

EXHIBIT

11

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF)
BLUEGRASS WATER UTILITY) Case No. 2025-00354
OPERATING COMPANY, LLC FOR)
AN ADJUSTMENT TO ITS RATES)

DIRECT TESTIMONY

OF

EMILY M. HARLOW

ON BEHALF OF

BLUEGRASS WATER UTILITY OPERATING COMPANY, LLC

FILED: December 11, 2025

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DIRECT TESTIMONY OF

EMILY M. HARLOW

Table of Contents

I. INTRODUCTION 3

II. WASTEWATER REVENUES 4

 1. WASTEWATER TARIFF DESCRIPTION 4

 2. BASE PERIOD WASTEWATER REVENUES 7

 3. FORWARD-LOOKING WASTEWATER REVENUES 10

III. WATER REVENUES 16

 1. WATER TARIFF DESCRIPTION 16

 2. BASE PERIOD WATER REVENUES 16

 3. FORWARD-LOOKING WATER REVENUES 17

IV. OTHER REVENUES 18

V. CONCLUSION 22

1 **DIRECT TESTIMONY OF**

2 **EMILY M. HARLOW**

3
4 **I. INTRODUCTION**

5 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

6 A. My name is Emily M. Harlow, and my business address is 1630 Des Peres Rd., Suite
7 140, St. Louis, MO 63131.

8
9 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

10 A. I am employed by CSWR, LLC (“CSWR”). My current position is Manager of Rates
11 and Revenue.

12 **Q. ON WHOSE BEHALF ARE YOU FILING THIS DIRECT TESTIMONY?**

13 A. I am filing on behalf of Bluegrass Water Utility Operating Company, Inc. (“Bluegrass
14 Water” or “Company”), which is a subsidiary of CSWR, LLC.

15
16 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**
17 **EXPERIENCE.**

18 A. I graduated from Millikin University in 2001 with a Bachelor of Science degree in
19 Accounting. I graduated from Illinois State University in 2004 with a Master of
20 Business Administration. I have over 25 years of experiences in the electric, gas and
21 water utility sector as a utility employee with Ameren Corporation, American Water
22 Service Company, Ohio Valley Gas, Inc., and now CSWR, LLC.
23
24
25
26

1 **Q. WHAT ARE YOUR CURRENT EMPLOYMENT RESPONSIBILITIES?**

2 A. My current responsibilities include analyzing revenue and sales units, reviewing
3 monthly billing data, auditing rates in the billing system, and rate case preparation.
4

5 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE KENTUCKY
6 PUBLIC SERVICE COMMISSION (“COMMISSION”)?**

7 A. While I have testified several times before the Indiana Utility Regulatory
8 Commission, this is my first time testifying before the Kentucky Public Service
9 Commission.
10

11 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS
12 CASE?**

13 A. The general purpose of my testimony is to quantify revenues based on current rates,
14 both for the base period and for inclusion in the forward-looking test period.
15

16 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

17 A. Yes. I am sponsoring the following exhibits to my testimony:
18
19 EMH-1 Bluegrass Water Revenue Forecast
20 EMH-2 Delaplain Non-Residential Wastewater Forecast
21 EMH-3 Bluegrass Water Late Fees - Wastewater
22 EMH-4 Bluegrass Water Returned Check Fees – Wastewater

23 **II. WASTEWATER REVENUES**

24 **1. WASTEWATER TARIFF DESCRIPTION**

25 **Q. PLEASE DESCRIBE THE COMPANY’S CURRENT WASTEWATER
26 TARIFFS.**

1 A. As regards its wastewater operations, the Company has two tariffs currently in effect.
2 First, the Company has a tariff that is applicable to its customers in its
3 Commonwealth Wastewater service area (located in Boyle County, Kentucky). That
4 tariff has a single rate for residential service and was approved by the Commission
5 on September 15, 2008. That tariff was then adopted by the Company when it
6 acquired the system in late 2023.¹
7

8 Second, the Company has a consolidated wastewater tariff that was approved
9 in the Company's last general rate case (2022-00432). This consolidated tariff
10 includes a single residential, multi-residential, commercial, and Delaplain non-
11 residential rate. Additionally, following the completion of that rate case, separate
12 rates associated with the Company's acquisition of the Magruder Village and Yung
13 Farm Estates service areas were added to the consolidated tariff.² Thus, the
14 consolidated tariff is applicable to all wastewater customers other than the
15 Commonwealth Wastewater customers which are served pursuant to the previously
16 described Commonwealth Wastewater tariff.
17
18
19
20
21
22

23 ¹ See *In the Matter of: Electronic Joint Application of Bluegrass Water Utility Operating Company, LLC for Approval*
24 *of Acquisition and Transfer of Ownership and Control of Assets of Commonwealth Wastewater Systems, LLC, Yung*
25 *Farm Estate Homeowners' Association, Inc., and Moon River Marina and Resort, LLC*, Case No. 2023-00181, Order
26 at 20 (Ky. PSC Sept. 22, 2023).

² Recognizing that Magruder and Yung Farm Estates were both non-regulated systems, neither had Commission-
approved tariffs or rates. Thus, while the Company adopted the current rates being charged by the non-regulated
company, there were no Commission-approved tariffs to adopt. For this reason, the adopted rate was simply included
as a separate rate schedule in the consolidated tariff.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Q. PLEASE DESCRIBE THE RATES IN THE COMMONWEALTH WASTEWATER TARIFF.

A. The Commonwealth Wastewater tariff has a flat charge for residential service of \$34.92/month. There is no wastewater usage charge included in that tariff.

Q. PLEASE DESCRIBE THE RATES IN THE CONSOLIDATED TARIFF.

A. The consolidated tariff has different sets of rates that are applicable to: (1) Magruder Village, (2) Yung Farm Estates, (3) Delaplain non-residential, and (4) all the consolidated systems.

Magruder Village: The Magruder Village rates (Sheet No. 3.4), adopted following the acquisition of this non-regulated system, are \$35.00/month.

Yung Farm Estates: The Yung Farm Estates rates (Sheet No. 3.3), adopted following the acquisition of this non-regulated system, are \$60.00/month.

Delaplain Non-Residential Service: The Delaplain non-residential service rate (Sheet No. 3.2) is applicable to any not exclusively domestic or residential customer in the Delaplain service area. It includes a flat monthly rate of \$197.43 plus a usage component of \$11.67 for each 1,000 gallons.

Consolidated Systems: The consolidated system rates (Sheet Nos. 1.3 and 1.4) include: (1) a single residential rate of \$77.77/month, (2) a multi-residential rate of \$58.33/month/dwelling unit, and (3) a commercial rate of \$197.43/month.

