

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

<i>Electronic</i> APPLICATION OF KENTUCKY-	)	
AMERICAN WATER COMPANY FOR AN	)	
ADJUSTMENT OF RATES, APPROVAL OF	)	Case No. 2026-00094
SYSTEM IMPROVEMENT PROGRAM,	)	
AND TARIFF CHANGES	)	

**Georgetown Municipal Water and Sewer Service Response
to Staff's First Request for Information**

Georgetown Municipal Water and Sewer Service ("GMWSS") herewith submits its Response to the Commissions Staff's First Request for Information. Signed verifications for this Response appear on the following pages. Documents attached in response to a data request have been stamped with identifying numbers beginning with "01-____." The *2022 Water Supply Source Assessment* requested in 1 PSC 06 exceeds the filings limits and so is filed separately in five (5) parts.

Respectfully submitted,

/s/ Katherine K. Yunker

Katherine K. Yunker | yunker@mcbrayerfirm.com

Stephen G. Amato | samato@mcbrayerfirm.com

McBRAYER PLLC

201 East Main Street, Suite 900

Lexington, KY 40507

(859) 231-8780

ATTORNEYS FOR GMWSS

Georgetown Municipal Water and Sewer Service

Verification

I, Chase Azevedo, Manager of Georgetown Municipal Water and Sewer Service, state that I prepared or supervised the preparation of the responses to the Commission Staff's First Request for Information for which I am listed as the witness, and that the matters and things set forth in those responses are true and correct to the best of my knowledge, information, and belief formed after reasonable inquiry.



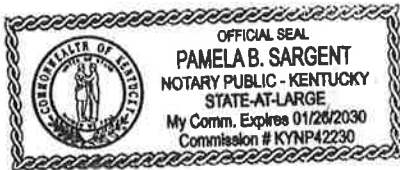
CHASE AZEVEDO

STATE OF KENTUCKY)

COUNTY OF Scott)

Subscribed, sworn to, and acknowledged this 10th day of September, 2026, before me, a Notary Public in and before said County and State.

My Commission Expires: 01-26-2030



NOTARY PUBLIC

{seal}

Georgetown Municipal Water and Sewer Service

Verification

I, Kent A. Chandler, Secretary of the Board of Commissioners of Georgetown Municipal Water and Sewer Service, state that I prepared or supervised the preparation of the responses to the Commission Staff's First Request for Information for which I am listed as the witness, and that the matters and things set forth in those responses are true and correct to the best of my knowledge, information and belief formed after reasonable inquiry.

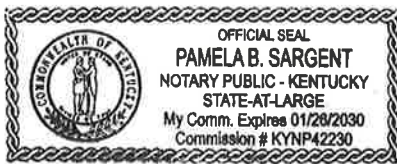

KENT A. CHANDLER

STATE OF KENTUCKY)

COUNTY OF Scott)

Subscribed, sworn to, and acknowledged this 9th day of September, 2026, before me, a Notary Public in and before said County and State.

My Commission Expires: 01-26-2030



{seal}


NOTARY PUBLIC

Request

1. Refer to the August 7, 2026 Direct Testimony of Chase Azevedo (Azevedo Direct Testimony), page 6, lines 12-19, where Mr. Azevedo states that Kentucky-American Water Company (Kentucky-American) classifies the account for Georgetown Water and Sewer's wastewater treatment plant at 900 Cherry Blossom Way as Sales for Resale even though the water delivered at that location is used on-site.
 - a. Confirm whether any water delivered to 900 Cherry Blossom Way is resold or distributed to retail customers. If not confirmed, explain the factual and tariff basis for Georgetown Water and Sewer's position that the account should be classified under Commercial Water Service rather than Sales for Resale.
 - b. Provide all invoices, account records, correspondence, and other documents concerning the account's classification and Georgetown Water and Sewer's request for correction.
 - c. State the current status of the request for correction and identify any refund, credit, or interest requested or received.
-

Response

- a. The 900 Cherry Blossom Way location is GMWSS's Sewer Treatment Plant No. 2; none of the water delivered to that location is resold or distributed to retail customers. The use is end-use, and it is the mis-classification of this account as Sales for Resale (wholesale) use that is pertinent to this case. Data about the relatively regular, small-volume usage at 900 Cherry Blossom Way was being seen by KAWC as wholesale usage and was potentially distorting both the perceived statistics and character of GMWSS's actual wholesale use.
- b. The request for correction of the 900 Cherry Blossom Way service classification was made in an 8/5/26 email from GMWSS counsel of record in this case to Kentucky American's counsel of record in this case. See 8/5/26 email attached as 01-0001; see also response to 1 PSC 01.c below.

GMWSS is not aware of any invoices, etc. concerning the account's classification per se; however, the invoices from KAWC for the 900 Cherry Blossom Way account from 8/22/25 through 7/20/26 show a KAWC classification as **Account Type: Sale for Resale** and usage charges at the corresponding rate. In contrast, the KAWC invoice for usage from 7/21/26 through 8/19/26 shows a KAWC classification as **Account Type: Other Public Authority** and usage charges at the corresponding rate. See invoice pages for 8/22/25–8/19/26 usage attached as 01-0014 to 01-0025.

Review of past KAWC invoices on this account shows there was a change in **Account Type** from Other Public Authority on the 1/25/23 invoice (for usage from 12/22/22 to 1/24/23) to Sale for Resale on the 2/24/23 invoice (for usage from 1/25/23 to 2/21/23). See invoice pages attached as 01-0026 to 01-0027.

- c. As reflected by the August 2026 invoice (attached as 01-0025), KAWC did immediately change the categorization of the account from Sale for Resale; but the change was to the Other Public Authority classification. GMWSS notes that it now realizes that its other accounts with KAWC (excepting the Champion Way interconnection) have been categorized and charged as Other Public Authority. KAWC has offered to meet with GMWSS to discuss all of our accounts. See 8/31/26 email with KAWC's *GMWSS Account Review 08282026* file, attached as 01-0002 to 01-0013. GMWSS appreciates KAWC's offer and intends to take KAWC up on it sometime in the future. We should be able to work out issues about these accounts' classification with KAWC, and do not ask the Commission to spend its time and other resources on getting involved at this point or in this case.

No refund, credit, or interest has been requested or received.

Subject: Correcting service categorization for service to GMWSS at 900 Cherry Blossom Way
Date: Wednesday, August 5, 2026 at 4:55:13 PM Eastern Daylight Time
From: Katie Yunker
To: Lindsey W. Ingram III, Monica H. Braun, Molly Loy
CC: Stephen Amato
BCC: Holly Lewis
Attachments: image001[36].png

(This is from and to party counsel because the issue has been the subject of filings in PSC Case No. 2026-00094.)

The dispute about the statistics for Georgetown Municipal’s wholesale purchases of KAWC water arising from the intervention request brought attention to KAWC’s (mis)categorization of service to the 900 Cherry Blossom Way location (account # 1012-210010314282) as Sales for Resale. The only account / service location for Georgetown Municipal’s purchase of KAWC water for resale to its customers is at the Champion Way interconnection (account # 1012-220040961440). As with the service for five (5) other Georgetown Municipal accounts with KAWC and the service to neighboring KAWC customers, Georgetown Municipal uses the water purchased at 900 Cherry Blossom Way for on-site, end-use consumption. Per KAWC’s tariff, the 900 Cherry Blossom Way account is commercial and should be categorized and charged as such.

Georgetown Municipal asks that this mis-categorization be corrected immediately. At the latest, the bill for service during the (approx.) period July 22 - August 21, 2026, should reflect commercial service at the 900 Cherry Blossom Way location. Please respond whether KAWC will make the correction as requested.

Katie Yunker (859) 231-8780 x1137
Direct Dial: 859-551-3661
Please leave a voicemail if you want me to call you back



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From: Andy A Lewis <William.Lewis@amwater.com>
Sent: Monday, August 21, 2026 8:47 AM
To: Chase Azevedo <CAzevedo@gmwss.com>
Subject: FW: GMWSS/KAW Accounts and Interconnections

Good morning Chase,

I would like to follow up with you regarding the missclacification of Georgetown Municipal Water & Sewer Service's water service account for 900 Cherry Blossom Way. Kentucky-American Water has appropriately reclassified this account as OPA. GMWSS is a valued customer of KAW, and as a result of our error, KAW performed a review of all active GMWSS accounts to ensure account classification accuracy. Per my email last week and a phone message I left with your office employee Ashely on August 27th, I believe it would be helpful for both GMWSS and KAW to meet and review these accounts together to ensure the account classifications are in fact accurate. During our review, a question regarding the intended use of the connection located at 1458 Burton Road arose, and we would like to review this account with GMWSS to ensure accuracy.

My goal is to ensure KAW is meeting the needs of GMWSS as a customer. Due to the number of accounts and the significance of the Champion Way interconnection, I believe both GMWSS and KAW would benefit from having a routine and direct relationship where we can discuss operational issues, GMWSS' needs as a customer, and provide GMWSS with a direct point of contact to KAW, that is authorized to manage all GMWSS account issues.

Again, I extend my original invitation to meet with you and your team to discuss the account review and any other customer related issues. I have attached a copy of our review here for your reference.

Please reach out to me with any questions.

Thank you,

William A. Lewis

Vice President, Operation
Kentucky American Water
C: 913-217-5626
william.lewis@amwater.com

From: Andy A Lewis <William.Lewis@amwater.com>
Sent: Monday, August 21, 2026 8:47 AM

To: 'cazevedo@gmwss.com' <cazevedo@gmwss.com>

Subject: GMWSS/KAW Accounts and Interconnections

Good morning Chase,

KAW has completed its review of the existing GMWSS accounts, and we would appreciate the opportunity to review and confirm our findings with you and your team.

Would you be available for a virtual meeting later this week, either Thursday or Friday, to discuss these results? If so, I would also like to take the opportunity to introduce our Director of Operations, our Major Account Manager, and myself.

Please let me know if this would be convenient and, if so, what times would work best for your team.

Thank you for your time and consideration.

Andy



William A. Lewis

Vice President, Operation

Kentucky American Water

C: 913-217-5626

william.lewis@amwater.com

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GMWSS Account Review

August 28, 2026



1458 Burton Road

Account Owner: GMWSS
Customer Type: OPA
Account Status: Active
Account Number: 210010313470

Question: Currently listed as OPA. It is unclear what this connection services. Please confirm the use of this service connection so that the correct Customer Type may be confirmed.



Champion Way

Account Owner: GMWSS
Customer Type: Sales for Resale
Account Status: Active
Account Number: 220040961440



900 Cherry Blossom Way

Account Owner: GMWSS
Customer Type: OPA
Account Status: Active
Account Number: 210010314282



101 Double Culvert

Account Owner: GMWSS
Customer Type: OPA
Account Status: Active
Account Number: 210008254615



491 Double Culvert

Account Owner: GMWSS
Customer Type: OPA
Account Status: Active
Account Number: 210008317912



813 Sims Pike

Account Owner: GMWSS
Customer Type: OPA
Account Status: Active
Account Number: 210009992392



152 Rogers Gap Road

Account Owner: GMWSS
Customer Type: OPA
Account Status: Active
Account Number: 210008534472



101 Wrights Lane

Account Owner: GMWSS
Customer Type: OPA
Account Status: Active
Account Number: 220005338993



—
Thank you!
—

**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	08/22/2025	09/22/2025	62,200 (A)	64,815 (A)	2,615	2,615.00	261,500

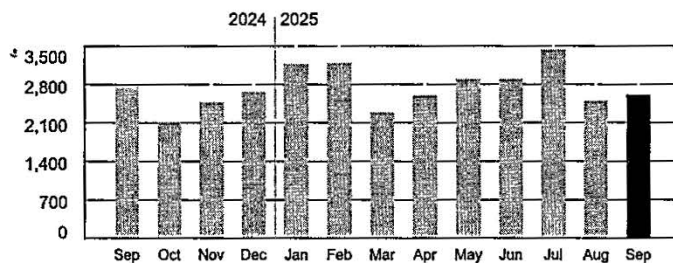
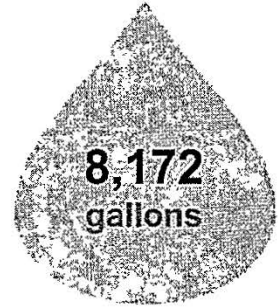
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 261,500

Billed Usage History (graph shown in 100 gallons)

- 261,500 gallons = usage for this period
- 279,600 gallons = usage for same period last year

Next Scheduled Read Date: on or about October 20, 2025
Account Type: Sale for ResaleAverage
daily use for
this period is:
(32 days)

Year to Date Billed Usage: 2,561,000 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing		1,620.42
Payments		-1,620.42
Total payments as of Sep 2. Thank you!		-1,620.42
Balance Forward		0.00
Service Related Charges - 08/22/25 to 09/22/25		
Water Service		1,434.83
Water Service Charge		139.70
Water Usage Charge	(2,615 x \$0.49527)	1,295.13
Other Charges		245.34
QIP Surcharge Water	(\$1,434.83 x 11.09%)	159.12
Georgetown Hydrant Fee	(1 x \$3.59)	3.59
KRA Withdrawal Fee	(2,615 x \$0.0316)	82.63
Total Service Related Charges		1,680.17
Taxes		2.59
School District Tax	(\$86.22 x 3.000%)	2.59
Total Current Period Charges		1,682.76

Total Amount Due

**\$1,682.76****Understanding Your Bill**

The information below defines some of the new terms you may find on your bill:

Service-Related Charges: This section includes charges for services related to water (or wastewater) service. If applicable, credits and debits for correction to previously billed charges are itemized in this section.**Fees and Adjustments:** This section provides details related to additional charges or adjustments for the service period referenced. Fees, when applicable, would include items such as service activation and late payment charges.**Surcharges:** Surcharges are used to recover changes to costs that occur between ratemaking cycles. Common surcharges include Purchased Water, Consolidated Expenses, Conservation, Intervenor Compensation and Payment Assistance.**Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.**Average Daily Use:** The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.**Still have questions?** We are here to help. Our customer service representatives are available M-F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

Para obtener asistencia con la traducción de su factura, comuníquese con nuestro Centro de Servicio al Cliente, de lunes a viernes de 7 a.m. a 7 p.m.

