

Joe Covington

From: Joe Covington
Sent: Tuesday, December 30, 2025 4:16 PM
To: 'Larry'
Subject: RE: Bluegrass Water Utility Operating Company, LLC

Mr. Averitt

Thank you for your email. I will reach out to ask our counsel at Strobo Barkley for their input on your request to petition other county governments to join in the opposition to the Bluegrass Water rate increase proposal. We will circle back after I get some feedback.

Respectfully

JPC

From: Larry [REDACTED]
Sent: Thursday, December 25, 2025 4:57 PM
To: Joe Covington <joe.covington@scottky.gov>
Cc: 'David Spenard' <dspenard@strobobarkley.com>
Subject: Bluegrass Water Utility Operating Company, LLC

Joe Pat Covington
Judge/Executive,
Scott County, KY

Re: Bluegrass Water, LLC

Dear sir,

As administrator of an on-line coalition group, Bluegrass Water Resistance, with approximately 575 members, currently, including many Scott County residents, I am contacting your office regarding the matter of Bluegrass Water Utility Operating Company, LLC (Bluegrass Water).

As you are aware, since incorporating in 2019, Bluegrass Water continues to purchase water and wastewater systems throughout the state, and increase monthly service rates to unprecedented levels for many residents of the thirteen (13) Kentucky counties in which they operate, including Scott County.

On December 11, 2025, Bluegrass Water submitted an application to the Public Service Commission, for yet another egregious increase in both water and sewer rates. They now propose a sewer rate increase of 46.6%, from \$77.77 to \$114.00/mo, and a water rate increase of 36.7%, from \$77.63 to \$106.12, in the current KPSC Rate Case # 2025-00354!

We have done extensive research on this issue, including a water and wastewater rate comparability

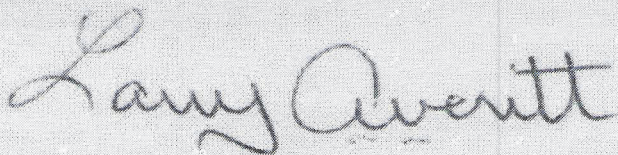
study, which verifies and validates our assertion that even current Bluegrass Water rates are excessive, based on the usual and customary monthly rates for similar services in the Kentucky counties wherein Bluegrass Water conducts business.

We are well aware, and want to express our genuine appreciation to you and your administration, for being the ONLY county government to intervene in this matter, to date!

However, in our efforts to combat this obvious corporate greed, and the financial hardship it has imposed on so many Kentucky residents, we would like to persuade the other associated county governments to follow your excellent example. As such, any suggestions or assistance you could offer in that regard would be greatly appreciated!

Likewise, we are at your disposal if we can provide information or assistance in any way to your office, and/or the office of Strobo Barkley PLLC.

Sincerely,

A handwritten signature in cursive script that reads "Larry Averitt".

Larry Averitt

500 Greenvale L
Paducah, KY 42001

Joe Covington

From: Joe Covington
Sent: Tuesday, February 3, 2026 10:19 AM
To: 'Nunn, Matt (State Sen.) (LRC)'
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC
Attachments: 20260127_PSC_ORDER Granting Motion to Intervene.pdf

Matt

I will call you in between 12:00 and 12:30- I have attached a file that shares info related to our Motion to Intervene in the Case with the PSC and we have hired outside counsel and experts (sharing costs with the Attorney Generals Office on one expert) to share information in opposition to the rate increase . I shared the following Public Notice on 12-23 as well.

PUBLIC NOTICE

12-23-25

Scott County Fiscal Court Action Regarding

Kentucky Public Service Commission Case No. 2025-00354

The **Scott County Fiscal Court** approved a proposal today to retain the legal services of the **Strobo Barkley law firm** to represent **Scott County, Kentucky** in **Kentucky Public Service Commission ("PSC") Case No. 2025-00354**, titled:

Electronic Application of Bluegrass Water Utility Operating Company, LLC for an Adjustment of Water and Sewage Rates.

Pursuant to this approval, **Strobo Barkley** will file a motion to intervene on behalf of Scott County in response to **Bluegrass Water Utility Operating Company, LLC's proposed rate increase request** currently pending before the Public Service Commission.