1 2. BASE PERIOD WASTEWATER REVENUES

2 **Q. PLEASE DESCRIBE THE BASE PERIOD.**

3 A. As described more fully by Mr. Brent Thies, the Company is proposing a base period
4 consisting of 6 months of actual historical data (April 1, 2025 – September 30, 2025)
5 and six months of estimated data (October 1, 2025 – March 31, 2026). The Company
6 then proposes a forward-looking test period consisting of the 12-consecutive
7 calendar months of August 1, 2026, through July 31, 2027. In this section of my
8 testimony, I will describe the Company’s quantification of revenues for both the six-
9 month portion of the base period that relies on actual historical data and the six-
10 month portion of the base period that uses estimated data. In the following section,
11 I will describe my quantification of revenues for the forward-looking test period.

12 **Q. PLEASE PROVIDE THE ACTUAL WASTEWATER REVENUES ON A**
13 **PER-SYSTEM BASIS, BY THE VARIOUS ACCOUNT TYPES, FOR THE**
14 **PERIOD OF APRIL 2025 – SEPTEMBER 2025.**

15 A. The revenues are as follows:

16

17	System	Single Residential	Multi- Residential	Commercial (Non-Residential)	TOTAL
18	Airview	\$91,672			\$91,672
19	Arcadia Pines	\$10,732			\$10,732
20	Brocklyn	\$33,677	\$33,954		\$67,631
21	Carriage Park	\$17,734			\$17,734
22	Darlington Creek	\$53,163			\$53,163
23	Fox Run	\$16,801			\$16,801
24	Equestrian Woods (Springcrest)	\$19,598			\$19,598
25	Golden Acres	\$13,065			\$13,065
26					

1	Great Oaks	\$70,681		\$70,681
2	Herrington Haven	\$11,199		\$11,199
	Kingswood	\$60,624		\$60,624
3	Lake Columbia	\$15,398		\$15,398
4	LH Treatment	\$153,049		\$153,049
	Marshall Ridge	\$16,967		\$16,967
5	Persimmon Ridge	\$168,452	\$1,185	169,637
	River Bluffs	\$80,383		\$80,383
6	Timberland	\$30,809		\$30,809
7	Woodland Acres	\$40,536		\$40,536
	Delaplain	\$141,424	\$253,802	\$395,226
8	Magruder Village	\$3,360		\$3,360
9	Yung Farm Estates	\$7,200		\$7,200
	Commonwealth	\$2,724		\$2,724
10	Wastewater			

11 **Q. PLEASE EXPLAIN HOW YOU PROJECTED REVENUES FOR THESE**
12 **SYSTEMS FOR THE SIX MONTHS OF ESTIMATED DATA IN THE BASE**
13 **PERIOD.**

14
15 A. The residential billed customers are all on a flat monthly charge. A review of the
16 number of customers billed from 2022 through the present shows that there was no
17 organic residential customer growth in these systems. Given the lack of organic
18 growth, my projection of revenues for these systems simply utilized the monthly
19 billed customer count from the same month for the prior period (for example January
20 2025 was used for January 2026).

21
22 The one non-residential billed customer in Persimmon Ridge is also on a flat
23 monthly charge, and I followed the same methodology as residential customers to
24 determine this billing determinant.
25
26

1 As mentioned, the consolidated tariff includes a Delaplain non-residential
 2 charge that utilizes both a flat monthly charge and a usage charge. There has been
 3 no change in the billed non-residential customer count in the Delaplain service area.
 4 Water usage information is provided to Bluegrass Water by the water utility for
 5 purposes of billing the usage component. To project the Delaplain non-residential
 6 wastewater revenues associated with the usage component, I utilized a three-year
 7 average to determine the monthly usage (e.g., the prior three Januarys determined
 8 the usage for the January projection). Once all the billing determinants were
 9 calculated, they were applied to the respective rates to calculate revenue.

10 **Q. PLEASE PROVIDE THE TOTAL WASTEWATER REVENUES FOR THE**
 11 **BASE PERIOD.**

12 **A.** Attached are the base period wastewater revenues, on a per-system basis, including
 13 both the 6 months of actual historical and 6 months of estimated data:

14	System	Actual	Estimated	TOTAL
15		Data	Data	
16	Airview	\$91,672	\$91,501	\$183,172
17	Arcadia Pines	\$10,732	\$10,732	\$21,465
18	Brocklyn	\$67,631	\$67,400	\$135,030
19	Carriage Park	\$17,734	\$17,420	\$35,155
20	Darlington Creek	\$53,163	\$52,859	\$106,021
21	Fox Run	\$16,801	\$16,660	\$33,460
22	Equestrian Woods	\$19,598	\$19,598	\$39,196
23	(Springcrest)			
24	Golden Acres	\$13,065	\$13,065	\$26,131
25	Great Oaks	\$70,681	\$70,989	\$141,671
26	Herrington Haven	\$11,199	\$11,266	\$22,465
	Kingswood	\$60,624	\$60,612	\$121,237
	Lake Columbia	\$15,398	\$15,321	\$30,719

1	LH Treatment	\$153,049	\$152,992	\$306,041
2	Marshall Ridge	\$16,967	\$17,187	\$34,154
3	Persimmon Ridge	\$169,637	\$169,416	\$161,579
4	River Bluffs	\$80,383	\$81,196	\$161,579
5	Timberland	\$30,809	\$30,797	\$61,606
6	Woodland Acres	\$40,536	\$41,239	\$81,776
7	Delaplain	\$395,226	\$429,296	\$824,522
8	Magruder Village	\$3,360	\$3,360	\$6,720
9	Yung Farm Estates	\$7,200	\$7,200	\$14,400
10	Commonwealth	\$2,724	\$2,724	\$5,448
11	Wastewater			

3. FORWARD-LOOKING WASTEWATER REVENUES

Q. HOW DID YOU FORECAST WASTEWATER REVENUES FOR THE FORWARD-LOOKING TEST PERIOD.

A. Any projection of wastewater revenues must focus on the variables that will cause revenues to change. In the following sections I will identify, on a class-specific basis, the key variables that affect revenues. In addition, I will provide my analysis of those key variables, my projection of that variable into the forward-looking test period, and my calculation of expected revenues from that tariff class.

