

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF)	
EAST CASEY COUNTY WATER)	CASE NO.
DISTRICT TO REVISE THE)	2025-00155
CUSTOMER BILL DUE DATE AND)	
CREDIT/DEBIT CARD PAYMENT)	
LANGUAGE TO ITS TARIFF)	

RESPONSE OF
EAST CASEY COUNTY WATER DISTRICT

TO

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION,
DATED JUNE 20, 2025

AND

MOTION FOR AN INFORMAL CONFERENCE
AND AN EXTENSION OF TIME

Filed: July 3, 2025

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**RESPONSE OF EAST CASEY COUNTY WATER DISTRICT TO
COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION
AND
MOTION FOR AN INFORMAL CONFERENCE
AND AN EXTENSION OF TIME**

East Casey County Water District (“East Casey” or the “District”) submits its Response to Commission Staff’s First Request for Information, and by and through the undersigned counsel moves the Commission to schedule an informal conference and for a reasonable extension of time following the conference to enable East Casey to file a more complete response to Item three (3) of Commission Staff’s First Request for Information (“Staff’s First Request”). In support of its Motion the District states the following:

1. This Motion is not being made to unduly delay or complicate these proceedings.

2. East Casey has provided a response to Item three (3) of Staff's First Request using information obtainable in the time allotted to provide the Response.

3. The District's bookkeeper is currently on a previously scheduled vacation and is unavailable to provide some of the information Commission Staff requested in Item three (3), in the form in which it was requested.

4. No other East Casey employee has the expertise to extract this information from East Casey's billing system and to make it available to the Commission and its Staff.

5. East Casey moves the Commission to schedule an informal conference with Staff and for a reasonable extension of time subsequent to the conference for East Casey to provide a more complete Response.

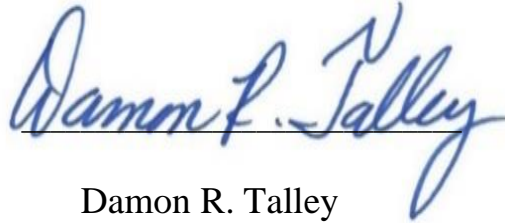
6. Such a conference should enable East Casey to provide information responsive to Staff's First Request and expedite the resolution of this proceeding.

7. East Casey proposes that the conference be held at the earliest possible date.

WHEREFORE, on the basis of the foregoing, East Casey respectfully requests that the Commission schedule an informal conference and grant it an extension of time following the conference to file a more complete response to Item three (3) of Staff's First Request.

Filed: July 3, 2025

Respectfully submitted,

A handwritten signature in blue ink that reads "Damon R. Talley". The signature is written in a cursive style with a horizontal line underneath the name.

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Counsel for East Casey County Water District