Judge/Executive Joe Pat Covington stated that the Scott County Fiscal Court took this action to ensure that the interests of Scott County residents, businesses, and ratepayers are fully and effectively represented during the Public Service Commission's review of the proposed rate increases.

Further updates will be provided as the case progresses.

Info from the PSC -Granting our Motion to Intervene

MOTION TO INTERVENE

As a basis for its motion, Scott County stated that it has broad statutory powers in representing the interests of Scott County and its citizens in representing the economic and public health impacts of operations of wastewater services within Scott County.⁶

6 Scott County's Motion at 2. A resolution was passed authorizing Scott County's request for intervention in this case.⁷
7 Scott County's Motion at 2.

Scott County argued that it had a special interest in this proceeding because two of Bluegrass Water's facilities, Longview/Homestead and Delaplain, are located within Scott County and contain approximately one-fourth of Bluegrass Water's wastewater customers.⁸

8 Scott County's Motion at 2. Furthermore, Delaplain has both metered and unmetered connections, and Scott County provided that the Delaplain commercial class is the only current class receiving metered service.⁹

9 Scott County's Motion at 2. Scott County also noted that Bluegrass Water's proposed rates, if approved, would result in a 46.6 percent rate increase for its residential customers, a 44.4 percent rate increase for the meter charge for its non-residential -3- Case No. 2025-00354

Delaplain customers, and a 378.7 percent rate increase (per 1,000 gallons) for the volumetric component for its Scott County non-residential Delaplain customers.¹⁰ Scott County argued that it has a special interest in the case not otherwise represented because the rate increase impacts rate affordability, health, safety, and economic development in Scott County.¹¹ Scott County, recognizing the Attorney General's role as an intervenor in this case, argued that the Attorney General's statutory role representing consumers in Commission proceedings does not preclude other governmental entities from representing their special interests as intervenors in Commission proceedings.¹²

From: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@scottky.gov>
Sent: Tuesday, February 3, 2026 10:06 AM
To: Joe Covington <joe.covington@scottky.gov>
Subject: Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Yes sir! Could you call me between 12:00 and 12:30? That's my only window, plus I'll have Ryan Pratt in my office then so it could work well.

Best Regards,

Matt Nunn

*This email was sent from my phone, please excuse the brevity.

From: Joe Covington <joe.covington@scottky.gov>
Sent: Tuesday, February 3, 2026 9:03:28 AM
To: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@scottky.gov>
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Would you have time for a phone call today? JPC

From: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@scottky.gov>
Sent: Monday, February 2, 2026 5:06 PM
To: Joe Covington <joe.covington@scottky.gov>
Subject: FW: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Hello,

Can you update me on the situation and the fiscal court's efforts?

Best Regards,

Matt

From: manuel jimenez [REDACTED]
Sent: Sunday, February 1, 2026 7:23 PM
To: PSC Public Comment <PSC.Comment@ky.gov>; Hampton, Tony (State Rep.) (LRC) <Tony.Hampton@ky.gov>; Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@ky.gov>
Subject: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Manuel Edwardo Jimenez
100 Devin Dr.
Georgetown, KY 40324

Date: December 27th, 2025

Kentucky Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC
Proposed Wastewater Rate Adjustment (Filed December 11, 2025)

Dear Senator Nunn, Representative Hampton, and Commissioners:

Pursuant to KRS 278.260, and the Commission's statutory duty to ensure that utility rates are fair, just, reasonable, and non-discriminatory, I hereby submit this formal request for intervention in the above-referenced proceeding.

I am a residential customer of Bluegrass Water Utility Operating Company, LLC ("Bluegrass Water") residing in a 4-family household with low and consistent wastewater usage. The proposed residential rate increase of approximately 46.6% is excessive, inequitable, and unsupported by proportional cost causation, and therefore violates both KRS Chapter 278 and long-standing Kentucky precedent.

Statutory Violations

Under KRS 278.030(1), utility rates must be "fair, just, and reasonable," and utilities are prohibited from charging rates that are unjustly discriminatory. Additionally, KRS 278.170(1) prohibits utilities from subjecting any customer or class of customers to unreasonable disadvantage.