A. COMMONWEALTH WASTEWATER

Q. WHAT ARE THE KEY VARIABLES AFFECTING REVENUES FROM THE COMMONWEALTH WASTEWATER TARIFF?

A. As mentioned previously, the Commonwealth Wastewater tariff includes only a monthly flat charge per customer. Therefore, the only variable affecting revenues is the expected number of customers billed. Given this, I conducted an analysis of the

1 historical number of wastewater customers billed in the Commonwealth Wastewater
2 system to determine whether billed customer change was expected. As stated above,
3 no organic growth was discovered. Thus, the same methodology that was used to
4 project estimated revenues for the base year was also used for the forward-looking
5 test period. Specifically, I used the same billed customer count from the same month
6 for the prior year. Once the expected level of billed customers for the forward-
7 looking period is determined, I multiplied the customer count by the Commonwealth
8 Wastewater current rate of \$34.92 to calculate each month's revenues. Annual
9 revenues were then determined by summing monthly revenues for the twelve
10 months.

11
12
13 B. MAGRUDER VILLAGE

14
15 **Q. WHAT ARE THE KEY VARIABLES AFFECTING REVENUES FROM THE**
16 **MAGRUDER VILLAGE CLASS?**

17 A. As with Commonwealth Wastewater revenues, the only variable affecting Magruder
18 Village revenues is the number of billed customers. As such, a historical analysis
19 was conducted to calculate the expected number of billed customers for the forward-
20 looking test period. As stated above, no organic customer growth was discovered in
21 Magruder Village. Thus, the same methodology that was used to project estimated
22 revenues for the latter portion of the base period was also used for the forward-
23 looking test period. Specifically, I used the same Magruder Village billed customer
24 count from the same month for the prior year. The expected number of monthly
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

billed customers was then multiplied by the Magruder Village monthly rate of \$35.00 to calculate each month’s total revenues. Annual Magruder Village revenues were then determined by adding monthly revenues for the twelve months.

C. YUNG FARM ESTATES

Q. WHAT ARE THE KEY VARIABLES AFFECTING REVENUES FROM THE YUNG FARM ESTATES CLASS?

A. Like Commonwealth Wastewater and Magruder Village, the Yung Farm Estates rate is a flat amount per month (\$60.00). Therefore, the only relevant variable is the number of billed customers. And as stated above, no organic customer growth was discovered in Yung Farm Estates. Thus, the same methodology that was used to project estimated revenues for the latter portion of the base period was also used for the forward-looking test period. Specifically, I used the same Yung Farm billed customer count from the same month for the prior year. This expected number of customers was then multiplied by the Yung Farm monthly rate of \$60.00 to determine total monthly revenues. Monthly revenues were then added for the twelve months to calculate Yung Farm annual revenues.

D. DELAPLAIN NON-RESIDENTIAL SERVICE

Q. WHAT ARE THE KEY VARIABLES AFFECTING REVENUES FROM THE DELAPLAIN NON-RESIDENTIAL SERVICE CLASS?

A. As explained previously, the Delaplain non-residential (commercial or industrial) rate includes both flat rate and usage components. Therefore, monthly revenues

1 derived from these billed customers are dependent on both the number of Delaplain
2 non-residential billed customers and the usage of those billed customers.

3
4 To determine the projected level of monthly wastewater revenues from
5 Delaplain non-residential customers, I conducted a historical analysis of both the
6 number of non-residential Delaplain customers as well as the monthly usage of those
7 customers. The analysis concluded that there was no organic growth in Delaplain
8 non-residential customers. Therefore, as previously described, the billed customer
9 count for the prior same month was used for my projections. For the usage
10 component of the Delaplain non-residential rate, a 3-year historical average for the
11 same month was calculated. The customer count and usage variables were then
12 multiplied by the applicable rate in the current tariff to determine total monthly
13 revenues. Monthly revenues were then added to calculate expected annual revenues
14 for the forward-looking test period.

15
16
17 E. CONSOLIDATED TARIFF SINGLE RESIDENTIAL

18
19 **Q. WHAT ARE THE KEY VARIABLES AFFECTING REVENUES FROM THE**
20 **CONSOLIDATED TARIFF SINGLE RESIDENTIAL CLASS?**

21 A. The consolidated single residential rate class is the primary driver of the Company's
22 wastewater revenues. The consolidated tariff includes a flat monthly rate of \$77.77
23 per dwelling unit with no usage component. Therefore, the only variable affecting
24 revenues from single residential customers is the number of billed dwelling units.

25
26

1 Much like the projection for other systems, I conducted a historical analysis
2 of the number of billed dwelling units by month. The analysis showed no organic
3 growth in the single residential class, so the billed dwelling unit count for same
4 month prior was used for the forward-looking test period. This number was then
5 multiplied by \$77.77 to derive total expected monthly revenues and the twelve
6 monthly totals were then added to calculate annual revenues for the forward-looking
7 test period.
8

9
10 F. CONSOLIDATED TARIFF MULTI-RESIDENTIAL

11 **Q. WHAT ARE THE KEY VARIABLES AFFECTING REVENUES FROM THE**
12 **CONSOLIDATED TARIFF MULTI-RESIDENTIAL CLASS?**

13
14 A. As with the single residential class from the same consolidated tariff, multi-
15 residential revenues are entirely dependent on the number of multi-residential
16 dwelling units. Therefore, I conducted a historical analysis of the number of billed
17 multi-residential dwelling units and multiplied each monthly count by the flat
18 monthly rate of \$58.33. The twelve monthly totals were then summed to calculated
19 annual revenues for the forward-looking test period.
20

21 **Q. PLEASE PROVIDE YOUR ANALYSIS OF HISTORICAL CUSTOMER**
22 **DATA FOR THE CONSOLIDATED TARIFF MULTI-RESIDENTIAL**
23 **CLASS AS WELL AS YOUR EXPECTATION FOR CUSTOMER COUNT**
24 **AND REVENUES FOR THE FORWARD-LOOKING TEST PERIOD.**
25
26

1 A. As previously discussed, the billed customer counts have not changed therefore the
2 revenues are not expected to change from historical revenues under current rates.

3
4 G. CONSOLIDATED TARIFF COMMERCIAL

5 **Q. WHAT ARE THE KEY VARIABLES AFFECTING REVENUES FROM THE**
6 **CONSOLIDATED TARIFF COMMERCIAL CLASS?**

7 A. As with the single and multi-residential classes from the same consolidated tariff,
8 commercial revenues are entirely dependent on the number of billed commercial
9 connections. Therefore, I conducted a historical analysis of the number of billed
10 commercial customers and multiplied each month's count by the flat monthly rate of
11 \$197.43. The twelve monthly totals were then added to calculate expected annual
12 revenues for the forward-looking test period.

