COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF	)	
BLUEGRASS	)	
WATER UTILITY OPERATING	)	
COMPANY, LLC	)	**CASE NO. 2025-00354**
FOR AN ADJUSTMENT OF WATER AND	)	
SEWER RATES	)	

DIRECT TESTIMONY

AND EXHIBITS OF

JOHN DEFEVER, CPA

ON BEHALF OF THE

OFFICE OF THE ATTORNEY GENERAL OF

THE COMMONWEALTH OF KENTUCKY

AND

SCOTT COUNTY, KENTUCKY

AUGUST 13, 2026

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I. INTRODUCTION

Q. What is your name, occupation, and business address?

A. My name is John Defever. I am a Certified Public Accountant, licensed in the State of Michigan. I am a senior regulatory consultant in the firm of Larkin & Associates, PLLC, with offices at 15728 Farmington Road, Livonia, Michigan.

Q. Please describe the firm Larkin & Associates, PLLC.

A. Larkin & Associates, PLLC is a Certified Public Accounting and Regulatory Consulting Firm. The firm performs independent regulatory consulting primarily for public service/commission staffs, and consumer interest groups (attorneys general, public counsels, public advocates, consumer counsels, etc.). Larkin & Associates, PLLC, has extensive experience in the utility regulatory field as expert witnesses in over 600 regulatory proceedings including numerous electric, gas, telephone, and water and sewer utilities.

Q. Have you prepared an exhibit describing your qualifications and experience?

A. Yes. I have attached Appendix I, which summarizes my experience and qualifications.

Q. On whose behalf are you appearing?

A. Larkin & Associates, PLLC was retained by the Office of the Attorney General of the Commonwealth of Kentucky ("Attorney General" or "OAG") and Scott County, Kentucky ("Scott County"). Accordingly, I am appearing on behalf of the Attorney General and Scott County.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to review and make recommendations regarding specific issues that affect Bluegrass Water Utility Operating Company, LLC's ("Bluegrass Water" or "Company") requested increases in water and wastewater rates.

Q. How will your testimony be organized?

A. The testimony is organized as follows: Introduction, Overall Financial Summary, Rate Base Adjustments, Operating Adjustments and Conclusion.

II. OVERALL FINANCIAL SUMMARY

Q. Have you prepared any exhibits in support of your testimony?

A. Yes. I have prepared Exhibit JD-1 Water and JD-2 Wastewater, which summarize my adjustments and the impact on the Company's requested increases.

Q. Based on your review of Bluegrass Water's filing, what change in revenue requirement are you recommending at this time?

A. Based on the adjustments that have been quantified to date, the results are a revenue increase of no more than $90,387 for water and $2,398,919 for wastewater.

III. RATE BASE ADJUSTMENTS

A. Randview Stranded Costs

Q. What amount has the Company included for stranded costs related to the Randview investment?

A. The Company requests recovery of $173,410 of unrecovered Randview investment, $17,341 per year via expense and $15,181 as a return on investment in its wastewater revenue requirement.[1] At the time the Company sold Randview to Mayfield for $100,000, the Company's investment, net of accumulated depreciation was $173,410.[2]

Q. Should Bluegrass ratepayers be responsible for this cost?

A. No. The Company made the decision to purchase Randview. The risk of eventually selling Randview at a loss was taken by the Company with no input or agreement from ratepayers. Ratepayers should not be on the hook for the Company's investment. In addition, Randview is serving a customer base distinct from Bluegrass customers. Bluegrass customers should not be responsible for the costs related to a system serving a different set of ratepayers.

[1] Exhibit 7 Redlined Testimony of Brent Thies, p. 45, filed June 8, 2026.
[2] Id., p. 42.

Q. How does the Company justify inclusion of this cost?

A. The Company claims that if not allowed to recover stranded costs, companies will be afraid to invest in a troubled system that could be acquired by a neighboring system stranding investment.[3]

Q. Do you agree with this justification?

A. No. It is not Bluegrass ratepayers' responsibility to riskproof the Company's investments to comfort other Companies that are considering making investments.

Q. What do you recommend?

A. I recommend disallowance of all costs related to the Randview stranded investment, a reduction of $164,740[4] to wastewater rate base and $17,341 to annual wastewater amortization expense which are shown in Exhibit JD-2, Schedules B-2 and C-7.