The proposed increase relies heavily on inflated minimum charges that disconnect the price paid from actual wastewater usage. As a result, low-usage residential customers such as myself are forced to subsidize costs unrelated to their contribution to system demand, placing us at an unreasonable disadvantage in violation of statute.

Kentucky Case-Law and PSC Precedent

Kentucky courts have repeatedly affirmed that utilities bear the burden of proving that proposed rates are reasonable and properly allocated:

In *Kentucky Industrial Utility Customers, Inc. v. Public Service Commission*, the Kentucky Supreme Court held that the Commission must ensure rates are supported by substantial evidence and are not excessive or unfairly allocated among customer classes.

In *Cincinnati Bell Telephone Co. v. Public Service Commission*, the Court reaffirmed that rates must reflect a rational relationship between cost causation and customer charges, and that the PSC has a duty to protect consumers from unreasonable rate designs.

The Commission has further recognized in numerous rate orders that minimum charges must be narrowly tailored and may not be used to impose disproportionate costs on customers who do not materially drive system expenses.

Collectively, this precedent establishes that rate structures which obscure cost responsibility, penalize conservation, or impose excessive burdens on low-usage customers are inconsistent with Kentucky law.

Failure of Proof and Public Interest Concerns

While infrastructure investment may be a legitimate utility objective, Kentucky law is clear that:

Costs must be prudently incurred;

Rate impacts must be reasonably distributed; and

Utilities must demonstrate that less burdensome alternatives have been fully considered.

Bluegrass Water has not met this burden. A nearly 50% increase in wastewater rates for an essential service—without adequate usage-based justification—would be confiscatory in effect for small households and contrary to the public interest the Commission is charged with protecting under KRS 278.040(2).

Request for Relief

For the foregoing reasons, I respectfully request that the Commission:

Grant this request for intervention pursuant to KRS 278.260;

Require Bluegrass Water to submit detailed cost-of-service and rate-design justification;

Reject or substantially reduce the proposed residential rate increase; and

Direct the utility to develop a rate structure consistent with Kentucky statutory and case law.

Please confirm receipt of this request and include me on the service list for all future filings in this matter.

Respectfully submitted,

Manuel Edwadro Jimenez

Joe Covington

From: Joe Covington
Sent: Sunday, June 7, 2026 11:46 AM
To: David Livingston; Dwayne Ellison; Chad Wallace; Kelly Corman; Ryan Pratt; Rick Hostetler; Rob Jones; Cameron Culbertson; svernengo [REDACTED] Jack Conner
Subject: .Posted to Facebook
Attachments: IMG_1832.jpeg

Posted to Facebook as discussed at meeting:

UPDATE:

Bluegrass Water Rate Case – Case No. 2025-00354

Please Share with those households and business's using Bluegrass Water for their sanitary sewer service

Scott County Fiscal Court wants to keep our citizens informed on the status of the proposed Bluegrass Water Utility rate increase case currently before the Kentucky Public Service Commission (PSC).

This past week, the PSC entered a new procedural order (dated May 26, 2026) with several important developments:

Bluegrass Water's proposed rates have been **SUSPENDED** up to and including December 7, 2026 — meaning no new rates can take effect before that date.

A public hearing has been scheduled for September 21, 2026 at 9:00 a.m. Eastern Daylight Time at the PSC offices, 211 Sower Boulevard, Frankfort, Kentucky. The hearing will also be streamed live on the PSC's YouTube channel (linked on psc.ky.gov). Public comments may be made at the beginning of the hearing.

The PSC has also established a procedural schedule leading up to the hearing:

- Initial information requests due: June 18, 2026
- Bluegrass Water responses due: July 2, 2026
- Supplemental requests due: July 16, 2026
- Supplemental responses due: July 30, 2026
- Intervenor testimony due: August 13, 2026
- Bluegrass Water rebuttal testimony due: September 10, 2026
- Public Hearing: September 21, 2026

The Scott County Fiscal Court is an intervenor in this case and will continue to actively participate in the process on behalf of our citizens. We are committed to ensuring the PSC has the full picture of the impact any rate increase would have on Scott County residents and businesses.

We will continue to post updates as this case progresses. If you have questions, please contact the Scott County Judge Executive's office at (502) 863-7850.