13
14
15 **Q. PLEASE PROVIDE YOUR ANALYSIS OF HISTORICAL CUSTOMER**
16 **DATA FOR THE CONSOLIDATED TARIFF COMMERCIAL CLASS AS**
17 **WELL AS YOUR EXPECTATION FOR CUSTOMER COUNT AND**
18 **REVENUES FOR THE FORWARD-LOOKING TEST PERIOD.**

19
20 A. As previously discussed, the billed customer counts have not changed therefore the
21 revenues are not expected to change from historical revenues under the current rates.

22 **Q. WHAT ARE YOUR TOTAL WASTEWATER REVENUES FOR THE**
23 **FORWARD-LOOKING TEST PERIOD?**

24
25 A. The total forward-looking test period wastewater revenues derived from each of the
26 revenue classes I just described are as follows:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CLASS	PROJECTED REVENUES
Commonwealth Wastewater	\$5,448
Magruder Village	\$6,720
Yung Farm Estates	\$14,400
Delaplain Non-Residential	\$508,751
Consolidated Single Residential	\$2,092,329
Consolidated multi-residential	\$67,902
Consolidated Commercial	\$2,369
TOTAL	\$2,697,919

III. WATER REVENUES

1. WATER TARIFF DESCRIPTION

Q. PLEASE DESCRIBE THE COMPANY’S CURRENT WATER TARIFFS.

A. The Company has a single water tariff with rates that were established in the Company’s initial rate case (Case No. 2020-00290). That tariff is applicable to all the water customers acquired from the Center Ridge Water District, which are the only water customers the Company serves. The tariff includes a flat rate of \$77.63/month applicable to all customers.

2. BASE PERIOD WATER REVENUES

Q. PLEASE PROVIDE THE ACTUAL WATER REVENUES FOR THE PERIOD OF APRIL 2025 – SEPTEMBER 2025.

A. Actual water revenue for the period of April 2025 – September 2025 is \$131,543.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Q. PLEASE EXPLAIN HOW YOU PROJECTED WATER REVENUES FOR THE SIX MONTHS OF ESTIMATED DATA IN THE BASE PERIOD.

A. The same methodology used for wastewater revenue was also used to calculate water revenues. Specifically, an analysis of historical customer count data from 2022 to the current period was performed. The analysis concluded that, like wastewater operations, water operations also did not experience organic growth. Thus, the monthly billed customer forecast relied upon the same historical billed customer count from the prior same month. The monthly billed customer counts were then multiplied by the tariff rate to calculate total monthly revenues. Annual water revenues for the forward-looking test period were derived by adding the monthly revenues.

Q. PLEASE PROVIDE THE TOTAL WATER REVENUES FOR THE BASE PERIOD.

A. Total water revenue for the base year is \$261,792.

3. FORWARD-LOOKING WATER REVENUES

Q. HOW DID YOU FORECAST WATER REVENUES FOR THE FORWARD-LOOKING TEST PERIOD.

A. As with wastewater revenues, any projection of water revenues must focus on the variables that will cause revenues to change. Given that water revenues are entirely dependent on the number of billed customers, I conducted a historical analysis of the

1 number of billed water customers by month and multiplied each month count by the
2 flat monthly rate of \$77.63. The monthly amounts were then added to calculate
3 expected annual revenues for the forward-looking test period.
4

5 **Q. PLEASE PROVIDE YOUR ANALYSIS OF HISTORICAL CUSTOMER**
6 **DATA AND USAGE FOR THE WATER TARIFF AS WELL AS YOUR**
7 **EXPECTATION FOR CUSTOMER COUNT AND REVENUES FOR THE**
8 **FORWARD-LOOKING TEST PERIOD.**
9

10 A. As previously discussed, the billed customer counts have not changed. As such,
11 revenues for the forward-looking test period are not expected to change from
12 historical revenues under current rates.
13

14 **IV. OTHER REVENUES**

15 **Q. DOES THE COMPANY COLLECT FROM ANY OTHER SOURCES?**

16 A. Yes. In addition to the various tariffed rates for service, the Company can also
17 collect from non-recurring tariffed charges including various connection charges,
18 late fees, and returned checks.
19

20 **Q. PLEASE EXPLAIN THE PROJECTION OF WATER NON-RECURRING**
21 **CHARGES.**
22

23 A. For the water tariff, the only non-recurring charge is a new service connection charge
24 of \$350.00. The Company has not projected any revenues associated with this
25 charge for the forward-looking test period for two reasons. First, as mentioned,
26

1 given its historical analysis, the Company does not project any growth or additional
2 water connections. Therefore, it does not forecast any new service connection
3 charges. Second, if there is a new water service connection, it does not affect net
4 income, and therefore would not affect the revenue deficiency in a rate case, as the
5 Company records the new connection fees as Contributions in Aid of Construction
6 (“CIAC”) to offset the construction cost to establish the new connection.
7

8
9 **Q. PLEASE EXPLAIN ANY PROJECTION OF WASTEWATER REVENUES**
10 **ASSOCIATED WITH THE ADDITION OF NEW CUSTOMERS IN THE**
11 **CONSOLIDATED TARIFF.**

12 A. The consolidated wastewater tariff includes a new tap fee which is based on the
13 “actual cost” of the new connection. Similarly, the Delaplain non-residential rate
14 sheet, has a new tap fee at “actual cost.” The Company has not included a projection
15 of such non-recurring revenues as it has not experienced historical customer growth
16 and, therefore, does not project new wastewater connections in the forward-looking
17 test period. Moreover, as before, such non-recurring revenues would also not affect
18 net income as the new connection fee is recorded in CIAC to offset the construction
19 cost to establish the new connection.
20
21

22 **Q. DOES THE COMMONWEALTH WASTEWATER TARIFF INCLUDE ANY**
23 **OTHER NON-RECURRING FEES?**
24

25 A. Yes, the Commonwealth Wastewater tariff includes both a \$25.00 disconnection fee
26 and a \$25.00 reconnection fee.

1 **Q. HAS THE COMPANY PROJECTED ANY REVENUES FOR THE**
2 **FORWARD-LOOKING TEST PERIOD ASSOCIATED WITH THE**
3 **COMMONWEALTH WASTEWATER DISCONNECTION AND**
4 **RECONNECTION FEES?**

5
6 A. No. As Mr. Aaron Silas indicates, the Company is proposing to eliminate the
7 Commonwealth Wastewater tariff and serve the Commonwealth Wastewater
8 customers through the terms, conditions, and non-recurring charges in the
9 consolidated tariff. Since the consolidated tariff does not include
10 disconnection/reconnection fees, the Company does not project collecting revenues
11 associated with such fees.
12

13
14 **Q. DID YOU FORECAST ANY REVENUES FOR THE FORWARD-LOOKING**
15 **TEST PERIOD ASSOCIATED WITH THE RETURNED CHECK FEE?**

16 A. No. Much like the charge for actual cost tap fees, the returned check fee does not
17 affect net income and, therefore, does not affect the revenue deficiency in this case.
18 Specifically, the returned check fee is designed to offset the incurrence of a bank fee
19 charged to the Company when a customer's check is returned. For this reason, as
20 the Commission pointed out, the returned check fee is "cost justified."³ Any
21 quantification of a revenue deficiency, whether for a historical or a forward-looking
22 time period, would necessarily have to include both the revenue and the offsetting
23
24
25

26 ³ Order, Case No. 2022-00432, issued February 14, 2024, at page 97.