For more information about your charges and rates, please visit:
<https://amwater.com/kyaw/rates>



Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	09/23/2025	10/21/2025	64,815 (A)	67,202 (A)	2,387	2,387.00	238,700

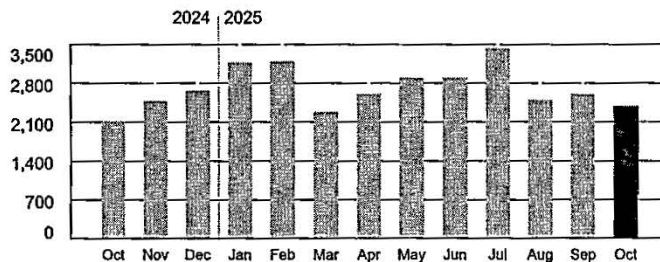
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 238,700

Billed Usage History (graph shown in 100 gallons)

- 238,700 gallons = usage for this period
- 212,700 gallons = usage for same period last year



Next Scheduled Read Date: on or about November 19, 2025
Account Type: Sale for Resale

Average
daily use for
this period is:
(29 days)



Year to Date Billed Usage: 2,799,700 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing		1,682.76
Payments		-1,682.76
Total payments as of Sep 30. Thank you!		-1,682.76
Balance Forward		0.00
Service Related Charges - 09/23/25 to 10/21/25		
Water Service		1,321.91
Water Service Charge		139.70
Water Usage Charge	(2,387 x \$0.49527)	1,182.21
Other Charges		225.62
QIP Surcharge Water	(\$1,321.91 x 11.09%)	146.60
Georgetown Hydrant Fee	(1 x \$3.59)	3.59
KRA Withdrawal Fee	(2,387 x \$0.0316)	75.43
Total Service Related Charges		1,547.53
Taxes		2.37
School District Tax	(\$79.02 x 3.000%)	2.37
Total Current Period Charges		1,549.90
Total Amount Due		\$1,549.90

Understanding Your Bill

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- Fees and Adjustments:** This section provides details related to additional charges or adjustments for the service period referenced. Fees, when applicable, would include items such as service activation and late payment charges.
- Surcharges:** Surcharges are used to recover changes to costs that occur between ratemaking cycles. Common surcharges include Purchased Water, Consolidated Expenses, Conservation, Intervenor Compensation and Payment Assistance.
- Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.
- Average Daily Use:** The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.
- Still have questions?** We are here to help. Our customer service representatives are available M-F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

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For more information about your charges and rates, please visit:
<https://amwater.com/kyaw/rates>

**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	10/22/2025	11/20/2025	67,202 (A)	68,714 (A)	1,512	1,512.00	151,200

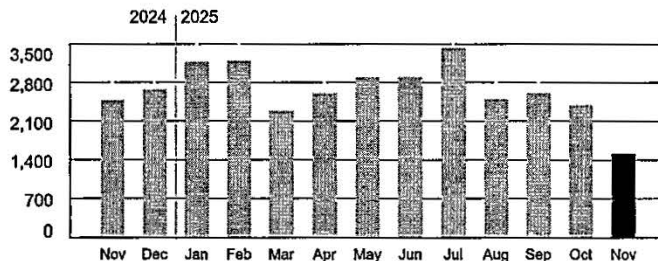
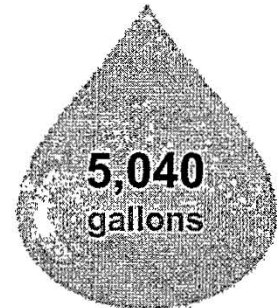
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 151,200

Billed Usage History (graph shown in 100 gallons)

- 151,200 gallons = usage for this period
- ▨ 247,200 gallons = usage for same period last year

Next Scheduled Read Date: on or about December 18, 2025
Account Type: Sale for ResaleAverage
daily use for
this period is:
(30 days)

Year to Date Billed Usage: 2,950,900 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	1,549.90
Payments	-1,549.90
Total payments as of Nov 6. Thank you!	-1,549.90
Balance Forward	0.00
Service Related Charges - 10/22/25 to 11/20/25	
Water Service	888.55
Water Service Charge	139.70
Water Usage Charge (1,512 x \$0.49527)	748.85
Other Charges	149.91
QIP Surcharge Water (\$888.55 x 11.09%)	98.54
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (1,512 x \$0.0316)	47.78
Total Service Related Charges	1,038.46
Taxes	1.54
School District Tax (\$51.37 x 3.000%)	1.54
Total Current Period Charges	1,040.00
Total Amount Due	\$1,040.00

Understanding Your Bill

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- Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.
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**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	11/21/2025	12/18/2025	68,714 (A)	69,585 (A)	871	871.00	87,100

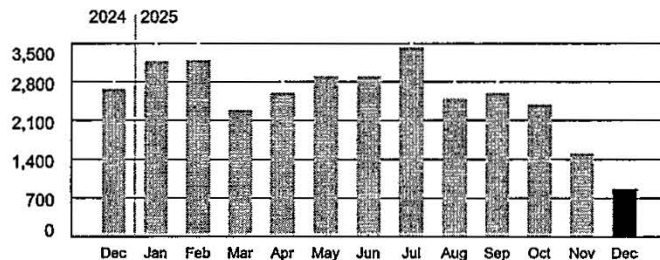
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 87,100

Billed Usage History (graph shown in 100 gallons)

- 87,100 gallons = usage for this period
■ 267,700 gallons = usage for same period last year

**Next Scheduled Read Date:** on or about January 21, 2026
Account Type: Sale for Resale

Average
daily use for
this period is:
(28 days)



Year to Date Billed Usage: 3,038,000 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	1,040.00
Payments	-1,040.00
Total payments as of Dec 1. Thank you!	-1,040.00
Balance Forward	0.00
Fees and Adjustments	-21.03
Courtesy Adjustment	-21.03
Service Related Charges - 11/21/25 to 12/18/25	
Water Service	604.40
Water Service Charge	
11/21/25 to 12/15/25	124.73
12/16/25 to 12/18/25	16.97
Water Usage Charge	
11/21/25 to 12/15/25 (777.68 x \$0.49527)	385.16
12/16/25 to 12/18/25 (93.32 x \$0.83091)	77.54
Other Charges	87.66
QIP Surcharge Water (\$509.89 x 11.09%)	56.55
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (871 x \$0.0316)	27.52
Total Service Related Charges	692.06
Taxes	0.93
School District Tax (\$31.11 x 3.000%)	0.93
Total Current Period Charges	671.96

Total Amount Due**\$671.96****Understanding Your Bill**

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- Surcharges:** Surcharges are used to recover changes to costs that occur between ratemaking cycles. Common surcharges include Purchased Water, Consolidated Expenses, Conservation, Intervenor Compensation and Payment Assistance.
- Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.
- Average Daily Use:** The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.
- Still have questions?** We are here to help. Our customer service representatives are available M-F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

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**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	12/19/2025	01/21/2026	69,585 (A)	70,705 (A)	1,120	1,120.00	112,000

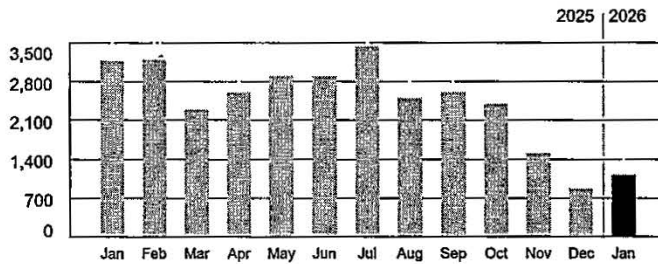
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 112,000

Billed Usage History (graph shown in 100 gallons)

- 112,000 gallons = usage for this period
- 317,500 gallons = usage for same period last year

Next Scheduled Read Date: on or about February 18, 2026
Account Type: Sale for ResaleAverage
daily use for
this period is:
(34 days)

Year to Date Billed Usage: 112,000 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	671.96
Payments	-671.96
Total payments as of Jan 5. Thank you!	-671.96
Balance Forward	0.00
Service Related Charges - 12/19/25 to 01/21/26	
Water Service	1,089.02
Water Service Charge	158.40
Water Usage Charge (1,120 x \$0.83091)	930.62
Other Charges	38.98
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (1,120 x \$0.0316)	35.39
Total Service Related Charges	1,128.00
Taxes	1.17
School District Tax (\$38.98 x 3.000%)	1.17
Total Current Period Charges	1,129.17

Total Amount Due**\$1,129.17****Understanding Your Bill**

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WE KEEP LIFE FLOWING™

Page 3 of 6
608757854432**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	01/22/2026	02/19/2026	70,705 (A)	71,622 (A)	917	917.00	91,700

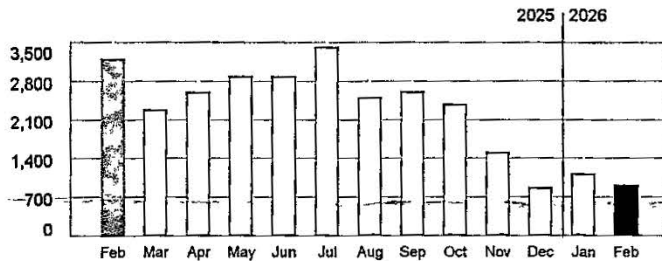
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 91,700

Billed Usage History (graph shown in 100 gallons)

- 91,700 gallons = usage for this period
- 321,100 gallons = usage for same period last year

Next Scheduled Read Date: on or about March 18, 2026
Account Type: Sale for ResaleAverage
daily use for
this period is:
(29 days)3,162
gallons

Year to Date Billed Usage: 203,700 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	1,129.17
Payments	-1,129.17
Total payments as of Feb 5. Thank you!	-1,129.17
Balance Forward	0.00
Fees and Adjustments	-3.71
Courtesy Adjustment	-3.71
Service Related Charges - 01/22/26 to 02/19/26	
Water Service	920.34
Water Service Charge	158.40
Water Usage Charge (917 x \$0.83091)	761.94
Other Charges	32.57
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (917 x \$0.0316)	28.98
Total Service Related Charges	952.91
Taxes	0.98
School District Tax (\$32.57 x 3.000%)	0.98
Total Current Period Charges	950.18

Total Amount Due

\$950.18**Understanding Your Bill**

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Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	02/20/2026	03/19/2026	71,622 (A)	72,525 (A)	903	903.00	90,300

A = Actual E = Estimate

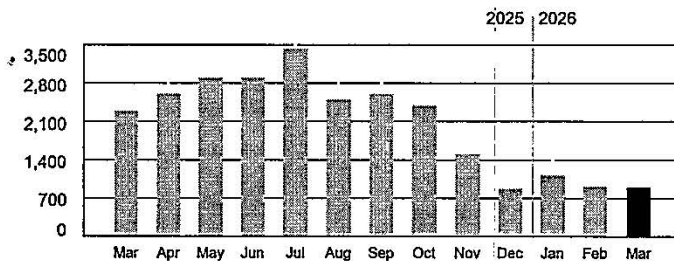
1 Billing Unit = 100 gallons

Total Gallons:

90,300

Billed Usage History (graph shown in 100 gallons)

- 90,300 gallons = usage for this period
- 228,600 gallons = usage for same period last year

Next Scheduled Read Date: on or about April 20, 2026
Account Type: Sale for ResaleAverage
daily use for
this period is:
(28 days)3,225
gallons

Year to Date Billed Usage: 294,000 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	950.18
Payments	-950.18
Total payments as of Mar 3. Thank you!	-950.18
Balance Forward	0.00
Service Related Charges - 02/20/26 to 03/19/26	
Water Service	908.71
Water Service Charge	158.40
Water Usage Charge (903 x \$0.83091)	750.31
Other Charges	32.12
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (903 x \$0.0316)	28.53
Total Service Related Charges	940.83
Taxes	0.96
School District Tax (\$32.12 x 3.000%)	0.96
Total Current Period Charges	941.79
Total Amount Due	\$941.79

Understanding Your Bill

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**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	03/20/2026	04/17/2026	72,525 (A)	73,547 (A)	1,022	1,022.00	102,200

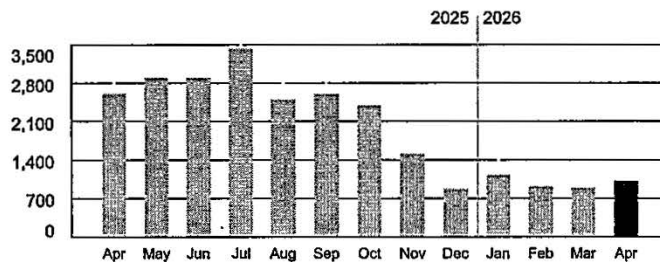
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 102,200