Get Outlook for iOS

Joe Covington

From: Joe Covington
Sent: Wednesday, February 4, 2026 10:08 AM
To: David Livingston; Dwayne Ellison; Chad Wallace; Kelly Corman; Rob Jones; Rick Hostetler; Ryan Pratt; Cameron Culbertson; Karen Hankins; Jared Hollon; Stacy H
Subject: Info shared about Bluegrass Water Rate Increase

Sharing via email what was shared earlier on Facebook

Please share info if people inquire on situation and how individuals can make public comment in opposition to rate increase.

Important Update for Scott County Residents Regarding Bluegrass Water Rate Increase Proposal

Scott County Judge/Executive Joe Pat Covington and the Scott County Fiscal Court want citizens to know that we are actively working with legal counsel to intervene and oppose the significant rate increases proposed by Bluegrass Water Utility Operating Company.

The Kentucky Public Service Commission (PSC) has granted Scott County full intervention status in this case, recognizing that our community has a special and unique interest due to the economic and public health impacts of wastewater services within Scott County .

Key points from the PSC Order:

- **Two Bluegrass Water facilities (Longview/Homestead and Delaplain) are located in Scott County and serve approximately one-fourth of Bluegrass Water's wastewater customers**
- **Proposed increases include:**
 - **46.6% increase for residential customers**
 - **44.4% increase for non-residential meter charges**
 - **Up to 378.7% increase (per 1,000 gallons) for the volumetric component for certain Scott County non-residential customers**
- **The PSC determined Scott County's participation will help present issues and develop facts necessary for a full and fair review of the case .**

Judge/Executive Covington and the Fiscal Court remain committed to standing up for Scott County families, businesses, and ratepayers and will continue to push back against unreasonable increases while this case moves forward.

Any citizen that would like to submit public comment to the Public Service Commission related to the proposed rate increase the link to submit public comment is attached below.

Case 2025-00354- Bluegrass Water Utility Operating Company, LLC.

<https://psc.ky.gov/Case/PublicComments/2025-00354>

We will provide updates as more information becomes available.

Joe Covington

From: Joe Covington
Sent: Wednesday, February 4, 2026 10:05 AM
To: Jack Conner; Cameron Culbertson
Subject: Re: Public Comment Link

Jack

I posted this on Facebook if you want to share

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We will provide updates as more information becomes available.

From: Jack Conner [REDACTED]
Sent: Wednesday, February 4, 2026 9:29:59 AM
To: Cameron Culbertson <cameron.culbertson@scottky.gov>
Cc: Joe Covington <joe.covington@scottky.gov>
Subject: Re: Public Comment Link

Thanks

[Get Outlook for iOS](#)

From: Cameron Culbertson <cameron.culbertson@scottky.gov>
Sent: Wednesday, February 4, 2026 9:29:24 AM
To: Jack Conner [REDACTED]
Cc: Joe Covington <joe.covington@scottky.gov>
Subject: Public Comment Link

Jack,

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Thanks,

Cameron R. Culbertson
Scott County Attorney



SCOTT COUNTY ATTORNEY
CAM CULBERTSON

SCOTT COUNTY ATTORNEY'S OFFICE

198 E. Washington St.
Georgetown, KY 40324
(502) 863-7870

Joe Covington

From: Cameron Culbertson
Sent: Wednesday, February 4, 2026 9:50 AM
To: Joe Covington; Jared Hollon
Subject: Re: Social Media Post summary

Joe Pat,

I think this is fine. All of this information is accurate. And I think it's okay to inform citizens about the option to submit public comment, so I think providing the link is okay.

Cam

From: Joe Covington <joe.covington@scottky.gov>
Sent: Wednesday, February 4, 2026 9:45 AM
To: Cameron Culbertson <cameron.culbertson@scottky.gov>; Jared Hollon <jared.hollon@scottky.gov>
Subject: Social Media Post summary

Cam and Jared

Would you add anything

What are your thoughts on adding the link to make public comment?

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We will provide updates as more information becomes available.