B. Cash Working Capital

Q. How has the Company calculated its cash working capital?

[3] Id., p.45.
[4] This is the 13 month average reflected in the Company's filing in Amended Exhibit 9 tab_RB TY 13-Month Avg Wastewater.

A. The Company used the 1/8 method as it has in previous cases.[5] In the 1/8 method, cash working capital is calculated by multiplying the total operating expenses by 1/8.[6]

Q. Is this method reliable?

A. No. The 1/8 method is a very crude tool which is insufficient for determining an accurate level of cash working capital. For example, one extreme flaw is that this method cannot provide a negative cash working capital amount which can and does occur. In the case where the Company actually has a cash working capital surplus, the 1/8 method will result in a cash working capital deficiency which will harm ratepayers.

Q. What do you recommend?

A. I recommend the Company perform a lead lag study in future rate cases to support its cash working capital request as this method is more appropriate.

Q. Have you made any adjustments to cash working capital?

A. Yes, I have reflected the impacts of my operating expense adjustments in the cash working capital calculation. My adjustments reduce CWC by $1,102 for water and $26,100 for wastewater. The reductions are shown on Exhibit JD-1, Schedule B-1 and JD-2, Schedule B-1.

[5] Id., p. 35-36.
[6] Id.

IV. OPERATING ADJUSTMENTS

C. Late Fees

Q. What amounts has the Company included in the forward-looking test period for late fees?

A. The Company has reflected $14,244 in the forward-looking test period for wastewater[7] which is the annual level approved in the last rate case[8] and $0 late fees for water.[9]

Q. Why didn't the Company include late fees for water customers in the forward-looking test period?

A. The Company has not historically charged late fees to water customers.[10] The Company is requesting the Commission's approval to charge the same late fee rate of 10% to its water customers that it charges to its wastewater customers.[11].

[7] The Company's response to the Attorney General's First Request Item 121.
[8] The Company's response to the Attorney General's Fourth Request Item 20.
[9] The Company's response to the Attorney General's First Request Item121.
[10] Id.
[11] Exhibit 7 Redlined Thies Testimony, p. 48, filed June 8, 2026.

Q. Do you agree with the amounts included by the Company in the forward-looking test period?

A. No. As can be seen in the chart below, the Company has collected well in excess of the $14,244 it has included in the forward-looking test period for wastewater late fees.

Year	Wastewater Late Fee Revenue
2024	$ 46,915
2025	$ 57,708
2026 YTD thru June	$ 25,503 [12]

Q. Did the Company estimate an amount for water late fees?

A. Yes. The Company estimated that $5,023 would have been collected during the period November 2024-October 2025 had the 10% late fee been applied to water customers.[13] In addition the Company calculated the late fees that would have been collected for the periods below:[14]

[12] Exhibit 7 Redlined Thies Testimony, pp. 51-52 filed June 8, 2026 and the Company's response to Attorney General's Fourth Request Item 18.
[13] Exhibit 7 Redlined Thies, p. 54 filed June 8, 2026.
[14] The Company's response to the Attorney General's Fourth Request Item 21.

Year	Estimated Water Late Fee Revenue
2024	$ 5,543
2025	$ 5,120
2026 YTD	$ 2,445

Q. What do you recommend?

A. I recommend that the 2025 annual amount of late fee revenue of $57,708 be reflected for wastewater as this is the most known and measurable amount. For water, I recommend using $5,120, the Company's estimated amount of late fee revenue that would have been collected in 2025 if the 10% rate had been applied. These amounts should be reflected as an increase to revenue in the forward-looking test period. My adjustments are reflected in Exhibit JD-1 Schedule C-1 (water) and Exhibit JD-2 Schedule C-1 (wastewater).

Q. Do you have any further concerns regarding late fees?

A. Yes, in the prior case, the Commission directed the Company to "track all invoice late fees and record them as a regulatory asset or liability to the extent that they exceed the $14,244 in late fee revenues."[15] The result was that the Company overcollected late fees of $87,394 from 2024 through year-to-date 2026.[16]

[15] Exhibit 7 Redlined Testimony of Thies filed June 8, 2026, p. 51.
[16] Exhibit JD-2, Schedule C-2.