Billed Usage History (graph shown in 100 gallons)

- 102,200 gallons = usage for this period
- ▨ 260,200 gallons = usage for same period last year

Next Scheduled Read Date: on or about May 19, 2026
Account Type: Sale for ResaleAverage
daily use for
this period is:
(29 days)

Year to Date Billed Usage: 396,200 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	941.79
Payments	-941.79
Total payments as of Apr 1. Thank you!	-941.79
Balance Forward	0.00
Service Related Charges - 03/20/26 to 04/17/26	
Water Service	1,007.59
Water Service Charge	158.40
Water Usage Charge (1,022 x \$0.83091)	849.19
Other Charges	33.98
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee	
03/20/26 to 03/30/26 (387.65 x \$0.0316)	12.25
03/31/26 to 04/17/26 (634.35 x \$0.0286)	18.14
Total Service Related Charges	1,041.57
Total Current Period Charges	1,041.57

Total Amount Due ➡ **\$1,041.57****Understanding Your Bill**

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**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
64774945	100 gal	2"	04/18/2026	05/19/2026	73,547 (A)	75,154 (E)	1,607	1,607.00	160,700

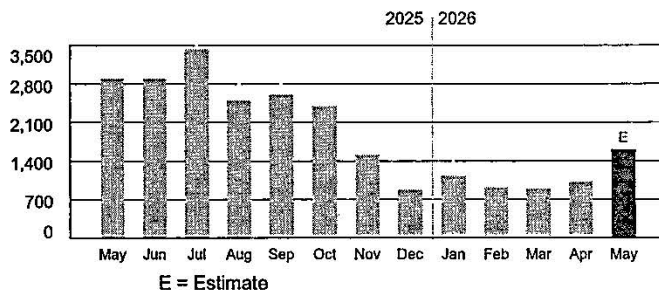
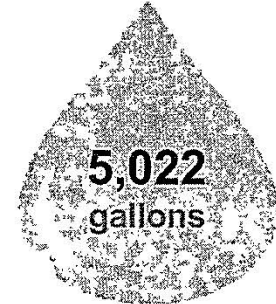
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 160,700

Billed Usage History (graph shown in 100 gallons)

- 160,700 gallons = usage for this period
- 289,400 gallons = usage for same period last year

Next Scheduled Read Date: on or about June 17, 2026
Account Type: Sale for ResaleAverage
daily use for
this period is:
(32 days)

Year to Date Billed Usage: 556,900 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	1,041.57
Payments	-1,041.57
Total payments as of May 5. Thank you!	-1,041.57
Balance Forward	0.00
Service Related Charges - 04/18/26 to 05/19/26	
Water Service	1,493.67
Water Service Charge	158.40
Water Usage Charge (1,607 x \$0.83091)	1,335.27
Other Charges	49.55
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (1,607 x \$0.0286)	45.96
Total Service Related Charges	1,543.22
Taxes	1.49
School District Tax (\$49.55 x 3.000%)	1.49
Total Current Period Charges	1,544.71

Total Amount Due**\$1,544.71****Understanding Your Bill**

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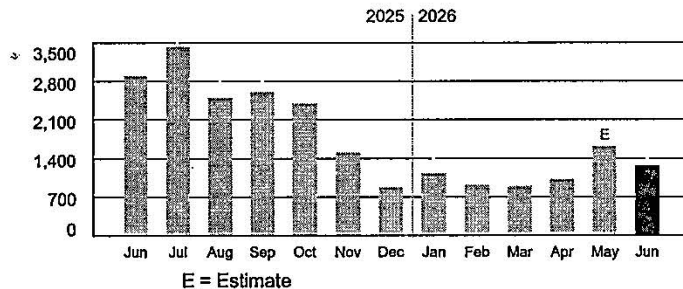


Meter Reading and Usage Summary

Please see additional pages for meter reading details

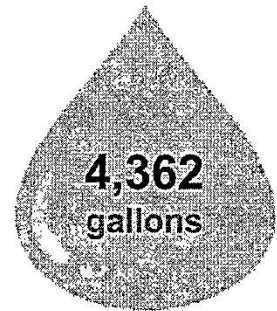
Billed Usage History (graph shown in 100 gallons)

- 126,500 gallons = usage for this period
- 289,500 gallons = usage for same period last year



Next Scheduled Read Date: on or about July 20, 2026
Account Type: Sale for Resale

Average
daily use for
this period is:
(29 days)



Year to Date Billed Usage: 683,400 gallons

Account Detail

Account No. 1012-210010314282
Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	1,544.71
Payments	-1,544.71
Total payments as of Jun 8. Thank you!	-1,544.71
Balance Forward	0.00
Service Related Charges - 05/20/26 to 06/17/26	
Water Service	1,209.50
Water Service Charge	
05/20/26 to 05/20/26	5.46
05/21/26 to 06/17/26	152.94
Water Usage Charge (1,265 x \$0.83091)	1,051.10
Other Charges	39.77
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (1,265 x \$0.0286)	36.18
Total Service Related Charges	1,249.27
Taxes	1.19
School District Tax (\$39.77 x 3.000%)	1.19
Total Current Period Charges	1,250.46
Total Amount Due	\$1,250.46

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**Meter Reading and Usage Summary**

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
27953268	100 gal	2"	06/18/2026	07/20/2026	1,528 (A)	2,855 (A)	1,327	1,327.00	132,700

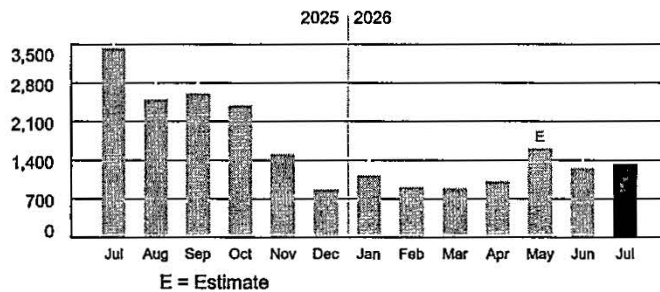
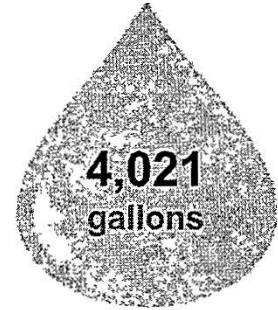
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 132,700

Billed Usage History (graph shown in 100 gallons)

- 132,700 gallons = usage for this period
- 342,400 gallons = usage for same period last year

Next Scheduled Read Date: on or about August 19, 2026
Account Type: Sale for ResaleAverage
daily use for
this period is:
(33 days)

Year to Date Billed Usage: 816,100 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	1,250.46
Payments	-1,250.46
Total payments as of Jul 6. Thank you!	-1,250.46
Balance Forward	0.00
Service Related Charges - 06/18/26 to 07/20/26	
Water Service	1,261.02
Water Service Charge	158.40
Water Usage Charge (1,327 x \$0.83091)	1,102.62
Other Charges	41.54
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (1,327 x \$0.0286)	37.95
Total Service Related Charges	1,302.56
Taxes	1.25
School District Tax (\$41.54 x 3.000%)	1.25
Total Current Period Charges	1,303.81

Total Amount Due

**\$1,303.81****Understanding Your Bill**

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**Meter Reading and Usage Summary**

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27953268	100 gal	2"	07/21/2026	08/19/2026	2,855 (A)	3,817 (A)	962	962.00	96,200

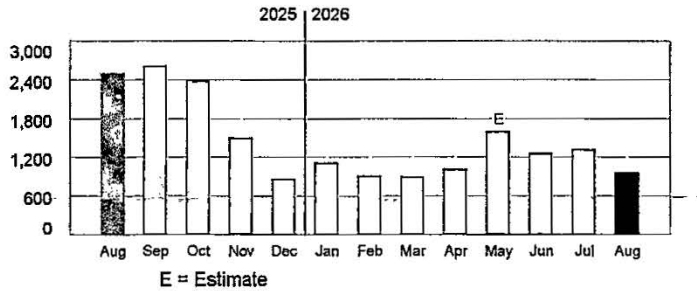
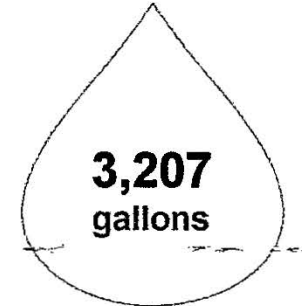
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 96,200

Billed Usage History (graph shown in 100 gallons)

- 96,200 gallons = usage for this period
- 250,800 gallons = usage for same period last year

Next Scheduled Read Date: on or about September 18, 2026
Account Type: Other Public AuthorityAverage
daily use for
this period is:
(30 days)

Year to Date Billed Usage: 912,300 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY

Prior Billing	1,303.81
Payments	-1,303.81
Total payments as of Aug 4. Thank you!	-1,303.81
Balance Forward	0.00
Fees and Adjustments	-7.03
Courtesy Adjustment	-7.03
Service Related Charges - 07/21/26 to 08/19/26	
Water Service	931.34
Water Service Charge	158.40
Water Usage Charge (962 x \$0.80347)	772.94
Other Charges	31.10
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (962 x \$0.0286)	27.51
Total Service Related Charges	962.44
Taxes	28.87
School District Tax (\$962.44 x 3.000%)	28.87
Total Current Period Charges	984.28

Total Amount Due **\$984.28****Understanding Your Bill**

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Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
060734097N	100 CF	2"	12/22/2022	01/24/2023	27,878 (A)	28,094 (A)	216	1,615.68	161,568

A = Actual E = Estimate

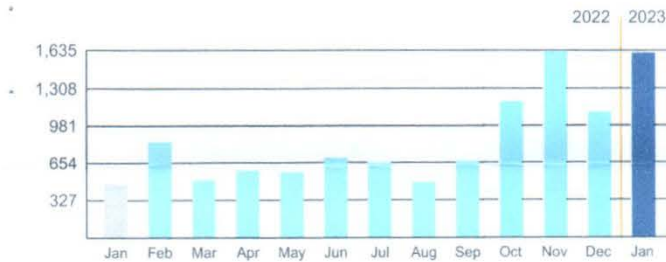
1 CF = 7.48 gallons

1 Billing Unit = 100 gallons

Total Gallons: 161,568

Billed Usage History (graph shown in 100 gallons)

- 161,568 gallons = usage for this period
- 47,124 gallons = usage for same period last year



Next Scheduled Read Date: on or about February 17, 2023
Account Type: Other Public Authority

Average
daily use for
this period is:
(34 days)

4,752
gallons

Year to Date Billed Usage: 161,568 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY
40324-9563

Prior Billing 728.12

Payments -728.12

Total payments as of Jan 9. Thank you! -728.12

Balance Forward 0.00

Service Related Charges - 12/22/22 to 01/24/23

Water Service 894.38
Water Service Charge 119.50
Water Usage Charge (1,615.68 x \$0.4796) 774.88

Other Charges 85.66
QIP Surcharge Water (\$894.38 x 4.61%) 41.23
KRA Withdrawal Fee (1,615.68 x \$0.0275) 44.43

Total Service Related Charges 980.04

Taxes 29.40
School District Tax (\$980.04 x 3.000%) 29.40

Total Current Period Charges 1,009.44

Total Amount Due \$1,009.44

Understanding Your Bill

The information below defines some of the new terms you may find on your bill:

- Service Related Charges:** This section includes charges for services related to water (or wastewater) service. If applicable, credits and debits for correction to previously billed charges are itemized in this section.
- Fees and Adjustments:** This section provides details related to additional charges or adjustments for the service period referenced. Fees, when applicable, would include items such as service activation and late payment charges.
- Surcharges:** Surcharges are used to recover changes to costs that occur between ratemaking cycles. Common surcharges include Purchased Water, Consolidated Expenses, Conservation, Intervenor Compensation and Payment Assistance.
- Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.
- Average Daily Use:** The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.
- Still have questions?** We are here to help. Our customer service representatives are available M-F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

Para obtener asistencia con la traducción de su factura, comuníquese con nuestro Centro de Servicio al Cliente, de lunes a viernes de 7 a.m. a 7 p.m.

For more information about your charges and rates, please visit:
<https://amwater.com/kyaw/rates>





Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
060734097N	100 CF	2"	01/25/2023	02/21/2023	28,094 (A)	28,273 (A)	179	1,338.92	133,892

A = Actual E = Estimate

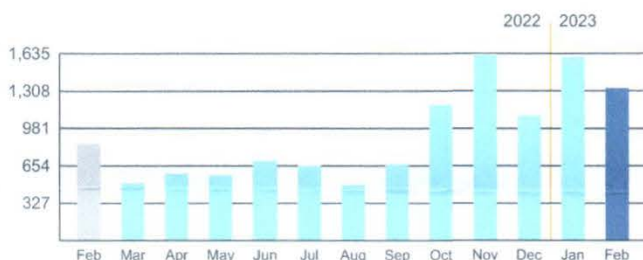
1 CF = 7.48 gallons

1 Billing Unit = 100 gallons

Total Gallons: 133,892

Billed Usage History (graph shown in 100 gallons)

- 133,892 gallons = usage for this period
- 84,524 gallons = usage for same period last year

Next Scheduled Read Date: on or about March 20, 2023
Account Type: Sale for ResaleAverage
daily use for
this period is:
(28 days)**4,782**
gallons

Year to Date Billed Usage: 295,460 gallons

Account Detail

Account No. 1012-210010314282

Service To: 900 CHERRY BLOSSOM WAY GEORGETOWN, KY
40324-9563

Prior Billing 1,009.44

Payments -1,009.44

Total payments as of Feb 6. Thank you! -1,009.44

Balance Forward 0.00

Service Related Charges - 01/25/23 to 02/21/23

Water Service 686.67

Water Service Charge 119.50

Water Usage Charge (1,338.92 x \$0.4236) 567.17

Other Charges 68.48

QIP Surcharge Water (\$686.67 x 4.61%) 31.66

KRA Withdrawal Fee (1,338.92 x \$0.0275) 36.82

Total Service Related Charges 755.15

Total Current Period Charges 755.15

Total Amount Due

**\$755.15**

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- Fees and Adjustments:** This section provides details related to additional charges or adjustments for the service period referenced. Fees, when applicable, would include items such as service activation and late payment charges.
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Para obtener asistencia con la traducción de su factura, comuníquese con nuestro Centro de Servicio al Cliente, de lunes a viernes de 7 a.m. a 7 p.m.