1 cost. For this reason, a cost justified returned check fee should not affect the revenue
2 deficiency.

3
4 **Q. HOW DID YOU FORECAST THE LATE PAYMENT PENALTY FOR THE**
5 **FORWARD-LOOKING TEST PERIOD FOR WASTEWATER.**

6 A. I conducted an historical analysis of late payment penalty revenue collected from
7 wastewater customers. My analysis concluded that the Company charged 1.93% of
8 wastewater revenues in late payment penalties. The Company has no reason to
9 believe that the frequency of customers incurring a late payment penalty will change
10 in the forward-looking test period. Therefore, the 1.93% late payment frequency
11 rate was applied to the forecasted monthly consolidated wastewater revenues to
12 calculate the late payment penalties expected in the forward-looking test period.

13
14
15 **Q. IS THE COMPANY REQUESTING ADDITIONAL FEES FOR WATER.**

16 A. Yes, as discussed in the testimonies of Mr. Thies and Mr. Silas, the Company is
17 requesting a late payment penalty and a returned check fee for the water customers.

18
19 **Q. HOW DID YOU FORECAST THE LATE PAYMENT PENALTY FOR THE**
20 **FORWARD-LOOKING TEST PERIOD FOR WATER.**

21 A. There are no water late penalty fees in the base period as it is not yet approved. To
22 calculate the expected water late fees, I conducted a historical analysis of water
23 customers to determine the extent to which customers paid their bills by the due date
24 (last day of month). I calculated the number of customers and revenue associated
25 with those customers who paid after their due date. I then applied the requested 10%
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

penalty to calculate an annual level of water late payment fees of \$5,023. This late payment penalty is then included as revenues in the forward-looking test period and used to offset a portion of the water revenue deficiency.

V. CONCLUSION

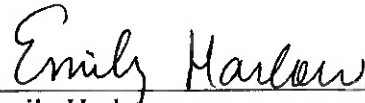
Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.

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

VERIFICATION

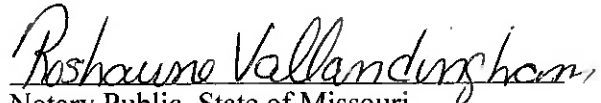
I, Emily M. Harlow, Manager of Rates and Revenue, verify, state, and affirm that I prepared or supervised the preparation of the Direct Testimony filed with this Verification, and that Direct Testimony is true and accurate to the best of my knowledge, information, and belief after a reasonable inquiry on this 8th day of December, 2025.



Emily Harlow
Manager of Rates and Revenue

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS)

SUBSCRIBED AND SWORN TO before me on this 8th day of December, 2025.



Notary Public, State of Missouri

My Commission expires: 04-10-2027

KY - Bluegrass Revenue Forecast
2025-00354

807 KAR 5:001 Section 16 (7)(h)13
807 KAR 5:001 Section 16 (7)(h)14

807 KAR 5:001 Section 16 (8)(i)
807 KAR 5:001 Section 16 (8)(m)

8/1/2021

KY-Bluegrass Res Water

\$77.63

Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 21,345	\$ 21,108	\$ 21,259	\$ 21,659	\$ 21,485	\$ 21,838	\$ 22,054	\$ 22,282	\$ 22,225	\$ 22,092	\$ 22,257	\$ 21,773	\$ 261,377
2028	\$ 21,345	\$ 21,108	\$ 21,259	\$ 21,659	\$ 21,485	\$ 21,838	\$ 22,054	\$ 22,282	\$ 22,225	\$ 22,092	\$ 22,257	\$ 21,773	\$ 261,377
2027	\$ 21,345	\$ 21,108	\$ 21,259	\$ 21,659	\$ 21,485	\$ 21,838	\$ 22,054	\$ 22,282	\$ 22,225	\$ 22,092	\$ 22,257	\$ 21,773	\$ 261,377
2026	\$ 21,345	\$ 21,108	\$ 21,259	\$ 21,659	\$ 21,485	\$ 21,838	\$ 22,054	\$ 22,282	\$ 22,225	\$ 22,092	\$ 22,257	\$ 21,773	\$ 261,377
2025	\$ 21,345	\$ 21,108	\$ 21,259	\$ 21,659	\$ 21,485	\$ 21,838	\$ 22,054	\$ 22,282	\$ 22,225	\$ 22,092	\$ 22,257	\$ 21,773	\$ 261,377
2024	\$ 21,141	\$ 21,025	\$ 21,217	\$ 21,177	\$ 21,640	\$ 21,995	\$ 22,169	\$ 22,339	\$ 22,316	\$ 22,226	\$ 22,257	\$ 21,773	\$ 261,275
2023	\$ 21,682	\$ 21,677	\$ 21,371	\$ 21,604	\$ 21,602	\$ 21,959	\$ 22,168	\$ 22,171	\$ 22,554	\$ 21,797	\$ 21,757	\$ 21,301	\$ 261,643
2022	\$ 25,294	\$ 25,140	\$ 24,522	\$ 23,491	\$ 23,434	\$ 23,209	\$ 67,475	\$ 23,232	\$ 22,872	\$ 23,222	\$ 22,363	\$ 22,573	\$ 326,826