Q. What is the Company proposing?

A. The Company is proposing to retain these amounts that it has overcollected.[17]

Q. What do you recommend?

A. I recommend amortizing the overcollection of the wastewater late fees of $87,394 from 2024-2026 year-to-date ($32,671 + $43,464 + $11,259) over three years, or $29,131 annually. My adjustment is reflected in Exhibit JD-2 Schedule C-2 (wastewater). A three-year amortization is consistent with the three-year amortization period used by the Company for rate case expense.[18] This is also comparable to the timing of the company's filing of recent rate cases which is illustrated below.

- Case No. 2020-00290 (water and wastewater filed 10/1/2020)
- Case No. 2022-00432 (wastewater filed 2/27/2023) 29 months
- Case No. 2025-00354 (water and wastewater filed 12/11/2025) 31 months

D. Health Insurance Premiums

Q. What amount has the company included for health insurance premiums?

[17] Exhibit 7 Relined Thies Testimony, pp. 52-53.
[18] Exhibit 15.

A. According to Amended CONFIDENTIAL Exhibit 16 "Analysis of Employee Compensation," the total annual health coverage cost is [redacted] The Company states that 1% of the healthcare cost is paid by the employees.[20] However, the Company's request is inconsistent with the ruling in the Company's last rate case, Case No. 2022-00432 which states:

> The Commission has placed greater emphasis on evaluating employee total compensation packages for market and geographic competitiveness to ensure fair rate development and has generally determined that 100 percent employer-funded health and dental care does not meet that criteria. In every general rate case filed since 2016 in which a utility sought to recover its expenses for the payment of 100 percent of its employees' health insurance premiums, the Commission has reduced test year expenses for health insurance premiums to levels based on national average employee contribution rates. It is Commission practice that, in the absence of any compensation policy or benefits study regarding insurance benefits, an adjustment should be made to employee insurance expense to bring the employee contributions in line with the BLS average employer contribution percentages for health insurance and the Willis Benefits Benchmarking Survey for dental insurance. The Commission does not see any material difference between a utility paying 99 percent of the premiums and 100 percent of the premiums.
>
> While Bluegrass Water did obtain a wage and benefit study as part of this rate case, that study did not support CSWR's continued payment of 99 percent of employee's insurance benefits. Notably, the report actually indicated that CSWR is an outlier with respect to health insurance contributions when compared to the peer companies listed in the report, which all had employer/employee contribution rates of $595/$140, $630/$157, and $588/$105 for employee-only plans and lower contribution rates for family plans.[21]

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19 The Company's Confidential Response to The Attorney General's Third Request Item 15.
20 The Company's response to the Attorney General's First Request Item 39.
21 Order, pp. 69-70.

Q. Did the Company provide a compensation study in this case?

A. No. AG 1-95 requested copies of studies that support the company's payments of 99 percent of health benefits as a benefit to ratepayers. The Company's response did not provide any studies but stated:

> CSWR, LLC, operates and supports regulated water and wastewater utilities across multiple states, many of which are small or formerly distressed systems. Providing a competitive benefits package, including employer-funded healthcare, which enables CSWR, LLC, to attract and retain experienced professionals in finance, engineering, compliance, operations, and regulatory reporting allows CSWR to attract employees that allow it to maintain regulatory compliance, system reliability, and financial integrity for Bluegrass Water. Without a competitive benefits package, CSWR may not be able to attract talented individuals to allow it operate Bluegrass Water prudently.

Q. What do you recommend?

A. I recommend that the Company be held to the standards set in its prior rate case and reflect a reduction to medical expense to align with the most recent BLS average.

Q. Did the Company provide the amount to reduce the revenue requirement to correspond to the BLS average?

A. No. As such, I calculated the reduction of medical expense to correspond with the BLS average. This results in a reduction of $1,635 to water and $13,283 to wastewater which are reflected in Exhibit JD-1 Schedule C-2 (water) and Exhibit JD-2 Schedule C-3 (wastewater)

E. Lobbying

Q. Has the Company included costs for lobbying in the forward-looking test period?

A. Yes. The Company has included [redacted] for wastewater for lobbying expenses in the forward-looking test period related to governmental affairs.[22]

Q. Should this amount be recovered from ratepayers?

A. No. Lobbying is considered a below-the-line cost, not recoverable from ratepayers.

Q. What is your recommendation?

A. I recommend disallowance of all lobbying costs, a reduction of [redacted] for wastewater in the forward-looking test period. My adjustments are reflected in Exhibit JD-1 Schedule C-3 (water) and Exhibit JD-2 Schedule C-4 (wastewater).