Get [Outlook for iOS](#)

Joe Covington

From: Jared Hollon
Sent: Wednesday, February 4, 2026 9:49 AM
To: Joe Covington; Cameron Culbertson
Subject: RE: Social Media Post summary

I think a link would be fine. People want their voice,

From: Joe Covington <joe.covington@scottky.gov>
Sent: Wednesday, February 4, 2026 9:46 AM
To: Cameron Culbertson <cameron.culbertson@scottky.gov>; Jared Hollon <jared.hollon@scottky.gov>
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Joe Covington

From: Jack Conner [REDACTED]
Sent: Wednesday, February 4, 2026 9:30 AM
To: Cameron Culbertson
Cc: Joe Covington
Subject: Re: Public Comment Link

Thanks

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SCOTT COUNTY ATTORNEY
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SCOTT COUNTY ATTORNEY'S OFFICE

198 E. Washington St.
Georgetown, KY 40324
(502) 863 - 7870

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SCOTT COUNTY ATTORNEY
CAM CULBERTSON

SCOTT COUNTY ATTORNEY'S OFFICE

198 E. Washington St.
Georgetown, KY 40324
(502) 863-7870

Joe Covington

From: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@kentucky.gov>
Sent: Tuesday, February 3, 2026 1:25 PM
To: Joe Covington
Subject: Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Perfect! This is all I need. Thank you!

Best Regards,

Matt Nunn

*This email was sent from my phone, please excuse the brevity.

From: Joe Covington <joe.covington@scottky.gov>
Sent: Tuesday, February 3, 2026 10:19:04 AM
To: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@kentucky.gov>
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

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Manuel Eduardo Jimenez

[REDACTED]
Georgetown, KY 40324

Date: December 27th, 2025

Kentucky Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC
Proposed Wastewater Rate Adjustment (Filed December 11, 2025)

Dear Senator Nunn, Representative Hampton, and Commissioners:

Pursuant to KRS 278.260, and the Commission's statutory duty to ensure that utility rates are fair, just, reasonable, and non-discriminatory, I hereby submit this formal request for intervention in the above-referenced proceeding.

I am a residential customer of Bluegrass Water Utility Operating Company, LLC ("Bluegrass Water") residing in a 4-family household with low and consistent wastewater usage. The proposed residential rate increase of approximately 46.6% is excessive, inequitable, and unsupported by proportional cost causation, and therefore violates both KRS Chapter 278 and long-standing Kentucky precedent.

Statutory Violations

Under KRS 278.030(1), utility rates must be "fair, just, and reasonable," and utilities are prohibited from charging rates that are unjustly discriminatory. Additionally, KRS 278.170(1) prohibits utilities from subjecting any customer or class of customers to unreasonable disadvantage.

The proposed increase relies heavily on inflated minimum charges that disconnect the price paid from actual wastewater usage. As a result, low-usage residential customers such as myself are forced to subsidize costs unrelated to their contribution to system demand, placing us at an unreasonable disadvantage in violation of statute.

Kentucky Case-Law and PSC Precedent

Kentucky courts have repeatedly affirmed that utilities bear the burden of proving that proposed rates are reasonable and properly allocated:

In *Kentucky Industrial Utility Customers, Inc. v. Public Service Commission*, the Kentucky Supreme Court held that the Commission must ensure rates are supported by substantial evidence and are not excessive or unfairly allocated among customer classes.

In *Cincinnati Bell Telephone Co. v. Public Service Commission*, the Court reaffirmed that rates must reflect a rational relationship between cost causation and customer charges, and that the PSC has a duty to protect consumers from unreasonable rate designs.

The Commission has further recognized in numerous rate orders that minimum charges must be narrowly tailored and may not be used to impose disproportionate costs on customers who do not materially drive system expenses.

Collectively, this precedent establishes that rate structures which obscure cost responsibility, penalize conservation, or impose excessive burdens on low-usage customers are inconsistent with Kentucky law.

Failure of Proof and Public Interest Concerns

While infrastructure investment may be a legitimate utility objective, Kentucky law is clear that:

Costs must be prudently incurred;

Rate impacts must be reasonably distributed; and

Utilities must demonstrate that less burdensome alternatives have been fully considered.

Bluegrass Water has not met this burden. A nearly 50% increase in wastewater rates for an essential service—without adequate usage-based justification—would be confiscatory in effect for small households and contrary to the public interest the Commission is charged with protecting under KRS 278.040(2).