CERTIFICATE OF SERVICE

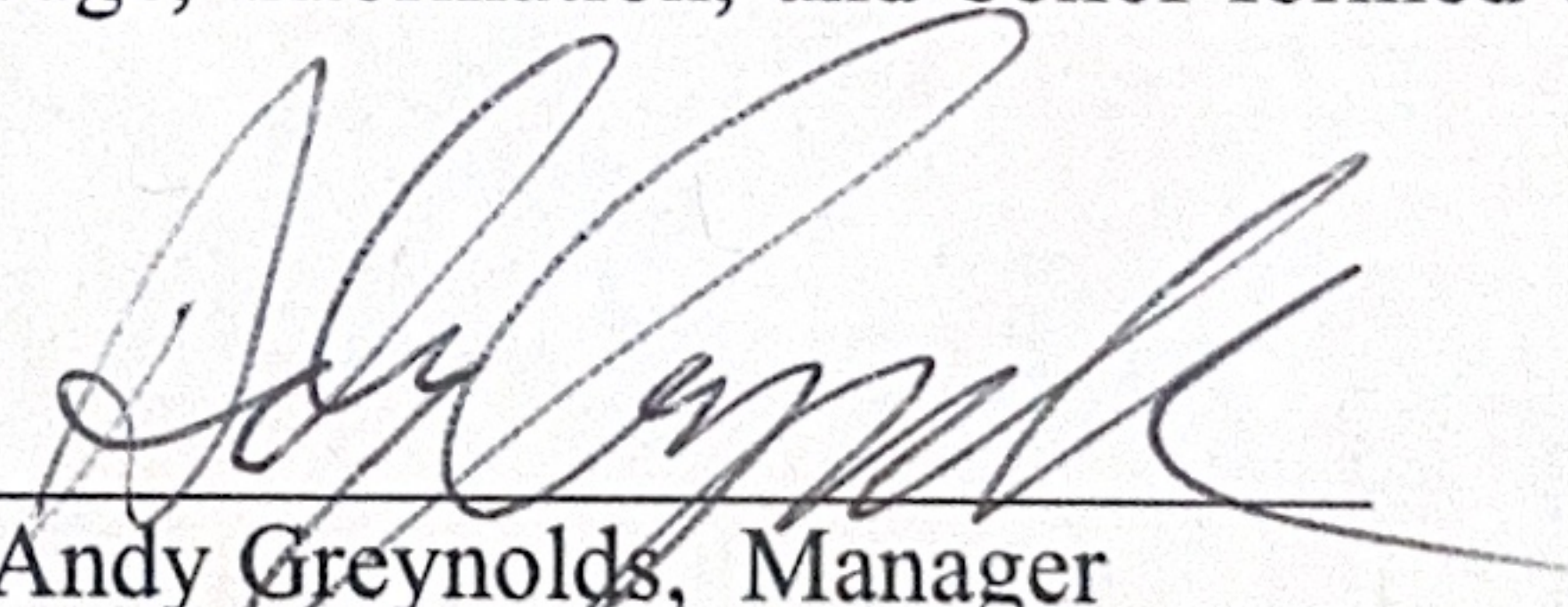
In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on July 3, 2025; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.


Damon R. Talley

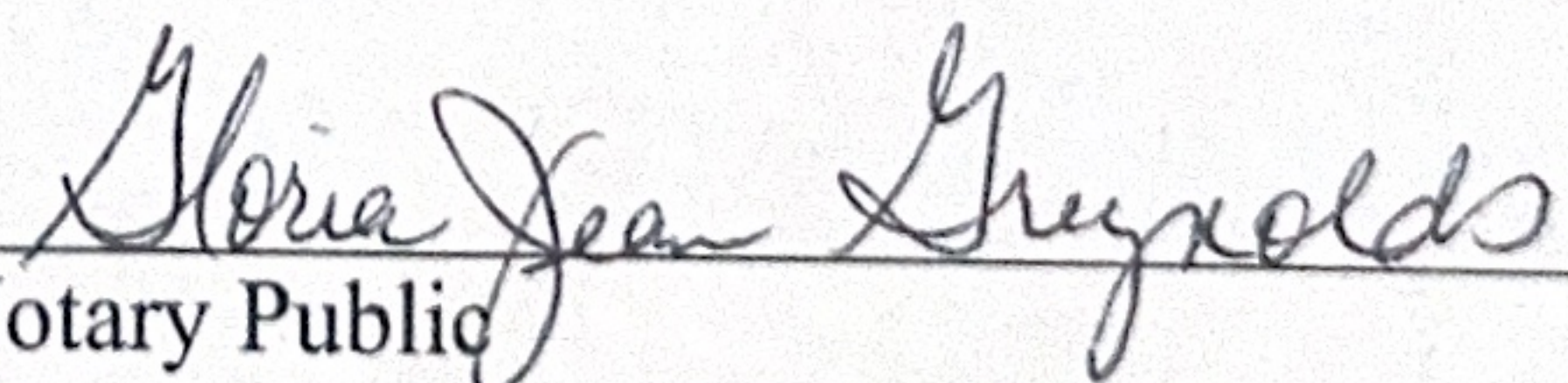
SWORN CERTIFICATION AND VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF CASEY)

The undersigned, Andy Greynolds, being duly sworn, deposes and states that he, as Manager for East Casey County Water District, has personal knowledge of the matters set forth in the items for which he is identified as the witness in East Casey County Water District's Response to Staff's First Request for Information in Kentucky Public Service Commission Case No. 2025-00155, and the information contained therein is true and correct to the best of his information, knowledge, and belief. Further, he certifies that he has supervised the preparation of this Response as required by 807 KAR 5:001, Section 4(12)(d)(2)(b), and that the Response is true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry.