12/31/2023 8/1/2021

KY-Bluegrass Res Sewer

\$77.77 See Bluegrass Consolidated Tab

Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 174,472	\$ 174,623	\$ 174,796	\$ 174,850	\$ 174,381	\$ 174,770	\$ 174,326	\$ 173,955	\$ 173,684	\$ 173,430	\$ 174,537	\$ 174,507	\$ 2,092,329
2028	\$ 174,472	\$ 174,623	\$ 174,796	\$ 174,850	\$ 174,381	\$ 174,770	\$ 174,326	\$ 173,955	\$ 173,684	\$ 173,430	\$ 174,537	\$ 174,507	\$ 2,092,329
2027	\$ 174,472	\$ 174,623	\$ 174,796	\$ 174,850	\$ 174,381	\$ 174,770	\$ 174,326	\$ 173,955	\$ 173,684	\$ 173,430	\$ 174,537	\$ 174,507	\$ 2,092,329
2026	\$ 174,472	\$ 174,623	\$ 174,796	\$ 174,850	\$ 174,381	\$ 174,770	\$ 174,326	\$ 173,955	\$ 173,684	\$ 173,430	\$ 174,537	\$ 174,507	\$ 2,092,329
2025	\$ 174,472	\$ 174,623	\$ 174,796	\$ 174,850	\$ 174,381	\$ 174,770	\$ 174,326	\$ 173,955	\$ 173,684	\$ 173,430	\$ 174,537	\$ 174,507	\$ 2,092,329
2024	\$ 205,636	\$ 205,695	\$ 174,947	\$ 174,975	\$ 174,711	\$ 174,689	\$ 174,969	\$ 174,456	\$ 174,778	\$ 174,569	\$ 174,537	\$ 174,507	\$ 2,158,468
2023	\$ 161,502	\$ 161,194	\$ 161,533	\$ 160,502	\$ 161,013	\$ 164,171	\$ 156,900	\$ 156,565	\$ 156,843	\$ 156,732	\$ 156,557	\$ 156,661	\$ 1,910,172
2022	\$ 160,324	\$ 160,742	\$ 160,589	\$ 160,655	\$ 166,790	\$ 165,520	\$ 166,945	\$ 162,888	\$ 161,513	\$ 162,285	\$ 161,309	\$ 161,645	\$ 1,951,206

KY-Bluegrass Multi Sewer

\$58.33 64.48

Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,845	\$ 5,477	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 67,902
2028	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,845	\$ 5,477	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 67,902
2027	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,845	\$ 5,477	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 67,902
2026	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,845	\$ 5,477	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 67,902
2025	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,845	\$ 5,477	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 67,902
2024	\$ 6,658	\$ 6,658	\$ 5,658	\$ 5,899	\$ 5,336	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 5,658	\$ 69,815
2023	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,306	\$ 6,210	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,255	\$ 75,062
2022	\$ 3,804	\$ 3,804	\$ 3,804	\$ 3,804	\$ 3,804	\$ 3,804	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,255	\$ 6,255	\$ 60,353

KY-Commonwealth Sewer

\$34.92

Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 5,448
2028	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 5,448
2027	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 5,448
2026	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 5,448
2025	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 5,448
2024	\$ -	\$ 419	\$ 428	\$ 411	\$ 419	\$ 419	\$ 437	\$ 454	\$ 454	\$ 454	\$ 454	\$ 454	\$ 4,803
2023	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2022	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

KY-Magruder Village Sewer

\$35.00

Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 6,720
2028	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 6,720
2027	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 6,720
2026	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 6,720
2025	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 6,720
2024	\$ -	\$ -	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 560	\$ 5,600
2023	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2022	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

KY-Yung Farm Estates Sewer

\$60.00

Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 14,400
2028	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 14,400
2027	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 14,400
2026	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 14,400
2025	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 14,400
2024	\$ -	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ 13,200
2023	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2022	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

KY - Bluegrass Revenue Forecast

2025-00354

807 KAR 5:001 Section 16 (7)(h)13

807 KAR 5:001 Section 16 (7)(h)14

807 KAR 5:001 Section 16 (8)(i)

807 KAR 5:001 Section 16 (8)(m)

KY-Bluegrass Com Sewer

\$197.43

\$214.93 (Old Persimmon Ridge)

Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	2,369
2028 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	2,369
2027 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	2,369
2026 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	2,369
2025 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	2,369
2024 \$	229 \$	229 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	197 \$	2,432
2023 \$	215 \$	215 \$	215 \$	215 \$	215 \$	215 \$	215 \$	215 \$	215 \$	215 \$	215 \$	215 \$	2,579
2022 \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	215 \$	215 \$	215 \$	215 \$	215 \$	1,290

KY - Bluegrass Revenue Forecast
2025-00354

807 KAR 5:001 Section 16 (7)(h)13 807 KAR 5:001 Section 16 (8)(i)
807 KAR 5:001 Section 16 (7)(h)14 807 KAR 5:001 Section 16 (8)(m)

KY-Bluegrass Res Water

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	275	272	274	279	277	281	284	287	286	285	287	280	3,367	280	-
2028	275	272	274	279	277	281	284	287	286	285	287	280	3,367	280	-
2027	275	272	274	279	277	281	284	287	286	285	287	280	3,367	280	-
2026	275	272	274	279	277	281	284	287	286	285	287	280	3,367	280	-
2025	275	272	274	279	277	281	284	287	286	285	287	280	3,367	280	(0)
2024	272	271	273	273	279	283	286	288	287	286	287	280	3,366	280	(0)
2023	279	279	275	278	278	283	286	286	291	281	280	274	3,370	281	(109)
2022	326	324	316	303	302	299	869	299	295	299	288	291	4,210	390	

KY-Bluegrass Res Sewer

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	2,243	2,245	2,248	2,248	2,242	2,247	2,242	2,237	2,233	2,230	2,244	2,244	26,904	2,242	-
2028	2,243	2,245	2,248	2,248	2,242	2,247	2,242	2,237	2,233	2,230	2,244	2,244	26,904	2,242	-
2027	2,243	2,245	2,248	2,248	2,242	2,247	2,242	2,237	2,233	2,230	2,244	2,244	26,904	2,242	-
2026	2,243	2,245	2,248	2,248	2,242	2,247	2,242	2,237	2,233	2,230	2,244	2,244	26,904	2,242	-
2025	2,243	2,245	2,248	2,248	2,242	2,247	2,242	2,237	2,233	2,230	2,244	2,244	26,904	2,242	(71)
2024	2,644	2,645	2,250	2,250	2,247	2,246	2,250	2,243	2,247	2,245	2,244	2,244	27,755	2,313	(138)
2023	2,481	2,476	2,482	2,468	2,476	2,515	2,421	2,418	2,421	2,418	2,417	2,419	29,414	2,451	(47)
2022	2,117	2,122	2,120	2,121	2,249	2,232	2,553	2,498	2,481	2,495	2,479	2,483	27,950	2,498	

KY-Bluegrass Multi Sewer

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	97	97	97	97	97	100	94	97	97	97	97	97	1,164	97	-
2028	97	97	97	97	97	100	94	97	97	97	97	97	1,164	97	-
2027	97	97	97	97	97	100	94	97	97	97	97	97	1,164	97	-
2026	97	97	97	97	97	100	94	97	97	97	97	97	1,164	97	-
2025	97	97	97	97	97	100	94	97	97	97	97	97	1,164	97	(3)
2024	114	114	97	101	91	97	97	97	97	97	97	97	1,197	100	3
2023	97	97	97	98	96	97	97	97	97	97	97	97	1,164	97	0
2022	59	59	59	59	59	59	97	97	97	97	97	97	936	97	