For more information about your charges and rates, please visit:
<https://amwater.com/kyaw/rates>

Request

2. Refer to the Azevedo Direct Testimony, page 5, lines 1- 4; page 9, lines 1-16; and page 11, lines 11-16.
 - a. Provide, by month, the gallons purchased from Kentucky-American at the Champion Way interconnection (Champion Way) from January 1, 2021, through the most recent month available, and identify the operational reason for each month in which water was purchased
 - b. Provide all contracts, emergency water-use agreements interconnection agreements, amendments, extensions, renewal notices, and operating protocols that have governed or currently govern service through Champion Way.
 - c. Confirm whether the documents provided in response to Item 2(b) constitute all agreements that have governed or currently govern water service provided by Kentucky-American to Georgetown Water and Sewer through Champion Way. For each agreement, identify the Commission case in which it was approved; state its original effective date and term; describe any automatic-renewal provisions; identify the date of its most recent renewal and its current expiration or renewal date; and state whether Georgetown Water and Sewer and Kentucky-American continue to operate under its terms. If the parties currently operate without an effective Commission-approved agreement, explain the basis under which the service is provided.
 - d. State whether Georgetown Water and Sewer considers the Champion Way service to be firm, continuing service, or standby or emergency service.
 - e. Explain the basis for the response in Item 2(d). Include in the response the tariff classification and rate treatment Georgetown Water and Sewer considers appropriate.
 - f. Provide all communications with Kentucky-American concerning that classification or rate treatment.
-

Response

- a. See the table attached as 01-0028 for billed usage at the Champion Way interconnection since January 1, 2021, through August 19, 2026. Gaps in billed service periods are times of zero purchases.
- b. The KAWC Tariff has governed and currently governs water service provided by KAWC to GMWSS through the Champion Way interconnection. The current tariffed meter rates

and service charges for Service Classification No.1, including the Sales for Resale category (P.S.C. KY no. 10, 1st Rev'd Sheet No. 29), became effective December 16, 2025, the date of the Commission's final Order setting rates in Case No. 2025-00112 (see Appendix B thereto).

The "Emergency Connection Agreement" signed in May 1999 and produced by KAWC in response to GMWSS DR 12 ("1999 Emergency Agreement") may also have governed instances of such service in the past. To the extent that it has not been modified, terminated, revoked, or non-renewed, the 1999 Emergency Agreement also may currently govern such service. The 1999 Emergency Agreement became effective on May 10, 1999, with a 10-year term. Renewals (or not), termination, and modification are provided for in Agreement §§ 1, 10, and 15(e), respectively. GMWSS is unaware of any Commission approval of the 1999 Emergency Agreement or of renewal after the initial 10-year term, and has not found any record of (non)renewal, termination, or modification or any reference to continuation after the initial 10 year term.

The basis under which service is provided is demonstrated by the course of conduct between GMWSS and KAWC with respect to the interconnection:

- GMWSS has no record, recollection, or other reason to think that it has ever supplied water to KAWC through the interconnection, and understands that the facilities in and around the interconnection would need to be added to or otherwise modified in order for it to be physically possible for KAWC to receive water at the interconnection.

- As shown by the table included in response to 1 PSC 02.a, GMWSS's receipt/purchase of water from KAWC at the Champion Way interconnection is not continuous and is requested when GMWSS needs water for its system customers beyond that supplied by its Royal Spring treatment plant and by the Frankfort Plant Board ("FPB").
- To receive water from KAWC at Champion Way, GMWSS contacts KAWC and requests that it install the meter to complete the interconnection. GMWSS personnel do not recall an instance in which KAWC has not installed the meter when requested. After KAWC installs the meter, water is received through the Champion Way interconnection into the GMWSS system without any pumping at the interconnection. When GMWSS's need to supplement Royal Spring and FPB supply is over, GMWSS informs KAWC and KAWC eventually removes the meter. To limit unintended flow of water into its system before KAWC removes the meter, GMWSS usually closes the valve installed on its side of the meter.
- KAWC invoices GMWSS for the periods of time between KAWC installation and removal of the meter, in full months generally running between the 18th day and 24th day of succeeding calendar months and for partial months depending on when the meter is installed and removed. The invoices appear to be based on KAWC's Tariff consumption rates for Sales for Resale and a service charge for a 6" meter.

- c. See the response to 1 PSC 2.b. It is GMWSS's understanding that Sales for Resale service can be obtained under KAWC's Tariff without a special written contract. The 1999 Emergency Agreement is the only written/formal agreement that GMWSS is aware has been executed with KAWC for water service.
- d. GMWSS does not take firm, continuing service from KAWC at the Champion Way interconnection. As described and shown in the response to 1 PSC 02.a-b above, the meter is removed from the interconnection (by KAWC) and GMWSS takes no service there for many months of the year. GMWSS considers KAWC service through the Champion Way interconnection to be as-available only upon GMWSS request and only if KAWC decides to supply it (and installs the meter); service depends on KAWC's water availability and decision in response to its request. The suggested categories of "standby" or "emergency" service are not defined in the request, so GMWSS does not know whether they capture the characteristics of the service.
- e. The practical basis for GMWSS's response to 1 PSC 02.d above is its actual experience in requesting and receiving service from KAWC through the Champion Way interconnection. See especially the responses to 1 PSC 02.a&b above.

The rate treatment that GMWSS considers appropriate for the service through the Champion Way interconnection is based on the characteristics of the service and generally-applicable ratemaking principles. That appropriate treatment is not reflected in KAWC's Tariff.

As noted above, GMWSS's service at the Champion Way interconnection is not firm, continuing service because many months out of the year the physical connection is not there for GMWSS to be able to take water service when and if it wants. GMWSS does not think of this as "standby," as KAWC is not able at all times to immediately provide water at that location without coordination and a process of reconnection and meter installation. In the context of electricity service consistent with the Public Utility Regulatory Policies Act, "standby" ordinarily does not require coordination of installation of facilities each time before service is provided.

GMWSS considers KAWC service through the Champion Way interconnection to be "as available," only upon GMWSS request and only when KAWC decides to supply it (and installs the meter); service depends on KAWC's water availability and decision in response to its request. In addition, the service at Champion Way is not consumed by GMWSS for end-use, but is for utility resale to its customers. That precondition for applying KAWC's "Sale for Resale" terms to the service, however, is insufficient for ratemaking purposes. That factual basis is not concerned with the frequency, duration, timing or volume of demand by the purchasing utility — all of which are cost of service and rate classification considerations. As with KAWC's other rate classifications, its tariff's Sale for Resale class definition is narrowly focused on the intended use of water after it passes through the meter, to the exclusion of other factors listed in KRS 278.030(2).

Since GMWSS's service is not firm and is provided as-available, GMWSS should be charged a rate for service at the Champion Way interconnection that reflects the fact that service is a sale for resale, while also taking into account the "nature of the use, the quality used, the quantity used, [and] the time when used," pursuant to KRS 278.030. As explained in GMWSS's response to 1 PSC 07, that volumetric rate should hew much more closely to KAWC's marginal cost of water produced, rather than contributing the most towards system fixed costs on a volumetric basis as KAWC's highest usage rate.

- f. Other than in response to 1 PSC 02.e above, GMWSS has not expressed to KAWC what classification and rate treatment it considers are appropriate to the service through the Champion Way interconnection.

Georgetown Municipal Water & Sewer Service
Water Purchased from KAWC at Champion Way
For Period: 1/1/21 - 8/19/26

GMWSS FY	KAWC Invoice Period		Gallons Charged	Operational Reason for Usage
	From	To		
2022	8/20/21	8/21/21	424,000	Basin cleaning
2023	10/25/22	11/18/22	445,060	Replacement of raw water meter – 1 day (Oct.26, 2022)
2025	7/17/24	7/31/24	3,572,994	Basin cleaning — 3 days (July 15-17, 2024)
2025	7/20/24	8/20/24	509,600	Basin cleaning
2025	8/21/24	9/19/24	100	probably residual usage at end of previous metered period
2025	9/26/24	11/23/24	368,100	Repairs to FPB booster station – 1 day (Sep. 27, 2024)
2026	9/16/25	10/20/25	454,900	Raw water availability, low flow from Royal Spring
2026	10/21/25	11/19/25	1,944,300	Raw water availability, low flow from Royal Spring — 4 days (Sep. 19-22, 2025)
2026	11/20/25	11/30/25	5,200	probably residual usage at end of previous metered period
2026	2/4/26	5/19/26	51,413,900	Royal Spring Water Treatment Plant shut down for repairs (Feb.5-Mar.10, 2026)
2027	5/20/26	6/17/26	200	probably residual usage at end of previous metered period
2027	6/18/26	7/20/26	1,323,000	8" water main break at the Water Treatment Plant
2027	7/21/26	8/19/26	100	probably residual usage at end of previous metered period

Request

3. Refer to the Azevedo Direct Testimony, page 12, lines 1-9.
 - a. Describe all discussions and written communications between Georgetown Water and Sewer and Kentucky-American concerning long-term water supply for demand exceeding the 4.0 million gallons per day (MGD) capacity of the Royal Spring Water Treatment Plant. For each discussion or communication, identify the date and participants and describe the capacity or volume, required infrastructure, proposed rate or contract terms, and current status.
 - b. Provide the request for information, request for proposals, and all responses, proposals, and other nonprivileged supporting documents received from or provided to Kentucky-American that have not already been filed in this proceeding.
 - c. State whether Kentucky-American remains under consideration as a supplier and reconcile that response with Mr. Azevedo's statement in his Direct Testimony on page 14, lines 1-4 that Georgetown Water and Sewer cannot give serious consideration to Kentucky-American's tariffed rates.
-

Response

- a. There have been written communications between GMWSS and KAWC recently and going back 2-3 years regarding long-term water supply to GMWSS, including the exchange of materials in connection with GMWSS-issued requests for information and proposals. Attached hereto are the following RFI/RFP materials:

<u>Issued/sent date</u>	<u>Description/title</u>	<u>Attachment pages</u>
9/26/25	GMWSS Request for Information (RFI): Wholesale Water Supply	01-0029 to 01-0035
10/10/25	KAWC Response to RFI	01-0075 to 01-0081
10/17/25	GMWSS Request for Proposals (RFP): Wholesale Water Supply	01-0036 to 01-0052
11/14/25	RFP Supplier Question Responses (issued by GMWSS)	01-0053 to 01-0054
11/21/25	KAWC Response to RFP	01-0055 to 01-0074

<u>Issued/sent date</u>	<u>Description/title</u>	<u>Attachment pages</u>
8/26/26	GMWSS request for additional information from KAWC	01-0082 to 01-0083

There have been emails exchanged on this topic with KAWC's Susan Lancho and Charlie Bolton, as listed below and attached hereto. In addition and around the same time, there have been meetings or other unwritten exchanges with KAWC personnel about long-term water supply to GMWSS, but for which after due search we do not have the details requested.

<u>Email date*</u>	<u>between</u>	<u>Attachment pages</u>
10/30/23	Chase Azevedo (GMWSS) and Susan Lancho (KAWC)	01-0084 to 01-0085
7/26/24	C. Azevedo (GMWSS) and S. Lancho (KAWC)	01-0086 to 01-0090
10/3/25	C. Azevedo (GMWSS), with bcc to persons indicating an interest, including Charlie Bolton (KAWC)	01-0091 to 01-0093
10/13/25	C. Azevedo (GMWSS) and C. Bolton (KAWC)	01-0094 to 01-0096
11/21/25 2:03 p.m.	C. Azevedo (GMWSS) and C. Bolton (KAWC)	01-0097 to 01-0099
11/21/25 2:09 p.m.	C. Azevedo (GMWSS) and C. Bolton (KAWC)	01-0100

* the last email date if a chain of emails

- b. See response to 1 PSC 03.a, above.
- c. Yes, KAWC and its proposal responding to the 10/17/25 RFP remain under consideration as a possible long-term, increased supplier of water to GMWSS, as demonstrated by the

8/6/26 letter to KAWC requesting additional information related to its proposal, attached as 01-0082 to 01-0083.