F. Rate Case Expense

Q. What amount has the Company included for rate case expense?

[redacted]

A. The Company has included $18,256 annually for current rate case expense in the water revenue requirement. [23] The Company has included $173,410[24] for current rate case annual expense plus $201,670 of unamortized rate case expense from the prior rate case in the wastewater revenue requirement.[25]

Q. What is your other concern with this expense?

A. I do not agree with the Company's treatment of the prior rate case expense for wastewater in the forward-looking test period. The $201,670 represents monthly amortization of $40,333.93 for the months August – December of 2026.[26] The prior rate case expense will be fully amortized on December 31, 2026. If the $201,670 is included in the forward-looking test period, the Company will continue to collect this full amount until the next rate case.

Q. What do you recommend?

A. I recommend amortizing the $201,670 over three years, or $67,223 per year. This is a reduction of $134,447 ($201,670-$67,223) as shown on Exhibit JD-2, Schedule C-8 (wastewater).

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23 Exhibit 15.
24 Exhibit 15.
25 The Company's response to the Attorney General's First Request Item 151.
26 The Company's response to the Attorney General's First Request Item 151.

Q. Is this consistent with the Commission's treatment of unamortized rate case expense in other rate cases in Kentucky?

A. Yes. In Case No. 2025-00122, the Commission required that the remaining unamortized rate case expense balance from the prior case be re-amortized over three years. The order stated:

> The Commission finds that the Attorney General/LFUCG's recommendation to amortize the remaining 2023 Rate Case Expense for an additional three years is reasonable and should be accepted because, if the full unamortized balance of Kentucky American's 2023 Rate Case Expenses is recovered in the test year, then Kentucky American would be authorized to recover that amount each year until its next base rate case, and would ultimately begin over-collecting it's 2023 Rate Case Expense from its customers.[27]

G. Uncollectible Expense

Q. **What amount has the company included for uncollectible expense in the forward-looking test period?**

A. The Company has included $2,614 and $26,979 for uncollectible expense in the forward-looking test period for water and wastewater, respectively.[28]

Q. **How did the Company calculate uncollectible expense?**

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[27] Page 27.

[28] Exhibit 14 Relined Testimony of Caitlin OReilly, p.13, filed June 8, 2026

A. The Company calculated uncollectible expense at 1% percent of gross revenues.[29] The Company then applied that percentage to its requested forward-looking test period revenues.[30]

Q. **Do you agree with the Company's method for calculating this expense?**

A. No. The Company's method relies on estimates to calculate estimates.

Q. Did the Company support the 1% bad debt ratio?

A. No. The Company's response to the Attorney General's Third Request No. 71 states:

> The Company does not maintain formal documentation supporting the selection of the 1% bad debt ratio. However, the Company's 2024 write-offs exceeded the amount that would be produced by a 1% bad debt factor. Based on this historical experience, the Company believes that a 1 percent bad debt expense is reasonable and conservative.

Q. Did the Company propose the same 1% bad debt factor in its prior rate case?

A. Yes, which was not accepted by the Commission. The order stated:

> Therefore, the Commission agrees with the Attorney General's position to use the direct write off method to determine bad debt...[31]

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[29] Id.
[30] Id., pp.13-14.
[31] Case No 2022-00432, Order p. 61.

Q. Did the Company provide the historical revenues, write-offs and recoveries?

A. The Company provided information for 2021- 2025 for water but only 2022-2025 for wastewater which I have illustrated below. [32]

	Water					
	2021	2022	2023	2024	2025	Reference
Revenue	$ 178,416	$ 272,492	$ 315,148	$ 261,366	$ 259,799	
Actual Write-offs	0	$ 469	$ 117	$ 8,709	$ -	
Recoveries	0	$ -	$ (987)	$ (2,086)		
Net writeoffs	0	$ 469	$ (870)	$ 6,623	$ -	AG 3-73
Bad Debt Expense	$ 1,863	$ 2,712	$ 2,743	$ 27,793	$ 31,394	AG 3-74