Andy Greynolds, Manager
East Casey County Water District

Subscribed, sworn to, and acknowledged before me, a Notary Public in and for said county and state, this 3rd day July of 2025.


Notary Public

My Commission Expires: May 10th, 2026

Notary ID: KYNP71586

EAST CASEY COUNTY WATER DISTRICT

Case No. 2025-00155

Response to Commission Staff's First Request for Information

Question No. 1-1

Responding Witness: Andy Greynolds, Manager

Q 1-1. Confirm that prior to the May 1, 2025 filing that is the subject of this case that East Casey required payment for monthly water service to be received, not postmarked, before the close of business on the tenth day from the date of issue of the bill. If not, explain the response.

A 1-1. It has been the long-standing practice of East Casey District to require payment to be **received** before the close of business on the tenth day of the following month after bills are issued.

East Casey District mails its own bills and does not use a third-party contractor for this service. For at least the last twenty-five years customer bills have been mailed on or just prior to the last business day of the month. The bills contained a printed statement that they were due on the 10th day of the following month and that a 10 percent Late Payment Charge would be assessed if payment was not **received** by this date.

EAST CASEY COUNTY WATER DISTRICT

Case No. 2025-00155

Response to Commission Staff's First Request for Information

Question No. 1-2

Responding Witness: Andy Greynolds, Manager

Q 1-2. Refer to the response to Item 1 in this request. Confirm that, if payment was not received on or before the close of business on the tenth day from the date of issue of the bill, a late payment penalty was charged to the customer. If not confirmed, explain why not.

A 1-2. Bills are mailed on, or prior to, the last business day of each month. Before Friday, June 27, 2025, the bills contained a printed statement that they were due before the 10th day of the following month and that a 10 percent Late Payment Charge would be assessed if payment was not received by that date. See **Attachment 1-2-1** for a copy of the bill issued on April 28, 2025.

However, an exception to the normal assessment of Late Payment Charges occurred in February 2025. Despite mailing bills as usual on January 31, 2025, East Casey District was flooded with calls from customers in early February 2025, stating that they had not received a bill. Even some of East Casey District's employees reported they did not receive bills as usual. Some bills were torn and damaged when they were received, and some customers reported receiving a

termination notice before receiving a bill. For this reason, East Casey District concluded there was a wide-spread problem with the postal service in the area at the time and did not assess any Late Payment Charges at all in February 2025.

On June 11, 2025, following the Commission's opening of this proceeding, East Casey District refunded all Late Payment Charges assessed in May 2025. Commencing on June 27, 2025, the bills now state that they are due on the 20th day of the following month and that a Late Payment Charge of 10 percent will be assessed if payment is not received by the due date. See Attachment **1-2-2** for a copy of the June 27, 2025 bill.