- d. KAWC has advantages from an infrastructure standpoint, because of its 42” main that supplies the Champion Way interconnection. However, the high level and erratic increases to its wholesale rates are a serious counterweight to thinking of KAWC as a reliable supplier for GMWSS and its customers. The 2022 Water Source Assessment (provided in response to 1 PSC 06) analyzed alternatives in which KAWC would be a long-term supplier, but noted that KAWC’s then current rate of \$4.21 per 1000 gallons was the highest among the suppliers considered; thus, a KAWC alternative had “the lowest construction cost but one of the highest purchase costs,” indicating that it would be “not as cost-effective over time” as alternatives in which the Frankfort Plant Board or the Louisville Water Company would be the supplier. Assessment p.46. The Assessment based its purchase-cost calculations on projections out to 2045 of rates that increased 10% at 5-year intervals (pp.40-41). The rate projected for 2040-45 for KAWC was “only” \$5.60 per 1000 gallons (p.41), and yet the level of KAWC wholesale rates was part of the reason that KAWC alternatives were not recommended in the Assessment. The increases in KAWC wholesale rates since 2022 have meant that GMWSS is now paying a rate higher than that projected for 2045 — which would only further tilt the recommendation against KAWC alternatives.

Request

8. Refer to the Azevedo Direct Testimony, page 12, lines 11-18, and page 13, lines 1-9.
 - a. Provide the calculations and assumptions supporting the approximately \$11.05 per 1,000 gallons hypothetical rate.
 - b. Explain the statement that the previously ordered rate of \$8.3091 was \$1.4825 more than Kentucky-American's proposed rate of \$6.9266 when the mathematical difference between those rates is \$1.3825 and provide any necessary correction to the testimony.
-

Response

- a. As noted in lines 12-14 on page 12 of the Azevedo Direct Testimony, the Sales for Resale rate set in the 12/16/25 Order in Case No. 2025-00122 (\$8.3091 per 1000 gallons) added 28 percentage points to the increase proposed by Kentucky-American:

$$\frac{\text{KAWC proposed rate}}{\text{then-existing rate}} = \frac{6.9266}{4.9527} = 1.40, \text{ a 40\% increase}$$

$$\frac{12/16/25 \text{ Ordered rate}}{\text{then-existing rate}} = \frac{8.3091}{4.9527} = 1.68, \text{ a 68\% increase}$$

$$68\% - 40\% = 28\%, \text{ adding 28 percentage points to the increase}$$

If the final Order in this case adds 28 percentage points to the increase proposed by Kentucky-American (to \$8.7371 per 1000 gallons), then the Sales for Resale rate would become approximately \$11.05 per 1000 gallons.

$$\text{existing rate} = 8.3091$$

$$8.3091 \times 0.28 = 2.3265 \quad \text{amount of a 28\% increase}$$

$$8.7371 + 2.3265 = 11.0636 \quad \text{which rounds down to approx. \$11.05 per 1000 gallons}$$



Georgetown Municipal Water and Sewer Service

Request for Information (RFI)

Wholesale Water Supply

RFI Issue Date: September 26, 2025

RFI Question Deadline: October 3, 2025

RFI Submittal Deadline: October 10, 2025, at 2:00 PM EDT

1. INTRODUCTION

Georgetown Municipal Water and Sewer Service (GMWSS) is committed to providing a high-quality, reliable supply of drinking water to its customers at the best value and lowest cost. To meet the needs of existing and future customers, GMWSS has identified the need for a reliable long-term finished water supply to supplement its current raw water source and treatment infrastructure.

Several regional water utilities have been identified as potential wholesale water suppliers (WWS). Through this Request for Information (RFI), GMWSS is seeking input from interested WWS regarding their ability and willingness to serve as a long-term supplier of finished water. The information collected will be used by GMWSS to develop a shortlist of suppliers who will receive Request for Proposal (RFP) materials.



2. COMMUNICATIONS

Questions regarding this RFI must be submitted via email by Friday, October 3, 2025, at 2:00 PM EDT to:

Chase Azevedo, PE
General Manager
Georgetown Municipal Water and Sewer Service
Email: cazevedo@gmwss.com

Contact with any other GMWSS personnel, members of the Board of Commissioners, or elected officials (including Georgetown City Council members and Scott County Fiscal Court) regarding this RFI is grounds for disqualification.

3. BACKGROUND

GMWSS has historically received water from Royal Spring, with treatment at an adjacent water treatment plant (WTP). GMWSS also relies on purchased water from the Frankfort Plant Board, which supplies GMWSS through a water booster pump station and distribution mains. Kentucky American Water Company periodically provides supply to GMWSS under emergency conditions.

The WTP requires significant upgrades, but those improvements will not provide additional capacity, as Royal Spring does not have adequate supply to meet GMWSS's projected demands. With customer demand expected to increase significantly in the coming decades, GMWSS has decided to explore securing additional finished water through a WWS to supplement its existing WTP production and ensure long-term supply reliability.

4. PROJECT DESCRIPTION

Based on current planning projections, GMWSS's average daily demand (ADD) is expected to increase from approximately 3.9–4.5 MGD today to 7.5–10.0 MGD by 2045. The maximum daily demand (MDD) is projected to increase from approximately 6.9 MGD to 15.0 MGD over the same period. Table 1 provides the projected timing for GMWSS's estimated demands (sourced from GRW, 2022 Water Source Assessment). These projections represent total system demand for GMWSS, and GMWSS will determine in the future how much of this demand will continue to be produced at its existing WTP and how much will be purchased through a wholesale water supply agreement. For context, the existing WTP has a maximum production capacity of 4.0 MGD, underscoring the need for supplemental supply.



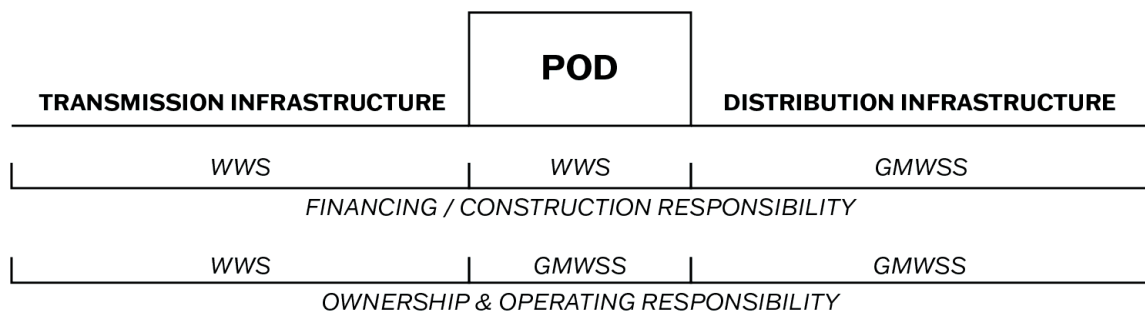
Table 1. GMWSS Demand Projections

YEAR	LOW PROJECTION ADD (MGD)	LOW PROJECTION MDD (MGD)	HIGH PROJECTION ADD (MGD)	HIGH PROJECTION MDD (MGD)
2030	5.10	7.65	6.10	9.20
2035	5.80	8.70	7.25	10.88
2040	6.60	9.90	8.40	12.60
2045	7.50	11.25	10.00	15.00

This project will be broken into three primary components, illustrated in Figure 1:

- a. **Transmission Infrastructure** – The WWS will finance and construct the transmission mains and any associated pumping facilities required to deliver finished water to the Point of Delivery (POD). Transmission facilities upstream of the POD will remain owned and operated by the WWS.
- b. **Point of Delivery (POD)** – The POD, to be located in the vicinity of Cane Run Road and Greathouse Run/Frontage Road, will consist of a ground storage tank (5 MG), a high service pump station, and any associated facilities necessary to maintain required delivery pressures. The WWS will finance and construct the POD, and the initial required delivery hydraulic grade is 900 feet +/- into a ground storage tank. The water booster pump station discharge into GMWSS distribution system is to a hydraulic grade of 1024 feet +/- . Once constructed, the POD and its facilities will be dedicated to GMWSS for ownership and operation. The water delivered at the POD must meet all requirements of the Safe Drinking Water Act and applicable Commonwealth of Kentucky drinking water standards.

Figure 1 (Conceptual Diagram of Project Components and Associated Responsibilities):



This RFI will be used to gauge whether the WWS is interested in entering into a water purchase agreement to provide finished water to GMWSS on a long-term basis.



5. REQUESTED INFORMATION

Respondents are asked to provide clear and complete responses to the following items:

- 1) Confirm whether your utility has the capacity to supply GMWSS's projected demands as described in Table 1 within its current infrastructure. If not, specify the maximum volume you could provide.
- 2) Confirm interest in and willingness to provide finished water to GMWSS on a wholesale basis.
- 3) Identify and describe your raw water sources.
- 4) Indicate whether delivery of the contracted volume is subject to limitations on water availability, and if so, describe those limitations.
- 5) Confirm willingness to construct the necessary transmission and POD infrastructure in the vicinity of Cane Run Road and Greathouse Run/Frontage Road.
- 6) Are you willing to provide an allowance, recoverable through the rate structure, to fund infrastructure improvements (transmission and POD) serving GMWSS customers? If so, provide an estimated allowance.
- 7) Confirm willingness to enter into a long-term agreement (25, 50 or 75 years) and indicate your preferred term. Indicate any legal limitations you may have related to the execution of a long-term water supply Agreement.
- 8) Confirm willingness to enter into an agreement based on all-inclusive volumetric rates. If not, describe your preferred rate structure, minimum purchase requirements, or up-front capital contributions.
- 9) Describe your methodology for future rate adjustments.
- 10) Indicate whether the rates charged to GMWSS under the proposed agreement would be affected by the acquisition of other utilities by your organization.
- 11) Indicate whether GMWSS would need to treat the finished water post-delivery to maintain compliance with the Safe Drinking Water Act or Commonwealth of Kentucky requirements. If so, explain.
- 12) Identify the residual disinfectant used by the WWS for treatment of finished water.
- 13) Indicate whether Public Service Commission (PSC) oversight would restrict your ability to enter into a long-term contract with guaranteed rates. If yes, explain.
- 14) Provide any recommendations to GMWSS for improving affordability and reliability of the proposed wholesale water supply, including but not limited to constructability, contract type, rate structure, hydraulics, and operability.

6. CONTRACT TYPE

Based on the information provided in response to this RFI, GMWSS will develop a shortlist of suppliers to receive an RFP. GMWSS will enter into discussions regarding a wholesale water purchase agreement with the preferred WWS based on proposals submitted in response to the RFP.

7. PROCUREMENT SCHEDULE

MILESTONE	DATE/TIME
RFI ISSUED	September 26, 2025
LAST DAY FOR RFI QUESTIONS	October 3, 2025 – 2:00 PM EDT
RFI RESPONSES DUE	October 10, 2025 – 2:00 PM EDT
TENTATIVE RFP ISSUE DATE	October 17, 2025
TENTATIVE LAST DAY FOR RFP QUESTIONS	November 5, 2025
PROPOSAL DEADLINE	November 21, 2025 – 2:00 PM EST

8. RESPONSE INSTRUCTIONS

- a. Submission method:** Email your complete response to:

Chase Azevedo, PE
General Manager
Georgetown Municipal Water and Sewer Service
Email: cazevedo@gmwss.com

- b. Email subject line:** “RFI Response – Wholesale Water Supply – [Your Utility Name]”
- c. File format:** Submit the completed Appendix A – RFI Response Form (fillable PDF provided with this RFI). Additional narrative or supporting materials may be attached as needed.
- d. Deadline:** Responses must be received by Friday, October 10, 2025, at 2:00 PM EDT.
- e. Labeling:** Clearly mark the cover page of any supplemental narrative as “RFI Response – Wholesale Water Supply.” Specify the question number for written explanations.
- f. Confidentiality:** Identify any confidential/proprietary information; GMWSS will treat such information to the extent permitted by law.
- g. Receipt:** If you require confirmation of receipt, request it in your email; an acknowledgment will be sent.

**APPENDIX A – RFI RESPONSE FORM**

Wholesale Water Supply – Georgetown Municipal Water and Sewer Service

Respondent Utility Name:**Contact Person:****Title:****Phone:****Email:**

Please provide written explanations as attachments to this form. Responses must not exceed 6 pages and be formatted in no smaller than 11-point font.

1. Does the WWS have the capacity within its current infrastructure to supply GMWSS's projected demands shown in Table 1?

YEAR	LOW PROJECTION ADD (MGD)	LOW PROJECTION MDD (MGD)	HIGH PROJECTION ADD (MGD)	HIGH PROJECTION MDD (MGD)
2030	5.10	7.65	6.10	9.20
2035	5.80	8.70	7.25	10.88
2040	6.60	9.90	8.40	12.60
2045	7.50	11.25	10.00	15.00

- ☐ Yes ☐ No – our maximum guaranteed capacity within our current infrastructure is as follows:

2030: _____ MGD 2035: _____ MGD

2040: _____ MGD 2045: _____ MGD

2. Are you interested in and willing to provide finished water to GMWSS on a wholesale basis?

- ☐ Yes ☐ No

3. Identify and describe your raw water sources.

4. Would delivery of the contracted volume be limited by water availability?

- ☐ No ☐ Yes – describe

5. Are you willing to construct the necessary transmission infrastructure and POD (storage tank and high service pump station in the vicinity of Cane Run Road/Greathouse Run Road) per the hydraulic conditions in Section 4B?

- ☐ Yes ☐ No

6. Are you willing to provide an allowance, recoverable through the rate structure, to fund infrastructure improvements (transmission and POD) serving GMWSS customers?