	Wastewater				
	2022	2023	2024	2025	Reference
Revenue	$2,369,324	$2,306,476	$2,789,112	$2,843,124	
Actual Write-offs	$2,537	$265	$91,914	$0	
Recoveries	($2,336)	($200)	($2,563)	$0	
Net writeoffs	$201	$65	$89,351	$0	AG 3-73
Bad Debt Expense		$28,652	$269,181	$30,809	AG 3-74

The charts above demonstrate that bad debt expense can be quite different from actual net write-offs

Q. Do you have any concerns?

A. Yes. As can be seen, there was a large amount of write-offs in 2024 for water and wastewater compared to other years.

32 The Company did not provide 2021 data for wastewater although it was requested.

Q. Did the Company explain the reason for the large level of write-offs in 2024?

A. Yes. The Company stated that:

> …in late 2024, the Company completed a detailed review of delinquent accounts and related billing records and recorded approximately $100,623 in additional write-offs attributable to prior year balances; this adjustment reflects the timing of the review and accounting true up rather than a sudden change in current year collections.[33]

The Company stated that it performs this review on an annual basis and will perform a similar review in 2026.[34] As can be seen from the charts above, the 2024 write-off was a large amount applicable to multiple years.

Q. Are there any other anomalies?

A. Yes. For water, recoveries were greater than write-offs in 2023.

Q. What is your recommended adjustment?

A. I recommend using an average of the ratio of historical net write-offs (write-offs less recoveries) to revenues and applying that to the forward-looking test period revenues, to forecast the forward-looking test year period of uncollectible expense. This method is more appropriate as it utilizes bad debts actually

[33] The Company's response to the Attorney General's First Request Item 51.
[34] The Company's response to the Attorney General's Third Request Item 72.

written off by the Company as well as amounts recovered. However, I recommend excluding the year 2024 from the average as it is an anomaly compared to the other years. I also excluded the year 2023 from the water average as it was also an anomaly. I recommend the use of a three-year (2021, 2022, and 2025) average of net write-offs to revenues for water which results in a write-offs to revenues ratio of 0.06%. This reduces uncollectible expense by $2,461 which is shown on Exhibit JD-1 Schedule C-4.

I recommend the use of a three-year (2022, 2023 and 2025) average of net write-offs to revenues for wastewater which results in a write-offs to revenues ratio of 0.0012%. I used a three-year average rather than four because I was only provided four years of data for wastewater and I am excluding 2024 as it is an anomaly compared to the other years. This reduces uncollectible expense by $26,945 which is shown on Exhibit JD-2, Schedule C-5.

H. Allocated Costs

Q. What amount did the Company include for allocated costs in the forward-looking test period?

A. For sewer, the Company included $453,097 and for water, the Company included $54,318 in the forward-looking test period.[35]

[35] The Company's response to the Attorney General's First Request Item 115.

Q. Do you agree with how the Company calculated those amounts?

A. No. The Company calculated the forward-looking test period amounts by applying inflation.[36] However, as the following chart shows, these costs fluctuate over time.[37] As such, assumed inflation is unwarranted. It should be noted that the Company did not provide 2021-2022 amounts for sewer although they were requested.[38]

	Sewer	Water
2021		$40,153
2022		$37,219
2023	$439,737	$38,906
2024	$553,661	$66,504
2025	$437,160	$52,414

Q. What method do you recommend?

A. I recommend the use of the 2025 calendar year amounts as they are the most known and measurable. I would have recommended the use of an average but the Company changed its allocation methodology in 2024 making the prior years not appropriate for comparison.[39]

Q. What is your recommended adjustment?

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[36] The Company's response to the Attorney General's Fourth Request Item -23.
[37] The Company's response to the Attorney General's First Request Item 115 and The Company's response to the Attorney General's Third Request Item 14.
[38] The Company's response to the Attorney General's First Request Item 115.
[39] The Company's response to the Attorney General's Third Request Item 14.

A. The use of the 2025 amounts for shared services results in a reduction of $1,904 to water and $15,937 to wastewater as shown on Exhibit JD-1, Schedule C-5 and Exhibit JD-2, Schedule C-6.

I. Unaccounted for Water

Q. Did the Company make an adjustment in the forward-looking test period for its unaccounted-for water ("UFW") loss above 15 percent, as required by 807 KAR 5:066, Section 6(3)?