Request for Relief

For the foregoing reasons, I respectfully request that the Commission:

Grant this request for intervention pursuant to KRS 278.260;

Require Bluegrass Water to submit detailed cost-of-service and rate-design justification;

Reject or substantially reduce the proposed residential rate increase; and

Direct the utility to develop a rate structure consistent with Kentucky statutory and case law.

Please confirm receipt of this request and include me on the service list for all future filings in this matter.

Respectfully submitted,

Manuel Edwadro Jimenez

Joe Covington

From: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@kentucky.gov>
Sent: Tuesday, February 3, 2026 1:25 PM
To: Joe Covington
Subject: Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Perfect! This is all I need. Thank you!

Best Regards,

Matt Nunn

*This email was sent from my phone, please excuse the brevity.

From: Joe Covington <joe.covington@scottky.gov>
Sent: Tuesday, February 3, 2026 10:19:04 AM
To: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@kentucky.gov>
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Matt
I will call you in between 12:00 and 12:30- I have attached a file that shares info related to our Motion to Intervene in the Case with the PSC and we have hired outside counsel and experts (sharing costs with the Attorney Generals Office on one expert) to share information in opposition to the rate increase . I shared the following Public Notice on 12-23 as well.

PUBLIC NOTICE

12-23-25

Scott County Fiscal Court Action Regarding

Kentucky Public Service Commission Case No. 2025-00354

The Scott County Fiscal Court approved a proposal today to retain the legal services of the Strobo Barkley law firm to represent Scott County, Kentucky in Kentucky Public Service Commission ("PSC") Case No. 2025-00354, titled:

Electronic Application of Bluegrass Water Utility Operating Company, LLC for an Adjustment of Water and Sewage Rates.

Pursuant to this approval, Strobo Barkley will file a motion to intervene on behalf of Scott County in response to Bluegrass Water Utility Operating Company, LLC's proposed rate increase request currently pending before the Public Service Commission.

Judge/Executive Joe Pat Covington stated that the Scott County Fiscal Court took this action to ensure that the interests of Scott County residents, businesses, and ratepayers are fully and effectively represented during the Public Service Commission's review of the proposed rate increases. Further updates will be provided as the case progresses.

Info from the PSC -Granting our Motion to Intervene

MOTION TO INTERVENE

As a basis for its motion, Scott County stated that it has broad statutory powers in representing the interests of Scott County and its citizens in representing the economic and public health impacts of operations of wastewater services within Scott County.⁶

⁶ Scott County's Motion at 2. A resolution was passed authorizing Scott County's request for intervention in this case.⁷
⁷ Scott County's Motion at 2.

Scott County argued that it had a special interest in this proceeding because two of Bluegrass Water's facilities, Longview/Homestead and Delaplain, are located within Scott County and contain approximately one-fourth of Bluegrass Water's wastewater customers.⁸

⁸ Scott County's Motion at 2. Furthermore, Delaplain has both metered and unmetered connections, and Scott County provided that the Delaplain commercial class is the only current class receiving metered service.⁹

⁹ Scott County's Motion at 2. Scott County also noted that Bluegrass Water's proposed rates, if approved, would result in a 46.6 percent rate increase for its residential customers, a 44.4 percent rate increase for the meter charge for its non-residential -3- Case No. 2025-00354

Delaplain customers, and a 378.7 percent rate increase (per 1,000 gallons) for the volumetric component for its Scott County non-residential Delaplain customers.¹⁰ Scott County argued that it has a special interest in the case not otherwise represented because the rate increase impacts rate affordability, health, safety, and economic development in Scott County.¹¹ Scott County, recognizing the Attorney General's role as an intervenor in this case, argued that the Attorney General's statutory role representing consumers in Commission proceedings does not preclude other governmental entities from representing their special interests as intervenors in Commission proceedings.¹²

From: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@scottky.gov>
Sent: Tuesday, February 3, 2026 10:06 AM
To: Joe Covington <joe.covington@scottky.gov>
Subject: Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Yes sir! Could you call me between 12:00 and 12:30? That's my only window, plus I'll have Ryan Pratt in my office then so it could work well.