- ☐ Yes – estimated allowance: \$ ☐ No



7. **Would you be willing to enter a long-term agreement with GMWSS?** Indicate any legal limitations you may have related to the execution of a long-term water supply Agreement. *Check all that apply, circle preferred term.*
- ☐ Yes – 25 years ☐ Yes – 50 years ☐ Yes – 75 years ☐ Other – explain
8. **Would you agree to an all-inclusive volumetric rate?**
- ☐ Yes ☐ No – explain
9. **Describe the methodology for calculation for GMWSS future rate adjustments.**
10. **Would the rates charged to GMWSS under the proposed agreement be affected by the acquisition of other utilities by your organization?**
- ☐ No ☐ Yes – explain
11. **Would finished water delivered at the POD require additional treatment by GMWSS to comply with the Safe Drinking Water Act or Kentucky standards?**
- ☐ No ☐ Yes – explain
12. **What disinfectant does your utility use for treatment of finished water?**
- ☐ Chloramines ☐ Free Chlorine
13. **Will Public Service Commission (PSC) oversight restrict your ability to enter into a long-term contract with guaranteed rates?**
- ☐ No ☐ Yes – explain
14. **Provide any recommendations to GMWSS for improving affordability and reliability of the proposed wholesale water supply, including but not limited to constructability, contract type, rate structure, hydraulics, and operability.**

Signature of Authorized Representative

Date



Georgetown Municipal Water and Sewer Service

Request for Proposals (RFP)

Wholesale Water Supply

RFP Issue Date: October 17, 2025

RFP Question Deadline: November 12, 2025

RFP Submittal Deadline: November 21, 2025, at 2:00 PM EST

1. INTRODUCTION

Georgetown Municipal Water and Sewer Service (GMWSS) is committed to providing a high-quality, reliable supply of drinking water to its customers at the best value and lowest cost. To meet the needs of existing and future customers, GMWSS has identified the need for a reliable, long-term finished water supply to supplement its current raw water source and treatment infrastructure.

Several regional water utilities have been identified as potential Wholesale Water Suppliers (WWS). GMWSS previously issued a Request for Information (RFI) to assess capacity, willingness, and preliminary terms, and to develop a shortlist of qualified suppliers. This RFP serves as a continuation of the RFI and will help GMWSS identify the best alternative(s) for long-term finished water supply. Some questions from the previously issued RFI are repeated within this RFP for record purposes.

Through this Request for Proposals (RFP), GMWSS is inviting shortlisted utilities to submit proposals to enter into a long-term agreement to provide finished water to GMWSS.



2. COMMUNICATIONS

Questions regarding this RFP must be submitted via email by Wednesday, November 12, 2025, at 2:00 PM EST to:

Chase Azevedo, PE
General Manager
Georgetown Municipal Water and Sewer Service
Email: cazevedo@gmwss.com

Contact with any other GMWSS personnel, members of the Board of Commissioners, or elected officials (including Georgetown City Council members and Scott County Fiscal Court) regarding this RFP is grounds for disqualification from this procurement process.

3. BACKGROUND

Raw water for GMWSS has historically been provided from Royal Spring, with treatment at the adjacent water treatment plant (WTP). GMWSS also relies on purchased water from the Frankfort Plant Board (FPB), which supplies GMWSS through a water booster pump station and distribution mains. Kentucky American Water (KAW) periodically provides supply to GMWSS under emergency conditions.

The WTP requires significant upgrades, but those improvements will not provide additional capacity, as Royal Spring does not have adequate supply to meet GMWSS's projected demands. With customer demand expected to increase significantly in the coming decades, GMWSS has decided to secure additional finished water through a WWS to supplement its existing WTP capacity and ensure long-term finished water supply reliability.

Sale of the system of GMWSS is not considered part of this RFP. Do not include language related to purchase of GMWSS or its system in the proposal or other submitted documents.

4. PROJECT DESCRIPTION

Based on current planning projections, GMWSS's average daily demand (ADD) is expected to increase from approximately 3.9–4.5 million gallons per day (MGD) today to 7.5–10.0 MGD by 2045. The maximum daily demand (MDD) is projected to increase to approximately 11.25 MGD to 15.0 MGD over the same period. Table 1 provides the projected timing for GMWSS's estimated demands (sourced from GRW, 2022 Water Source Assessment). These projections represent total system demand for GMWSS, and GMWSS will determine in the future how much of this demand will continue to be produced at its existing WTP and how much will be purchased from a WWS. For context, the existing Royal Spring has a

maximum water withdrawal permit of 4.0 MGD from the Kentucky River Authority, underscoring the need for supplemental supply.

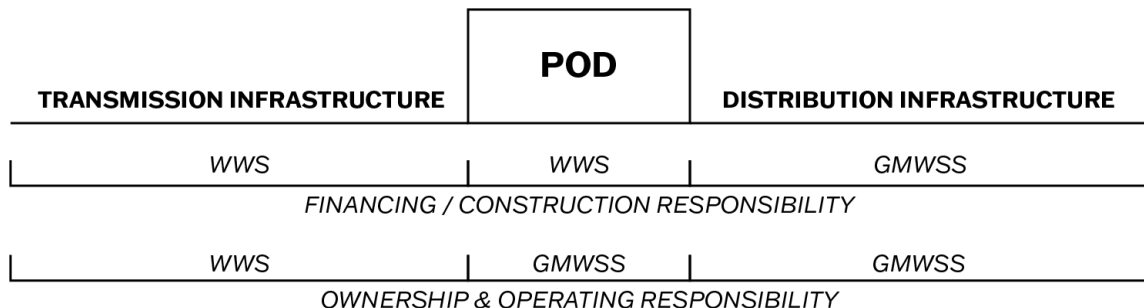
Table 1. GMWSS Demand Projections

YEAR	LOW PROJECTION ADD (MGD)	LOW PROJECTION MDD (MGD)	HIGH PROJECTION ADD (MGD)	HIGH PROJECTION MDD (MGD)
2030	5.10	7.65	6.10	9.20
2035	5.80	8.70	7.25	10.88
2040	6.60	9.90	8.40	12.60
2045	7.50	11.25	10.00	15.00

This project will be broken into three primary components, illustrated in Figure 1:

- Transmission Infrastructure** – The WWS will finance and construct the transmission mains and any associated pumping facilities required to deliver finished water to the Point of Delivery (POD). Transmission facilities upstream of the POD site will be owned and operated by the WWS.
- Point of Delivery (POD)** – The POD site, to be located in the vicinity of Cane Run Road and Greathouse Run/Frontage Road, will consist of a 5 million gallon (MG) ground storage tank, a high service pump station, a chemical feed system for boosting chlorine, and any associated facilities necessary to receive and pump finished water at the required delivery pressures. The WWS will finance and construct the POD facilities to ensure the initial required delivery at the specified hydraulic grade of 900 feet +/- into the ground storage tank. The high service pump station discharge into GMWSS distribution system is to a hydraulic grade of 1024 feet +/- . Once constructed, the POD and its facilities will be dedicated to GMWSS for ownership and perpetual operation. The water delivered at the POD site must meet all requirements of the Safe Drinking Water Act and applicable Commonwealth of Kentucky drinking water standards.

Figure 1 (Conceptual Diagram of Project Components and Associated Responsibilities):





5. PROJECT DELIVERABLES

Each proposal must include the following deliverables to ensure a complete and consistent submittal:

a. Appendices

- i. **Appendix A – Proposal Form** (signed). Respondents must complete all sections of Appendix A, including:
 1. **Capacity and Supply Commitments** – Current and projected capacity, guaranteed volumes, limitations due to water availability, minimum-purchase terms (with rates, phasing, and fees), and any existing commitments to other customers.
 2. **Rates and Financial Structure** – Billing-rate structure, fixed and variable costs, and methodology for future rate adjustments, disclosure of any rate impacts from acquisition of other utilities.
 3. **Infrastructure Responsibilities** – Confirmation of willingness to fund and construct the required transmission and POD infrastructure per the hydraulic conditions in Section 4B, with ownership of the POD facilities transferred to GMWSS and costs recovered through the rate structure.
 4. **Contract Term and Regulatory** – Preferred term of agreement (25, 50, or 75 years) and any limitations associated with Public Service Commission (PSC) or other governing body, oversight of long-term rates.
 5. **Water Quality and Treatment** – Identification and description of raw-water sources, disinfectant type, finished-water quality parameters, need for additional treatment, and record of taste, odor, or color complaints (including drought-related issues).
 6. **System Condition and Reliability** – Infrastructure age and rehabilitation percentage, major outages, boil-water advisories, and drought restrictions over the past ten years.
 7. **Recommendations** – Suggestions to improve affordability, reliability, constructability, rate structure, and overall operability of the proposed wholesale water supply arrangement.
- ii. **Appendix B – Request for Proposals Acknowledgement Form** (signed).
- iii. **Appendix C – Point of Delivery Executive Summary**
- iv. **Supporting Attachments** - Any documents necessary to support the responses in Appendix A (e.g., compliance reports, water quality data, outage logs, or system condition reports).



6. CONTRACT TYPE

GMWSS intends to execute a Water Purchase Agreement with the chosen WWS(s) based on the proposal relating to the items defined herein.

7. PROPOSAL VALIDITY PERIOD

Proposal from the WWS must remain valid for twelve (12) months.

8. PROCUREMENT SCHEDULE

MILESTONE	DATE/TIME
RFI ISSUED	September 26, 2025
LAST DAY FOR RFI QUESTIONS	October 3, 2025 – 2:00 PM EDT
RFI RESPONSES WERE DUE	October 10, 2025 – 2:00 PM EDT
RFP ISSUE DATE	October 17, 2025
LAST DAY FOR RFP QUESTIONS	November 12, 2025
PROPOSAL DEADLINE	November 21, 2025 – 2:00 PM EST

9. RESPONSE INSTRUCTIONS

- a. Submission method:** Email your complete response to:

Chase Azevedo, PE
General Manager
Georgetown Municipal Water and Sewer Service
Email: cazevedo@gmwss.com

- b. Email subject line:** “RFP Response – Wholesale Water Supply – [Your Utility Name]”
- c. File format:** Submit the completed Appendix A – RFP Response Form and Appendix B – Request for Proposals Acknowledgement Form (PDFs provided with this RFP). Additional narrative or supporting materials may be attached as needed.
- d. Deadline:** Responses must be received by Friday, November 21, 2025, at 2:00 PM EST.
- e. Labeling:** Clearly mark the cover page of any supplemental narrative as “RFP Response – Wholesale Water Supply – [Your Utility Name]” Specify the question number for written explanations.
- f. Confidentiality:** Identify any confidential/proprietary information; GMWSS will treat such information to the extent permitted by law.
- g. Receipt:** If you require confirmation of receipt, request it in your email; an acknowledgment will be sent.



- h. GMWSS reserves the right to contact WWS for clarifications and/or questions regarding its proposal.

10. SCORING OF PROPOSALS

GMWSS will evaluate, score, and rank all proposals in the best interest of the utility.

All proposals are required to include a base proposal prepared in accordance with Section 4 – Project Description of this RFP and Appendix C – Point of Delivery Executive Summary. Respondents may, at their discretion, also provide an alternate proposal that varies from the assumptions in Section 4 and Appendix C, provided it is clearly identified as such and includes corresponding rate and project approach information.



APPENDIX A – RFP RESPONSE FORM

Wholesale Water Supply – Georgetown Municipal Water and Sewer Service

Respondent Utility Name:

Contact Person:

Title:

Phone:

Email:

Please provide written explanations as attachments to this form. Responses must not exceed 25 8.5"x11" pages and be formatted in no smaller than 11-point font. Pages may be formatted to 11"x17" only for tables and exhibits.

Section 1 – Capacity and Supply Commitments

1. Does the WWS have the capacity within its current infrastructure to supply GMWSS's projected demands shown in Table 1 of the RFP and included below?

YEAR	LOW PROJECTION ADD (MGD)	LOW PROJECTION MDD (MGD)	HIGH PROJECTION ADD (MGD)	HIGH PROJECTION MDD (MGD)
2030	5.10	7.65	6.10	9.20
2035	5.80	8.70	7.25	10.88
2040	6.60	9.90	8.40	12.60
2045	7.50	11.25	10.00	15.00

- ☐ Yes ☐ No – our maximum guaranteed capacity within our current infrastructure is as follows:

2030: _____ MGD 2035: _____ MGD

2040: _____ MGD 2045: _____ MGD

2. What is the minimum guaranteed capacity the WWS can provide over the next twenty-five years?

Year	Minimum Guaranteed Capacity (MGD)
2030	
2035	
2040	
2045	
2050	

3. Would delivery of the contracted volume be limited by water availability?

☐ No ☐ Yes – describe

4. Would the WWS require a minimum purchase amount in the proposed agreement?
- a. If yes, please indicate the rate for each minimum purchase over the indicated number of years.

Year	Low Range ADD (MGD)	High Range ADD (MGD)	Rate (\$/1,000 gal)	Min. Purchase (MGD)
2030	5.1	6.1		
2035	5.8	7.25		
2040	6.6	8.4		
2045	7.5	10.0		
2050	8.5	12.0		

- b. Would the WWS offer phased implementation of any minimum purchase requirements inclusive of all fees (customer, meter, hydrant, capital improvement, etc.)? Please describe.
- c. Please list any additional fees.
5. Is any volume of your existing treatment and transmission infrastructure that would serve GMWSS currently committed or allotted to another customer or service area?