A. No. The Company stated the following:

> …Bluegrass Water did not include an adjustment for unaccounted for water exceeding 15% for either the base period or the test period. Bluegrass Water does not have water meters to measure the water sold to calculate unaccounted for water.[40]

Q. Do the Company's affiliates in other states track unaccounted for water?

A. I don't know. The Company was asked about that in AG 3-76 but declined to provide the information stating that it was irrelevant.

Q. What is required by 807 KAR 5:066, Section 6(3)?

A. 807 KAR 5:066, Section 6(3) states:

> …[f]or rate making purposes a utility's unaccounted-for water loss shall not exceed fifteen (15) percent of total water produced and purchased, excluding water used by a utility in its own operations. Upon application by a utility in a rate case filing or by separate filing, or upon motion by the commission, an alternative level of reasonable unaccounted-for water loss may be established by the commission. A utility proposing an alternative level shall

[40] The Company's response to the Attorney General's First Request Item 173.

have the burden of demonstrating that the alternative level is more reasonable than the level prescribed in this section.

Q. Should ratepayers be responsible for excess unaccounted for water costs simply because the Company does not track them?

A. No. The Company's failure to track this information should not create an obligation for ratepayers nor in any other way negatively impact them. If the Company is allowed to avoid responsibility for excess unaccounted for water costs by not tracking them this creates an incentive to avoid tracking such costs.

Q. What do you recommend?

A. As the Company failed to provide the information with which to calculate this adjustment, I have used an average of unaccounted for water percentage from five other Kentucky water companies in an attempt for my adjustment to be as relevant and fair as possible. The included companies were Kentucky American Water Company[41], Graves County Water District[42], Bath County Water District[43], Allen County Water District[44], and North McLean County Water District[45]. The group averaged 6.93% as shown below.

[41] Order Case No. 2025-00122, p. 35.
[42] Order Case No. 2025-00060, p. 5.
[43] Order Case No. 2025-00132, p. 5.
[44] Order Case No. 2025-00014, p. 5.
[45] Order Case No. 2025-00009, p. 5.

Company	Unaccounted for Water in excess of 15%
KAWC	2.60%
Graves	16.94%
Bath	0.06%
Allen	5.92%
McLean	9.11%
AVG	6.93%

Applying this average percentage to the Company's chemical and purchased power expenses results in a reduction for unaccounted for water of $2,481. The calculation is shown on Exhibit JD-1, Schedule C-6. It should also be noted that in each of those cases, the Commission determined that an adjustment for unaccounted for water was appropriate

Q. Do you consider this calculation to be valid?

A. Given the complete lack of information provided by the Company, I applied what I consider to be the most relevant information to the calculation. It is the Company's burden to support its request and the Company has failed to indicate its level of unaccounted for water or suggest a method to calculate it. As such, this is the best option of which I am aware. As the Company had the burden and failed to meet it, any resultant errors should be their responsibility, not the responsibility of the ratepayers.

A. Flow Through Adjustments

Income Taxes

Q. Please discuss your adjustment to income tax.

A. The adjustment is a flow-through from my adjustments to O&M revenues and expenses. All of my O&M expense reductions effectively increase operating income. As a result, income tax is increased. My adjustments increase federal income taxes and state income taxes by $3,508 for water and $70,931 for wastewater in the forward-looking test year, as shown on Exhibit JD-1, Schedule C-7 and Exhibit JD-2, Schedule C-9.

Interest Synchronization

Q. Please discuss your adjustment to interest synchronization.

A. The adjustment is a flow-through from my adjustments to rate base. As my adjustments to rate base decreases rate base, it has the effect of decreasing interest expense which increases income tax expense. My adjustment increases income tax expense by $2,102 for water and $14,413 for wastewater in the forward-looking test period as shown on Exhibit JD-1, Schedule C-8 and Exhibit JD-2, Schedule C-10.

V. Conclusion

Q. Does this conclude your testimony?

A. Yes. However, I reserve the right to supplement my testimony upon receipt of additional relevant information. It should be noted that silence on any issues should not be interpreted as acceptance of any Company proposal.

APPENDIX I - QUALIFICATIONS OF JOHN DEFEVER

John Defever, CPA is a regulatory consultant with Larkin & Associates. As such, Mr. Defever is responsible for the review and analysis of regulatory filings and the preparation of testimony, discovery requests, briefs, schedules, exhibits and reports. Mr. Defever also assists with the annual audit of a Michigan Railroad Company. Mr. Defever has been employed with the firm of Larkin and Associates since 2010.