KY-Commonwealth Sewer

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	13	13	13	13	13	13	13	13	13	13	13	13	156	13	-
2028	13	13	13	13	13	13	13	13	13	13	13	13	156	13	-
2027	13	13	13	13	13	13	13	13	13	13	13	13	156	13	-
2026	13	13	13	13	13	13	13	13	13	13	13	13	156	13	-
2025	13	13	13	13	13	13	13	13	13	13	13	13	156	13	0
2024	-	12	12	12	12	12	13	13	13	13	13	13	138	13	13
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

KY-Magruder Village Sewer

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	16	16	16	16	16	16	16	16	16	16	16	16	192	16	-
2028	16	16	16	16	16	16	16	16	16	16	16	16	192	16	-
2027	16	16	16	16	16	16	16	16	16	16	16	16	192	16	-
2026	16	16	16	16	16	16	16	16	16	16	16	16	192	16	-
2025	16	16	16	16	16	16	16	16	16	16	16	16	192	16	-
2024	-	-	16	16	16	16	16	16	16	16	16	16	160	16	16
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

KY-Yung Farm Estates Sewer

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	20	20	20	20	20	20	20	20	20	20	20	20	240	20	-
2028	20	20	20	20	20	20	20	20	20	20	20	20	240	20	-
2027	20	20	20	20	20	20	20	20	20	20	20	20	240	20	-
2026	20	20	20	20	20	20	20	20	20	20	20	20	240	20	-
2025	20	20	20	20	20	20	20	20	20	20	20	20	240	20	-
2024	-	20	20	20	20	20	20	20	20	20	20	20	220	20	20
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

KY - Bluegrass Revenue Forecast

807 KAR 5:001 Section 16 (7)(h)13 807 KAR 5:001 Section 16 (8)(i)

2025-00354

807 KAR 5:001 Section 16 (7)(h)14 807 KAR 5:001 Section 16 (8)(m)

KY-Bluegrass Com Sewer

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2028	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2027	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2026	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2025	1	1	1	1	1	1	1	1	1	1	1	1	12	1	(0)
2024	1	1	1	1	1	1	1	1	1	1	1	1	12	1	0
2023	1	1	1	1	1	1	1	1	1	1	1	1	12	1	-
2022	-	-	-	-	-	-	1	1	1	1	1	1	6	1	

KY-Delaplain Com Sewer
2025-00354

807 KAR 5:001 Section 16 (7)(h)13
807 KAR 5:001 Section 16 (7)(h)14

807 KAR 5:001 Section 16 (8)(i)
807 KAR 5:001 Section 16 (8)(m)

Usage (gallons)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	2,984,440	3,077,908	2,792,405	2,645,330	2,928,212	3,106,282	2,945,629	3,073,744	2,886,723	3,914,136	3,038,469	3,096,063	36,489,340
2028	2,984,440	3,077,908	2,792,405	2,645,330	2,928,212	3,106,282	2,945,629	3,073,744	2,886,723	3,914,136	3,038,469	3,096,063	36,489,340
2027	2,984,440	3,077,908	2,792,405	2,645,330	2,928,212	3,106,282	2,945,629	3,073,744	2,886,723	3,914,136	3,038,469	3,096,063	36,489,340
2026	2,984,440	3,077,908	2,792,405	2,645,330	2,928,212	3,106,282	2,945,629	3,073,744	2,886,723	3,914,136	3,038,469	3,096,063	36,489,340
2025	2,939,548	3,255,356	3,185,636	2,859,600	2,970,888	3,216,872	3,366,688	3,284,024	2,497,440	5,418,808	3,038,469	3,096,063	39,129,392
2024	3,187,684	2,723,044	2,471,192	2,515,056	2,982,324	3,509,328	3,109,976	3,010,152	3,267,236	3,056,900	2,953,876	3,639,872	36,426,640
2023	2,826,087	3,255,324	2,720,386	2,561,335	2,831,423	2,592,645	2,360,224	2,927,056	2,895,492	3,266,700	2,964,728	2,840,832	34,042,232
2022	4,179,407	4,179,407	3,460,900	4,009,697	3,663,157	2,745,514	3,419,115	3,971,221	3,434,339	3,847,034	3,196,804	2,807,485	42,914,081

Total Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 41,738	\$ 42,829	\$ 39,497	\$ 37,781	\$ 41,082	\$ 43,160	\$ 41,286	\$ 42,781	\$ 40,598	\$ 52,588	\$ 42,369	\$ 43,041	\$ 508,751
2028	\$ 41,738	\$ 42,829	\$ 39,497	\$ 37,781	\$ 41,082	\$ 43,160	\$ 41,286	\$ 42,781	\$ 40,598	\$ 52,588	\$ 42,369	\$ 43,041	\$ 508,751
2027	\$ 41,738	\$ 42,829	\$ 39,497	\$ 37,781	\$ 41,082	\$ 43,160	\$ 41,286	\$ 42,781	\$ 40,598	\$ 52,588	\$ 42,369	\$ 43,041	\$ 508,751
2026	\$ 41,738	\$ 42,829	\$ 39,497	\$ 37,781	\$ 41,082	\$ 43,160	\$ 41,286	\$ 42,781	\$ 40,598	\$ 52,588	\$ 42,369	\$ 43,041	\$ 508,751
2025	\$ 41,215	\$ 44,900	\$ 44,086	\$ 40,282	\$ 41,580	\$ 44,451	\$ 46,199	\$ 45,235	\$ 36,055	\$ 70,740	\$ 42,369	\$ 43,041	\$ 540,153
2024	\$ 50,856	\$ 44,486	\$ 35,890	\$ 36,261	\$ 41,714	\$ 47,864	\$ 43,203	\$ 42,039	\$ 45,045	\$ 42,584	\$ 41,382	\$ 49,387	\$ 520,711
2023	\$ 25,124	\$ 28,940	\$ 24,184	\$ 22,770	\$ 25,171	\$ 23,049	\$ 20,982	\$ 26,022	\$ 25,741	\$ 29,041	\$ 26,356	\$ 25,255	\$ 302,636
2022	\$ 37,155	\$ 37,155	\$ 30,767	\$ 35,646	\$ 32,565	\$ 24,408	\$ 30,396	\$ 35,304	\$ 30,531	\$ 38,848	\$ 28,420	\$ 24,959	\$ 386,154