Section 2 – Rates and Financial Structure

1. Describe the proposed billing-rate structure, including fixed and variable components, and explain the methodology for future rate adjustments. List any fixed costs (i.e., expenses that are constant regardless of the volume of water treated) that may influence the rate provided to GMWSS.
2. Would the rates charged to GMWSS under the proposed agreement be affected by the acquisition of other utilities by your organization?
- ☐ No ☐ Yes – explain



Section 3 – Infrastructure Responsibilities

1. Are you willing to fund the construction of the Point of Delivery (POD) infrastructure, as described in the RFP, per the hydraulic conditions in Section 4B, with ownership of the POD to be transferred to GMWSS and costs recovered through the rate structure?

☐ Yes – enter “All” if you plan to fund the full POD cost, or enter a dollar amount if you plan to fund only a portion: \$ _____

☐ No

Section 4 – Contract Term and Regulatory

1. Would you be willing to enter a long-term agreement with GMWSS? Check all that apply, circle preferred term.

☐ Yes – 25 years ☐ Yes – 50 years ☐ Yes – 75 years ☐ Other – explain

2. Will oversight by the Public Service Commission (PSC) or other such governing body restrict your ability to enter into a long-term contract with guaranteed rates? If so, please explain any such restrictions.

☐ No ☐ Yes – explain

Section 5 – Water Quality and Treatment

1. Identify and describe your raw-water sources.
2. Would finished water delivered at the POD require additional treatment by GMWSS to comply with the Safe Drinking Water Act or Kentucky standards?

3. What disinfectant does your utility use for treatment of finished water?

☐ Chloramines ☐ Free Chlorine



4. Provide the estimated water-quality levels for the following parameters at the POD.

Parameter	Avg.	Min.	Max.
Hardness (ppm as CaCO ₃)			
pH			
Alkalinity (ppm as CaCO ₃)			
Estimated Total Chlorine Residual (ppm)			

5. Over the last ten (10) years, please provide the number of taste, odor, and color complaints. Describe the nature of these complaints and how you addressed such complaints.
6. Describe any taste, odor, or supply shortages you experienced throughout central Kentucky during drought conditions in 2019. Discuss how you addressed these issues.

Section 6 – System Condition and Reliability

- For infrastructure that will be used to serve GMWSS (i.e., treatment and transmission), what percentage of the infrastructure has been constructed or rehabilitated in the last ten (10) years?
- Over the last ten (10) years, what were the total number of major service outages on the infrastructure that will serve GMWSS (i.e., water treatment plant, transmission mains, and pumping stations)? Please describe the nature and duration of these outages.
- Over the last ten (10) years, has the WWS had any boil-water advisory notices or drought restrictions in the pressure zone that will serve GMWSS? Please describe the nature and duration of these notices or restrictions.

Section 7 – Recommendations / Alternative Proposals

- All proposals are required to include a base proposal prepared in accordance with Section 4 – Project Description of this RFP and Appendix C – Point of Delivery Executive Summary. Respondents may also provide recommendations or alternative proposals to GMWSS for improving the affordability and reliability of the proposed wholesale water supply, including but not limited to constructability, contract type, rate structure, hydraulics, and operability. Clearly identify all corresponding rate and project approach information. The total response, including any alternatives, must not exceed 25 pages.

Signature of Authorized Representative

Date



APPENDIX B – REQUEST FOR PROPOSAL ACKNOWLEDGEMENT FORM

GMWSS Water Purchase Agreement

I hereby affirm that all information provided in this proposal is accurate and complete. I certify that I am authorized to represent and act on behalf of _____ in all matters related to this proposal.

_____ acknowledges that the information provided herein will be relied upon during GMWSS’s evaluation and any misrepresentation or omission may be grounds for rejection. By signing below, I confirm our commitment to adhere to the terms and conditions specified in this proposal.

Signature of Authorized Representative

Date

Title

Organization



October 15, 2025

To: Chase Azevedo, PE

From: Josh Flanery, PE

cc: Alan Bryan, PE
Jon Schubarth, PE

**Re: Point of Delivery Evaluation
Recommendations Summary**

1. Introduction

Georgetown Municipal Water and Sewer Service (GMWSS) engaged Hazen and Sawyer to evaluate a new Point of Delivery (POD) site on a 4.3-acre parcel at Cane Run Road (Parcel ID 089-10-005.000). The scope includes ground storage, pumping facilities, flow metering, future chemical dosing provisions, permanent/temporary power, and all associated valves, piping, and sitework.

2. Point of Delivery Site

2.1 Public Water Supply Disinfection

The level of chloramine dosing required at the point of delivery depends on chlorine residual in the water being supplied to the City and the autodecomposition of chlorine residual as it travels through the water distribution system over time. For GMWSS to continue providing water with a similar residual level to customers, Hazen recommends installing a modular system for chloramine dosing, currently sized for addition of 1.5 to 2.0 ppm chlorine residual at 5 MGD, with the ability to expand for future buildout at 15 MGD. Hazen also recommends sampling for chlorine residual at the far reaches of the distribution system, and modifying the dosing rate over time to maintain the desired chlorine residual throughout the system.



2.2 Ground Storage

GMWSS requested multiple sizing options be evaluated ground storage:

- Two 2.5 MG Water Storage Tanks (Option 1)
- Two 3.75 MG Water Storage Tanks (Option 2)
- One 5 MG Water Storage Tank (Option 3)

Hazen consulted with prestressed concrete tank manufacturer CROM for typical tank dimensions. Other prestressed concrete tank manufacturers may have slightly different typical dimensions. Table 2-1 contains approximate dimensions for the recommended alternative, one 5 MGD tank.

Table 2-1, Tank Sizing Options

Option	Number of Tanks	Volume (MG)	Total Volume (MG)	Diameter (ft)	Height (ft)
3	1	5.0	5.0	169	30

2.2.1 GMWSS Mixing Preference

GMWSS has expressed a preference for baffle walls over mechanical mixing systems. It was assumed that there would be three concrete baffle walls, equally spaced inside of the tank for static mixing.

2.2.2 Ground Storage Cost and Schedule Considerations

For the OPCC, it was assumed that the tank would have a 5-year warranty and the following standard accessories:

- Interior fiberglass ladder with stainless-steel safety rail
- Exterior aluminum ladder with safety cage, cage door, and aluminum safety rail
- Roof hatch with fiberglass cover
- Fiberglass vent at center of dome roof with 24/24 polyester screen mesh
- Fiberglass liquid level indicator
- Stainless-steel wall manhole and cover
- Precast concrete overflow vents with 24/24 polyester screen mesh
- Aluminum handrail around access hatch on dome roof
- Standard exterior coating
- Standard 4" thick concrete membrane floor (This was an assumption as geotechnical information was not available.)

Given the possibility that federal funding would be used, Davis Bacon wage rates were used for cost estimating.

Since this tank will be for potable water, it must meet NSF 61 certification requirements. Because CROM does not provide NSF 61 certified concrete, the certification will need to be achieved with an interior NSF 61 certified coating.



Using the Tank Sizing from Table 2-1, the following Construction Duration (Table 2-2) was provided by CROM. This duration is broken into tank construction and coating application, in case CROM finds an NSF 61 concrete supplier and the NSF 61 certified interior coating is no longer required.

Table 2-2, Construction Durations

Option	Tank Construction Duration	Interior Coating Application Duration
3	19 weeks	4 weeks

2.3 Point of Delivery Pump Station

2.3.1 Hydraulic Considerations

The hydraulic model was utilized to determine the system curves for pump selection at the point of delivery site. System curves for the initial (2025) pumping conditions were based on water main improvements shown in Table 3-1. Parallel mains were added to the future (2045) scenario to keep the pump station discharge pressure under 150 pounds per square inch (psi).

Initial Pumping Conditions:

3,356 gallons per minute (gpm) @ 153 feet head (185 hp @ assumed 70% efficiency)

1 Duty/ 1 Standby Pump

Pumps controlled by Variable Frequency Drives (VFDs)

Future Conditions (Assumes full Buildout in 20 years):

5,233 gpm @ 320 feet head (608 hp @ assumed 70% efficiency)

2 Duty/ 1 Standby Pump

Pumps controlled by VFDs

Hazen initially assumed that the pumps would be vertical turbine or horizontal split case pumps. Both vertical turbine and horizontal split case pumps are well balanced and efficient. Hazen identified one selection, a Goulds 3430 10x14-24 horizontal split case pump, that is suitable for both the initial and future scenario. The initial condition can be met by using a motor operating at 1,200 revolutions per minute (RPM), and the future condition can be met using an 1,800 RPM motor. The pump motors would need to be replaced, and a third pump would need to be installed to provide a standby while two pumps meet the future demand conditions.

October 15, 2025



2.3.2 Electrical Considerations

Due to the difference in required motor hp between the Initial and Future Conditions, Hazen has assumed that the electrical equipment (generator, VFDs, control panels, etc.) at the point of delivery pump station will need to be replaced as development occurs within the GMWSS system and more pumping capacity is required.

Kentucky Utilities (KU) was contacted about providing three phase power to the site. Typically, KU will provide a source of power to the site for no initial fee and the costs to provide power will be factored into the rate agreement. A secondary source of power does typically require additional cost. Hazen has accounted for emergency backup power in the form of a generator.

2.4 Preliminary Site Layout

A conceptual site layout has been attached to this memorandum. The layout include one 5.0 MGD tank, piping, pump station and potential future rechloramination facilities.

3. Conclusion

3.1 Recommendations

Hazen recommends that GMWSS proceed with the following point of delivery site improvements to accommodate future purchase of wholesale water at the site.

- Installation of a new 5 MG ground storage tank with internal baffles at the point of delivery site.
- Install new site piping including a meter vault, tank bypass, and valve vaults.
- Installation of a new 5 MGD pump station (expandable to 15 MGD) at the point of delivery site.
 - For the 2025 conditions, install 1 Duty/1 Standby Pump and operate at 1,200 RPM with 200 hp motors.
 - Generator and electrical equipment to be sized for 2025 conditions, with the intent to replace as future development requires greater pumping capacity.
- As the system develops and more flow is required, install a second duty pump (for 2 Duty/1 Standby), replace motors and electrical equipment to operate at 1,800 RPM with new 600 hp motors.

3.2 Opinion of Probable Construction Costs for 2025 Improvements

The items listed in the below OPCC include: site grading, piping and valves, storage tanks and coating, booster pump station, electrical controls and standby power. One item of further consideration is the need for chloramine boosting. This item and the amount of chloramine boosting required is dependent on the source of the water supply.

October 15, 2025

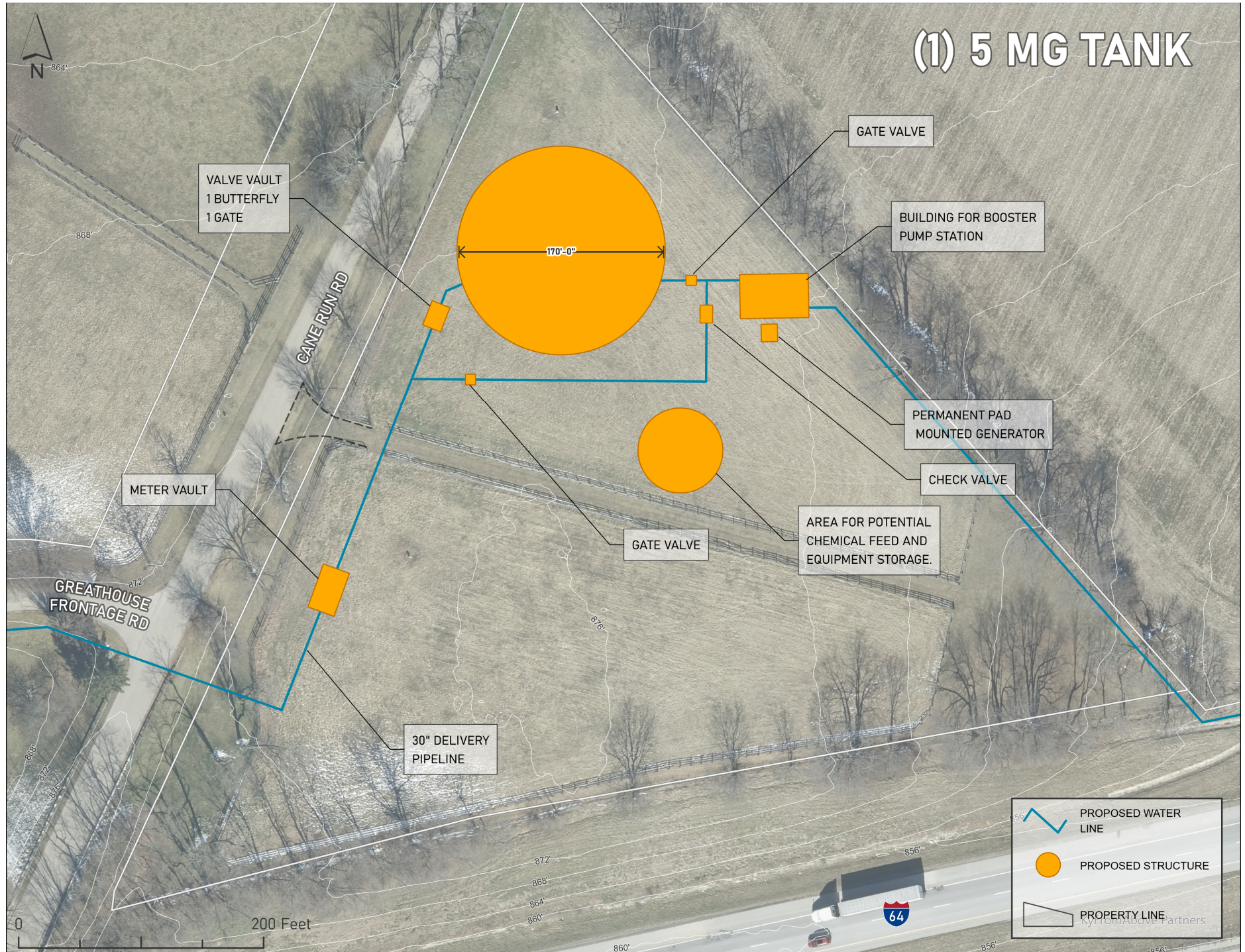


Table 3-1, 2025 Point of Delivery Improvements Opinion of Probable Construction Cost

Item	OPCC
Point of Delivery Pump Station	\$5,000,000
Ground Storage Alternatives:	
5 MG Tank	\$10,750,000
Subtotal¹	\$15,750,000
Design Contingency (30%)	\$4,725,000
Subtotal	\$20,475,000
Overhead & Profit (10%)	\$2,047,500
Construction Contingency (10%)	\$2,047,500
Total	\$24,570, 000

1. Subtotal includes Option 3 – One 5.0 MG Tank, which has the lowest cost of the three ground storage tank alternatives evaluated.