Mr. Defever has performed work in the field of utility regulation on behalf of public service commission staffs, state attorney generals and consumer groups concerning regulatory matters before regulatory agencies in Alaska, California, Connecticut, District of Columbia, Florida, Hawaii, Iowa, Maine, Maryland, Massachusetts, Mississippi, Oregon, New Hampshire, and Vermont.

Mr. Defever received a Bachelor of Business Administration, Major: Accounting from Eastern Michigan University and an Associate in Applied Science at Schoolcraft College. Mr. Defever is a member of the Michigan Association of Certified Public Accountants and maintains continuing professional education in accounting, auditing, and taxation.

Partial list of utility cases participated in:

Docket No. 10-02-13	Aquarion Water Company of Connecticut Connecticut Department of Utility Control
Docket No. 10-70	Western Massachusetts Electric Company Massachusetts Department of Public Utilities
Docket No. 10-12-02	Yankee Gas Services Company Connecticut Department of Utility Control
Docket No. 11-01	Fitchburg Gas & Electric Light Company Massachusetts Department of Public Utilities
Case No. 9267	Washington Gas Light Company Maryland Public Service Commission

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Case No. 9286	Potomac Electric Power Company Maryland Public Service Commission
Docket No. 13-06-08	Connecticut Natural Gas Corporation Connecticut Public Utility Regulatory Authority
Docket No. 13-90	Fitchburg Gas & Electric Light Company Massachusetts Department of Public Utilities
Docket No. 8190	Green Mountain Power Company Before the Vermont Public Service Board
Docket No. 8191	Green Mountain Power Company Alternative Regulation Before the Vermont Public Service Board
Case No. 9354	Columbia Gas of Maryland, Inc. Maryland Public Service Commission
Docket No. 13-135	Western Massachusetts Electric Company Massachusetts Department of Public Utilities
Docket No. 14-05-06	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 13-85	Massachusetts Electric Company and Nantucket Electric Company D/B/A/ as National Grid Massachusetts Department of Public Utilities
Case No. 9390	Columbia Gas of Maryland, Inc. Maryland Public Service Commission
Docket No. 15-03-01	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 15-03-02	United Illuminating Company Connecticut Public Utilities Regulatory Authority.

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Docket No. 15-149	Western Massachusetts Electric Company Massachusetts Department of Public Utilities
Docket No. 8710	Vermont Gas Systems Inc. Before the Vermont Public Service Board
Docket No. 8698	Vermont Gas Systems Inc. Alternative Regulation Before the Vermont Public Service Board
U-15-091 / U-15-092	College Utilities Corporation Golden Heart Utilities, Inc. Regulatory Commission of Alaska
Docket No.16-06-04	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. 15-05-42	Southern Connecticut Gas Company Connecticut Public Utilities Regulatory Authority
Docket No. 20160251-EI	Florida Power & Light Company Florida Public Service Commission
Docket No. 20170141-SU	KW Resort Utilities Florida Public Service Commission
Application No. A.16-09-001	Southern California Edison California Public Utilities Commission
Case No. 18-0409-TF	Vermont Gas Systems, Inc. Vermont Public Utility Commission
Docket No. 17-10-46	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 2017-0105	Hawaii Gas Company Hawaii Public Utilities Commission

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Docket No. 18-03-01	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 18-03-02	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. A.17-11-009	Pacific Gas & Electric California Public Utilities Commission
Docket No. 18-05-16	Connecticut Natural Gas Connecticut Public Utilities Regulatory Authority
Docket No. 18-05-10	Yankee Gas Connecticut Public Utilities Regulatory Authority
Docket No. 18-11-12	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 18-07-10	SJW Group and Connecticut Water Service Connecticut Public Utilities Regulatory Authority
Docket No. 2018-0388	Kona Water Service Company Hawaii Public Utilities Commission
Docket No. RPU-2019-0001	Interstate Power and Light Iowa Utilities Board
Docket No. DE 19-057	Public Service Company of New Hampshire New Hampshire Public Utilities Commission
Application No. A.19-08-013	Southern California Edison Public Utilities Commission
Docket No. D.P.U. 19-120	NSTAR Gas Company d/b/a Eversource Energy Massachusetts Department of Public Utilities
Docket No. 2019-00333	Maine Water Company – Skowhegan Division Public Utilities Commission

