of Interest Paid During Last Fiscal Year	Amount Outstanding 11/30/2024
2013A	28,165,000	26,400,000	NKWD	n/a	6/27/2013	26,400,000	4.250 - 5.000%	2/1/2038	Pledge of Future Revenues	803,650	18,250,000
2013B	26,570,000	24,120,000	NKWD	n/a	9/25/2013	24,120,000	5.000 - 4.000%	2/1/2028	Pledge of Future Revenues	347,300	6,985,000
2014A	1,733,000	1,733,000	NKWD	n/a	12/11/2017	1,733,000	2.750%	2/1/2057	Pledge of Future Revenues	44,227	1,593,500
2014B	16,965,000	15,805,000	NKWD	n/a	12/23/2014	15,805,000	3.125 - 4.000%	2/1/2029	Pledge of Future Revenues	101,663	2,765,000
2016A	47,335,000	41,905,000	NKWD	n/a	11/22/2016	41,905,000	5.000 - 3.000%	2/1/2031	Pledge of Future Revenues	972,525	22,980,000
2019	19,600,000	17,845,000	NKWD	n/a	9/26/2019	17,845,000	3.000 - 5.000%	2/1/2044	Pledge of Future Revenues	524,200	15,395,000
2020	25,195,000	22,325,000	NKWD	n/a	11/5/2020	22,325,000	5.000 - 2.000%	2/1/2035	Pledge of Future Revenues	630,325	17,555,000
2021B	32,395,000	27,730,000	NKWD	n/a	12/14/2021	27,730,000	4.000%	2/1/2027	Pledge of Future Revenues	643,700	13,755,000
2023A	27,335,000	17,615,000	NKWD	n/a	1/26/2023	17,615,000	5.000 - 4.125%	2/1/2048	Pledge of Future Revenues	744,531	17,230,000
											<u>\$ 116,508,500.00</u>

NOTES							
Note Identification	Date of Issue	Amount	Date of Maturity	Rate of Interest	In Whose Favor	Amount of Interest Paid During Last Fiscal Year	Amount Outstanding 11/30/2024
KIA Loan F08-07	11/1/2008	4,000,000	12/1/2032	1.2000%	KIA	23,106	1,797,914
KIA Loan F09-02	6/1/2010	24,000,000	6/1/2033	2.2500%	KIA	276,493	11,986,058
KIA Loan F13-012	8/1/2014	8,000,000	6/1/2044	2.0000%	KIA	113,849	8,000,000
KIA Loan F14-015	6/1/2015	3,545,910	6/1/2038	2.0000%	KIA	52,991	2,608,604
KIA Loan F15-011	3/1/2016	3,535,094	6/1/2038	2.0000%	KIA	52,829	2,600,646
KIA Loan B15-003	7/1/2016	1,392,195	12/1/2037	0.9500%	KIA	9,314	963,453
KIA Loan F16-027*	1/1/2019	4,000,000	N/A	2.0000%	KIA	31,235	1,558,034
KIA Loan F20-044*	2/16/2023	8,000,000	N/A	1.7500%	KIA	41,951	3,935,000
KIA Loan F23-007S**	N/A	4,000,000	N/A	2.5500%	KIA	-	-
						\$	<u>33,449,709.10</u>

\*not yet closed

\*\*pending approval in PSC Case 2025-00007

OTHER INDEBTEDNESS					
Indebtedness Identification	Classes	Description of Security	Brief Statement of Devolution or assumption of a portion of the indebtedness upon or by person or corporation if the original liability has been transferred	Interest Paid During Last Fiscal Year	Amount Outstanding as of 11/30/2024
Kenton County Deferred Note	N/A	Deferred Note Issued by Kenton County	N/A	0	\$ 100,000
					<u>\$ 100,000.00</u>