Attachment 1-2-1

April 28, 2025 Bill

EAST CASEY COUNTY WATER DIST.
PO BOX 56
LIBERTY KY 42539

NASHVILLE TN 370

FIRST CLASS MAIL
U.S. POSTAGE PAID

LIBERTY KY 01

ACCOUNT
SERVICE AT
DATES

04/28/25
02554 L
5 THRU 04/02/25

Presorted First-Class



SVC.	PREVIOUS	CURRENT	USAGE	CODE
------	----------	---------	-------	------

WTR	250900	252400	1500	
WATER			23.24	
SCH TAX			.70	

BILL DATE
NET BILL

04/28/25
23.94

GROSS BILL
DUE AFTER

26.26
05/10/25

RETURN SERVICE REQUESTED

606-787-9961

GROSS
DUE
AFTER

26.26
05/10/25

NET
DUE
NOW

23.94

JULIE WERTMAN



Attachment 1-2-2

June 27, 2025 Bill

EAST CASEY COUNTY WATER DIST.
PO BOX 56
LIBERTY KY 42539

FIRST CLASS MAIL
U.S. POSTAGE PAID

LIBERTY KY
PERMIT NO. 01

ACCOUNT
SERVICE AT
DATES

138 DENSON RD
05/15/25 THRU 06/10/25

06/27/25

Presorted First-Class



SVC.	PREVIOUS	CURRENT	USAGE	CODE
------	----------	---------	-------	------

WTR	460300	463000	2700	
WATER			30.27	
SCH TAX			.91	

BILL DATE
NET BILL

06/27/25
31.18

GROSS BILL
DUE AFTER

34.21
07/20/25

FOR WATER QUALITY REPORT
tapwaterinfo.com/eastcasey
606-787-9961

RETURN SERVICE REQUESTED

GROSS
DUE
AFTER

34.21
07/20/25

NET
DUE
NOW

31.18

138 DENSON RD
LIBERTY KY 42539-6175



EAST CASEY COUNTY WATER DISTRICT

Case No. 2025-00155

Response to Commission Staff's First Request for Information

Question No. 1-3

Responding Witness: Andy Greynolds, Manager

Q 1-3. For Calendar year 2023, 2024, and 2025 to date, provide by month, in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible, a list of customers whose payment was received after the tenth day from the date of bill issue but before the 20th day from the date of bill issue. The list should include the amount of the late payment penalty charged in each instance.

A. 1-3. East Casey District's Late Payment Charge is 10 percent of the outstanding bill. This has been the District's Late Payment Charge for many years. Filed separately as **Attachment 1-3** is an Excel spreadsheet containing the date Late Payment Charges were posted to customer accounts, the total number of customers to whose accounts they were posted, and the total amount of Late Payments Charges assessed for each month in 2023, 2024, and 2025. The "Total Customers" column on the spreadsheet includes **only** those customers who paid their bill *before* the 20th, but *after* the 10th.

EAST CASEY COUNTY WATER DISTRICT
Case No. 2025-00155
Response to Commission Staff's First Request for Information

Question No. 1-4

Responding Witness: Andy Greynolds, Manager

Q 1-4. Explain whether shifting the due date to the fifteenth or twentieth day from the date of issue of the bill or requiring payments to be postmarked prior to the tenth day from the date of issue of the bill would have an adverse effect on East Casey District.

A 1-4. East Casey District has thoughtfully considered this issue and has determined that assessing a Late Payment Charge for bills that remain unpaid at the close of business on the 20th day of the month, rather than at the close of business on the 10th day of the month will not cause a significant financial burden to the District.

However, East Casey District acknowledges that its long-standing practice of assessing Late Payment Charges prior to the 20th day following the issuance of the bill is not in accordance with its tariff on file with the Commission. East Casey District proposes to change its tariff language to reflect its actual practice of issuing bills on or about the last day of the month. East Casey District further proposes to change its tariff language to require payment before close of business on the 20th day of the month following the month in which the bill was issued.

Original Tariff Sheet No. 12, at subparagraph “b” of paragraph 5, entitled “Related Information” states: “Water service will be billed monthly.” East Casey District proposes to change this language to: “Bills for water service will be issued on or about the last day of the month.” East Casey District has considered the language contained in paragraph “d” of Original Tariff Sheet No. 13, and proposes to make the change shown below:

Current Tariff Language

Payment must be received, not postmarked, before the close of business on the twentieth day from the date of issue; otherwise, the delinquent bill will be assessed the late payment penalty approved and on-file with the Public Service Commission.

Proposed Tariff Language

Payment must be received, not postmarked, before the close of business on the 20th day of the month following the month in which the bill was issued; otherwise, the delinquent bill will be assessed the Late Payment Charge approved and on file with the Public Service Commission.