APPENDIX I - QUALIFICATIONS OF JOHN DEFEVER

Docket No. D.P.U. 19-113	Massachusetts Electric Company & Nantucket Electric Company Each d/b/a National Grid
Docket No. 20-03-01	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 20-03-02	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. 20-12-30	Connecticut Water Company Connecticut Public Utilities Regulatory Authority
Docket No. 20-08-03	The Connecticut Light and Power Company & The United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. 20-120	National Grid Massachusetts Department of Public Utilities
Docket No. 21-01-03	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 21-01-04	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Case No. 21-887-EL-AIR	Duke Energy Ohio Public Utilities Commission of Ohio
Application No. 21-06-021	Pacific Gas & Electric 2023 GRC California Public Utilities Commission
Docket No. 22-07-01	Aquarion Water Company Connecticut Public Utilities Regulatory Authority
Docket No. 22-01-03	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority

APPENDIX I - QUALIFICATIONS OF JOHN DEFEVER

Docket No. 22-01-04	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. 22-057-03	Dominion Energy Resources Utah Public Service Commission
Docket No. 22-22	NSTAR Electric Massachusetts Department of Public Utilities
Docket No. 22-143	NSTAR Storm Massachusetts Department of Public Utilities
Docket No. 22-08-08	United Illuminating Company, Connecticut Public Utilities Regulatory Authority
Formal Case No. 1169	Washington Gas Light District of Columbia Public Service Commission
Case No. 22-900-EL-SSO	Dayton Power & Light, d/b/a AES Ohio Public Utilities Commission of Ohio
Docket No. 23-08-32	Connecticut Water Company Connecticut Public Utilities Regulatory Authority
Docket No. 23-01-03	Connecticut Light & Power Company Connecticut Public Utilities Regulatory Authority
Docket No. 23-01-04	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Case No. 2023-00147	Taylor Country Rural Electric Cooperative Before The Public Service Commission
Docket No. DE-23-039	Liberty Electric New Hampshire Public Utilities Commission
Docket No. DG-23-039	Liberty Gas New Hampshire Public Utilities Commission

APPENDIX I - QUALIFICATIONS OF JOHN DEFEVER

Docket No. 23-24	National Grid Storm Massachusetts Department of Public Utilities
Docket No. 23-150	National Grid Rate Case Massachusetts Department of Public Utilities
Application No. 23-05-010	Southern California Edison California Public Utilities Commission
Case No. 2024-00092	Columbia Gas Kentucky of Kentucky, Inc. Before The Public Service Commission
Docket No. R-2024-3046931	PECO Energy Company-Electric Division Pennsylvania Public Utility Commission
Docket No. R-2024-3046932	PECO Energy Company-Gas Division Pennsylvania Public Utility Commission
Docket No. 24-12-01	Yankee Gas Connecticut Public Utilities Regulatory Authority
Docket No. 24-10-04	United Illuminating Company Connecticut Public Utilities Regulatory Authority
Docket No. 24-03-30	Eversource Energy Storm Connecticut Public Utilities Regulatory Authority
D.P.U. 24-41	National Grid Storm Massachusetts Department of Public Utilities
D.P.U. 25-143	NSTAR Electric Company

APPENDIX I - QUALIFICATIONS OF JOHN DEFEVER

	Massachusetts Department of Public Utilities
D.P.U. 25-61	National Grid Storm Massachusetts Department of Public Utilities
Case No. 2025-00122	Kentucky American Water Company Before The Public Service Commission
Case No. 2025-00277	Kentucky Frontier Gas Before The Public Service Commission
Case No. 2026-00099	Columbia Gas Before The Public Service Commission
Case No. 2026-00094	Kentucky American Water Company Before The Public Service Commission
Case No. 2026-00043	Central Maine Company Maine Public Utilities Commission
Case No. 2026-00049	Unitil Maine Public Utilities Commission

AFFIDAVIT

STATE OF MICHIGAN)

COUNTY OF WAYNE)

John Defever, being duly sworn, deposes, and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.

John Defever

Sworn to and subscribed before me on this 13th day of August 2026.

Christine Miller

Notary Public

CHRISTINE MILLER
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES Nov 8, 2028
ACTING IN COUNTY OF Wayne