Usage Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 34,828	\$ 35,919	\$ 32,587	\$ 30,871	\$ 34,172	\$ 36,250	\$ 34,375	\$ 35,871	\$ 33,688	\$ 45,678	\$ 35,459	\$ 36,131	\$ 425,831
2028	\$ 34,828	\$ 35,919	\$ 32,587	\$ 30,871	\$ 34,172	\$ 36,250	\$ 34,375	\$ 35,871	\$ 33,688	\$ 45,678	\$ 35,459	\$ 36,131	\$ 425,831
2027	\$ 34,828	\$ 35,919	\$ 32,587	\$ 30,871	\$ 34,172	\$ 36,250	\$ 34,375	\$ 35,871	\$ 33,688	\$ 45,678	\$ 35,459	\$ 36,131	\$ 425,831
2026	\$ 34,828	\$ 35,919	\$ 32,587	\$ 30,871	\$ 34,172	\$ 36,250	\$ 34,375	\$ 35,871	\$ 33,688	\$ 45,678	\$ 35,459	\$ 36,131	\$ 425,831
2025	\$ 34,305	\$ 37,990	\$ 37,176	\$ 33,372	\$ 34,670	\$ 37,541	\$ 39,289	\$ 38,325	\$ 29,145	\$ 63,237	\$ 35,459	\$ 36,131	\$ 456,640
2024	\$ 37,200	\$ 31,778	\$ 28,839	\$ 29,351	\$ 34,804	\$ 40,954	\$ 36,293	\$ 35,128	\$ 38,129	\$ 35,674	\$ 34,472	\$ 42,477	\$ 425,099
2023	\$ 25,124	\$ 28,940	\$ 24,184	\$ 22,770	\$ 25,171	\$ 23,049	\$ 20,982	\$ 26,022	\$ 25,741	\$ 29,041	\$ 26,356	\$ 25,255	\$ 302,636
2022	\$ 37,155	\$ 37,155	\$ 30,767	\$ 35,646	\$ 32,565	\$ 24,408	\$ 30,396	\$ 35,304	\$ 30,531	\$ 38,848	\$ 28,420	\$ 24,959	\$ 386,154

Fixed Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2029	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 82,921
2028	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 82,921
2027	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 82,921
2026	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 82,921
2025	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 7,502	\$ 6,910	\$ 6,910	\$ 83,513
2024	\$ 13,656	\$ 12,708	\$ 7,051	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,910	\$ 6,917	\$ 6,910	\$ 6,910	\$ 6,910	\$ 95,612
2023	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2022	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Billing Determinates

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Monthly Average	Growth
2029	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-
2028	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-
2027	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-
2026	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-
2025	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-
2024	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-
2023	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-
2022	35	35	35	35	35	35	35	35	35	35	35	35	420	35	-

KY - Bluegrass Late Fees Sewer
2025-00354

Sum of Penalties Row Labels	Column Labels												Grand Total
	20241	20242	20243	20244	20245	20246	20247	20248	20249	202410	202411	202412	
KY-Bluegrass Multi Sewer - Penalty				\$ 169	\$ 93	\$ 153	\$ 93	\$ 93	\$ 105	\$ 262	\$ 105	\$ 105	\$ 1,179
KY-Bluegrass Res Sewer - Penalty				\$ 4,105	\$ 4,206	\$ 4,462	\$ 4,224	\$ 4,274	\$ 4,142	\$ 4,462	\$ 4,085	\$ 4,243	\$ 38,202
KY-Commonwealth Sewer - Penalty			\$ 5	\$ 4	\$ 5	\$ 2	\$ 2	\$ 4	\$ 2	\$ 4	\$ 4	\$ 5	\$ 35
KY-Darlington Creek Sewer - Penalty	\$ 130	\$ -	\$ -	\$ -		\$ -				\$ -			\$ 130
KY-Delaplain Com Sewer - Penalty				\$ 421	\$ 798	\$ 1,228	\$ 659	\$ 574	\$ 343	\$ 612	\$ 397	\$ 553	\$ 5,586
KY-Herrington Haven Sewer - Penalty	\$ 367	\$ 353	\$ 348	\$ 341	\$ 341			\$ -					\$ 1,749
KY-Springcrest Sewer - Penalty	\$ 23	\$ 8		\$ -									\$ 32
Grand Total	\$ 521	\$ 361	\$ 353	\$ 5,040	\$ 5,442	\$ 5,846	\$ 4,978	\$ 4,946	\$ 4,592	\$ 5,339	\$ 4,591	\$ 4,906	\$ 46,914

2023 Rev Req Late fees	\$ 14,244		
		2024	2025 Forecast
Late Fees	\$ 46,914	\$ 58,786	
Fees reclassified to Liability	\$ 32,670	\$ 44,542	\$ 77,212

		2024	2025 Forecast
Total Sewer Rev	Revenue	\$ 2,765,670	\$ 2,702,753
	Authorized	\$ 2,905,451	\$ 2,905,451
	Shortfall	\$ (139,781)	\$ (202,698)

Sum of Penalties Row Labels	Column Labels											Grand Total
	20251	20252	20253	20254	20255	20256	20257	20258	20259	202510		
KY-Bluegrass Multi Sewer - Penalty	\$ 128	\$ 70	\$ 105	\$ 105	\$ 93	\$ 105	\$ 117	\$ 110	\$ 268	\$ 35	\$ 1,137	
KY-Bluegrass Res Sewer - Penalty	\$ 4,034	\$ 4,825	\$ 4,317	\$ 3,801	\$ 4,062	\$ 4,019	\$ 3,848	\$ 3,796	\$ 3,742	\$ 3,264	\$ 39,709	
KY-Commonwealth Sewer - Penalty	\$ 4	\$ 5	\$ 2	\$ 2	\$ 4	\$ 4	\$ 2	\$ 2	\$ 4	\$ 4	\$ 30	
KY-Darlington Creek Sewer - Penalty		\$ -							\$ -		\$ -	
KY-Delaplain Com Sewer - Penalty	\$ 817	\$ 1,008	\$ 2,323	\$ 1,103	\$ 527	\$ 424	\$ 673	\$ 462	\$ 607	\$ 470	\$ 8,414	
Grand Total	\$ 4,984	\$ 5,908	\$ 6,747	\$ 5,010	\$ 4,686	\$ 4,551	\$ 4,639	\$ 4,370	\$ 4,621	\$ 3,773	\$ 49,289	

\$ 2,278,728 Total Sewer Rev
2.16%

1.93% Average

Late Fee Liability	\$ 32,670	\$ 44,542
--------------------	-----------	-----------

KY-NSF Fee
Sewer Revenue

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2028	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2027	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2026	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2025	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2024	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2023	\$ -	\$ 52.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 52.50
2022	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 80.00	\$ (80.00)	\$ -	\$ -	\$ -