Best Regards,

Matt Nunn

*This email was sent from my phone, please excuse the brevity.

From: Joe Covington <joe.covington@scottky.gov>
Sent: Tuesday, February 3, 2026 9:03:28 AM
To: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@scottky.gov>
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Would you have time for a phone call today? JPC

From: Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@scottky.gov>
Sent: Monday, February 2, 2026 5:06 PM
To: Joe Covington <joe.covington@scottky.gov>
Subject: FW: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Hello,

Can you update me on the situation and the fiscal court's efforts?

Best Regards,

Matt

From: manuel jimenez [REDACTED]

Sent: Sunday, February 1, 2026 7:23 PM

To: PSC Public Comment <PSC.Comment@ky.gov>; Hampton, Tony (State Rep.) (LRC)

<Tony.Hampton@ky.gov>; Nunn, Matt (State Sen.) (LRC) <Matt.Nunn@ky.gov>

Subject: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC

Manuel Eduardo Jimenez

100 Devin Dr.

Georgetown, KY 40312

Date: December 27th, 2025

Kentucky Public Service Commission

Post Office Box 615

Frankfort, Kentucky 40602

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Please confirm receipt of this request and include me on the service list for all future filings in this matter.

Respectfully submitted,

Manuel Edwadro Jimenez



David Spenard <dspenard@strobobarkley.com>

RE: Bluegrass Water, LLC, KPSC Case No. 2025-00354

1 message

Larry [REDACTED]
To: David Spenard <dspenard@strobobarkley.com>

Tue, Jan 13, 2026 at 2:12 PM

Attention Mr.Spenard, Please see the following letter to your office, and the Attorney General, Office of Rate Intervention.

Office of Rate Intervention
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601

cc: **David E. Spenard**

STROBO BARKLEY PLLC

730 West Main Street, Suite 202

Louisville, Kentucky 40202

RE: Bluegrass Water, LLC, KPSC Case No. 2025-00354

Dear sir of madam,

Please see the web links below from the South Carolina Public Service Commission Docket No. 2024-28-S. These PDF documents contain the official sworn testimonies of the following individuals:

Daniel P. Hunnell II, Deputy Director, Water Operations, Office of Regulatory Staff (ORS).

Dawn M. Hipp, Chief Operating Officer, Office of Regulatory Staff ("ORS").

Alan Mehrzad, Senior Regulatory Analyst, Water Operations, Office of Regulatory Staff (ORS).

The testimonies of these South Carolina state officials provide irrefutable documented evidence that CSWR President Josiah Cox and other corporate executives knowingly, and with willful intent, did make false and deliberately misleading statements to the South Carolina Public Service Commission in Docket No. 2024-28-S.

Furthermore, relative portions of the testimony of Mr. Cox and other CSWR executives is identical in the Public Service Commission cases in every state in which they operate utilities.

Therefore, these testimonies, when compared to the documented statements of Mr. Cox and other CSWR executives in prior and current CSWR/Bluegrass Water, LLC cases brought before the Kentucky Public Service Commission offer irrefutable evidence that should be directly relevant and beneficial to your intervention in KPSC Case No. 2025-00354, as well as rendering all previous Bluegrass Water, LLC cases brought before the Commission invalid.

DIRECT TESTIMONY AND EXHIBIT OF DANIEL P. HUNNELL II ON BEHALF OF THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF DOCKET NO. 2024-28-S

<https://dms.psc.sc.gov/Attachments/Matter/4191dce6-ae8e-43f3-8894-bfdf101fbb8a>

DIRECT TESTIMONY AND EXHIBIT OF DAWN M. HIPPO ON BEHALF OF THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF DOCKET NO. 2024-28-S

<https://dms.psc.sc.gov/Attachments/Matter/0ef06e84-e8da-4af0-9790-0bd2d06d8221>

DIRECT TESTIMONY AND EXHIBITS OF ALAN MKHRZAD ON BEHALF OF THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF DOCKET NO. 2024-28-S

<https://dms.psc.sc.gov/Attachments/Matter/c347cedf-89ea-43fe-943d-e5e024d403e5>

Sincerely,

Larry Averitt, Administrator
Bluegrass Water Resistance