(1) 5 MG TANK





Request for Proposal (RFP) Supplier Question Responses

November 14, 2025

1. *Does Georgetown Municipal Water and Sewer Service need providers to deliver the projected ADD and MDD demands shown on page 3, table 1 of the RFP (e.g. maximum day demands of 7.65-9.2 MGD by 2030 and 8.7-10.88 MGD by 2035) or merely the difference between those values and Georgetown's existing demand of 3.9 – 4.5 million gallons / day?*

Responders' proposals should be based on delivering the projected ADD and MDD rather than the difference between the values shown on Table 1 and GMWSS's existing demand.

2. *Section 10, Scoring of Proposals, states "GMWSS will evaluate, score and rank all proposals in the best interest of the utility." Can you please identify the ranking, evaluation or scoring metrics or criteria that will be utilized by GMWSS when evaluating bids?*

The specific ranking, evaluation, and scoring metrics used will not be disclosed. Please be assured all proposals will be assessed thoroughly and fairly based on a comprehensive set of criteria to identify the solution that best meets GMWSS's needs.

3. *Section 1 Question 2: Can you please clarify what information you are requesting? In question 1, the maximum guaranteed capacity is requested, therefore, any quantity less than those numbers in Table 1 shall be available.*

GMWSS seeks to understand the minimums a provider can deliver, specifically during drought conditions.

4. *Section 5 Question 4: Is it acceptable to provide historical data taken from samples at the WTP?*

Use of historical data is acceptable, but the data should serve as the basis for the requested estimate of water quality at the proposed POD.

5. *Regarding Hazen's Point of Delivery Evaluation and Recommendation Summary: Table 2-1 states the diameter of the tank shall be 169 feet. The picture depicts a diameter of 170 feet. Which diameter should be used for this analysis?*

The diameter used for analysis should be based on the recommendation of the tank manufacturer.

6. *Regarding Hazen's Point of Delivery Evaluation and Recommendation Summary: Is there an inflow requirement for the proposed tank? For instance, do you want the inflow to the tank to match the future outflow of 10,466 gpm? Or do you prefer the inflow to be increased to accommodate potential breaks after the tank so that quantity of water delivered can accommodate a leak on the outflow side of the tank while also being able to maintain water in the tank?*

The inflow for the proposed tank should match the outflow of 10,466 gpm.

7. *Regarding Hazen's Point of Delivery Evaluation and Recommendation Summary: What future flow rate (in GPM) is expected at the existing delivery point at the current pump station?*

The existing corridor of delivery after the current pump station can provide up to 2.5 MGD. In order to increase delivery to up to approximately 5 MGD, the existing pump station and distribution infrastructure from Fishers Mill Road (Kentucky 3378) to Stamping Ground Road (Kentucky 227) would need to be upgraded.

November 21, 2025

Chase Azevedo, PE
General Manager
Georgetown Municipal Water and Sewer Service
cazevedo@gmwss.com



RFI Response – Wholesale Water Supply – Kentucky American Water

Dear Mr. Azevedo,

Kentucky American Water is happy to submit this response to the above referenced RFP. As outlined in the response instructions, attached is the completed Appendix A – RFP Response Form and supplemental documents to provide clarity to certain elements of our response. Please confirm receipt of this email.

Kentucky American Water's response addresses the infrastructure solution proposed by GMWSS, and also proposes an alternative infrastructure solution that would result in even greater affordability and reliability of long-term wholesale water provision for the Georgetown community. This is based on the capability of our existing water system, interconnections Kentucky American Water already has with GMWSS, and far less expensive new infrastructure projects to enhance supply near the location of the POD identified in the RFP. We currently serve 8,400 customer connections in Scott County and have the additional capacity to supply the wholesale water needed by GMWSS to augment the existing water supply. Kentucky American Water's proposed approach reduces the capital spend needed to provide wholesale water to GMWSS by approximately \$25M, and is a way to save both time and money in securing a wholesale water supply solution for Georgetown customers.

Thank you for the opportunity to respond to the RFI for wholesale water supply. Kentucky American Water certainly understands and supports your efforts to ensure a strong and resilient water supply for the Georgetown community and would appreciate the chance to assist you in achieving that goal. Please let us know if any clarifications are needed. We look forward to hearing from you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Burton", with a stylized flourish extending to the right.

Robert Burton, President

GMWSS –RFP Response – Wholesale Water Supply – Kentucky American Water

Section 1 – Capacity and Supply Commitments

1. Does the WWS have the capacity within its current infrastructure to supply GMWSS’s projected demands shown in Table 1 of the RFP and included below?

YEAR	LOW PROJECTION ADD (MGD)	LOW PROJECTION MDD (MGD)	HIGH PROJECTION ADD (MGD)	HIGH PROJECTION MDD (MGD)
2030	5.10	7.65	6.10	9.20
2035	5.80	8.70	7.25	10.88
2040	6.60	9.90	8.40	12.60
2045	7.50	11.25	10.00	15.00

X Yes No – our maximum guaranteed capacity within our current infrastructure is as follows:

2030: _____ MGD 2035: _____ MGD
2040: _____ MGD 2045: _____ MGD

2. What is the minimum guaranteed capacity the WWS can provide over the next twenty-five years?

KAW is capable of meeting GMWSS’s minimum, average and maximum capacity requirements noted in Table 1, Question 1 above.

3. Would delivery of the contracted volume be limited by water availability?

The only limitation to meeting the contracted volume of supply would be in the case of extreme regional drought conditions. Please note that the construction of KAW’s Kentucky River Station #2 MGD water treatment plant, which added 20 MGD of production capacity, provided significant protection from drought conditions that could impact the region by providing multiple raw water supply points on the Kentucky River. Since the construction of KRS#2, KAW has not curtailed water supply service to its direct or wholesale customers. Additionally, during 2025 Kentucky River flooding events, KAW’s operations were unaffected due to the strength and elevation of our raw water intakes, and KAW was able to supply additional water supply to other regional utilities during this event.

4. Would the WWS require a minimum purchase amount in the proposed agreement?

Kentucky American is proposing two scenarios with different minimum purchase requirements:

- **GMWSS Base Scenario:** construction of the transmission and point of delivery infrastructure specified in the RFP (including a five-million-gallon storage tank and pump station), capable of delivering

up to 15 MGD. Due to the capital costs, this solution likely would require a minimum purchase

- **KAW Lower Cost Scenario:** construction to tie GMWSS directly onto a large diameter main capable of delivering up to 15 MGD without a tank or pump station. Due to the low capital costs, this solution likely would not require a minimum purchase.

- a. If yes, please indicate the rate for each minimum purchase over the indicated number of years.

For the KAW Lower Cost Scenario, no minimum purchase is anticipated at Kentucky American's tariffed rates.

For the GMWSS Base Scenario, the minimum gallons required would depend on the rate charged. For example, if the rate charged were equal to today's authorized sale for resale rates, a 2.1 MGD minimum purchase could meet KAW's needs.

If GMWSS desires to pursue a lower rate than the published tariff rate that takes into consideration the projected high volume of water to be delivered that agreement would be considered a "special contract" and would need to be approved by the PSC to become effective. Kentucky American Water is open to negotiating and pursuing this option with GMWSS and the PSC.

Year	Low Range ADD (MGD)	High Range ADD (MGD)	Rate (\$/1,000 gal)	Min. Purchase (MGD)
2030	5.1	6.1		
2035	5.8	7.25		
2040	6.6	8.4		
2045	7.5	10.0		
2050	8.5	12.0		

- b. Would the WWS offer phased implementation of any minimum purchase requirements inclusive of all fees (customer, meter, hydrant, capital improvement, etc.)? Please describe.

For the GMWSS Base Scenario, all infrastructure costs would be incurred when the project began, so a phased approach could not likely be offered.

For the KAW Lower Cost Scenario, no minimum purchase is anticipated, so the question is not applicable.

- c. Please list any additional fees.

Fees that may be assessed by Kentucky American Water are included in its current Tariff approved by the PSC. A copy of Kentucky American Water's current effective Tariff is available at: <https://amwater.com/kyaw/resources/PDF/Customer-Service-Billing/kentucky-amwater-complete-water-tariff-2025.pdf>

As detailed in the referenced Tariff, meter charges, KRA withdrawal charges and QIP fees would be charged in addition to volumetric water charges.

5. Is any volume of your existing treatment and transmission infrastructure that would serve GMWSS currently committed or allotted to another customer or service area?

No. The volume produced by the existing treatment and transmission infrastructure serves all Kentucky American Water customers, and is fully capable of supplying the additional demand from GMWSS.

Section 2 – Rates and Financial Structure

1. Describe the proposed billing-rate structure, including fixed and variable components, and explain the methodology for future rate adjustments. List any fixed costs (i.e., expenses that are constant regardless of the volume of water treated) that may influence the rate provided to GMWSS.

In either scenario, Kentucky American anticipates capital-associated costs that do not fluctuate with the volume of water consumed. In the GMWSS Base Scenario, with a \$27.9 million capital investment, these might include \$0.5 of depreciation expense, and \$2.5mm of pre-tax return on debt and equity financing (at current authorized returns). In the KAW Lower Cost Scenario, with \$2.9 million capital investment, these might include \$68 thousand of depreciation expense and \$256 thousand of pre-tax return on debt and equity financing (at current authorized returns).

As a regulated utility, Kentucky American Water's rates are subject to approval by the Kentucky Public Service Commission. Per Kentucky American Water's PSC approved tariff, KAW's rate structure would include monthly meter service charges for metering at interconnection point(s), based on meter size, plus a volumetric charge for water purchased.

As explained in Section 1, Question 4 above, Kentucky American Water is open to negotiating and pursuing a lower rate than the published tariff rate that takes into consideration the projected high volume of water to be delivered. Because this rate would differ from Kentucky American Water's published tariff rates it would be considered a "special contract", and PSC approval of this agreement would be necessary. That agreement would also include a provision for how future rate increases could occur. Since that provision is understood and agreed to by both parties to the agreement from the beginning, the contractual obligation provides certainty for future rates. Final rates and rate structure would be subject to final contract negotiation

2. Would the rates charged to GMWSS under the proposed agreement be affected by the acquisition of other utilities by your organization?

If GMWSS is charged KAW's regulated tariff rates, the prices could be decreased or increased by all factors affecting KAW's operations. Acquisitions generally allow fixed costs to be shared by a wider customer base and increase KAW's economies of scale and purchasing power, benefiting all customers.

Section 3 – Infrastructure Responsibilities

1. Are you willing to fund the construction of the Point of Delivery (POD) infrastructure, as described in the RFP, per the hydraulic conditions in Section 4B, with ownership of the POD to be transferred to GMWSS and costs recovered through the rate structure?

Yes. KAW is willing to construct the requested infrastructure, which KAW has referred to as the GMWSS Base Scenario in its Bid Response. However, per our response in Section 7 below, KAW's existing water system is capable of meeting the current and future GMWSS projected water supply needs through existing KAW infrastructure without the construction of an additional storage tank and pumping station with only a minor pipeline extension/connection to our 42-inch main along Iron Works Pike, which would result in a measurable savings of capital costs as compared to the GMWSS Base Scenario. KAW refers to this alternative as the KAW Lower Cost Scenario in its Bid Response. In addition to the requested new connection, KAW has multiple other existing connections with GMWSS available to provide additional redundancy of supply. If KAW is the successful bidder, the

existing connections can be upgraded and/or modified, by KAW, as necessary to provide additional capacity and redundant supply. Given the strength and capacity of KAW's existing water system, this option provides the best value to GMWSS by providing multiple redundancies in a faster time frame and saves an estimated \$25M in capital investment, which ultimately benefits GMWSS' customers. See Table 1 in Section 7.

Section 4 – Contract Term and Regulatory

1. Would you be willing to enter a long-term agreement with GMWSS? Check all that apply, circle preferred term.

☒ Yes – 25 years ☐ Yes – 50 years ☐ Yes – 75 years ☐ Other – explain

Yes. KAW is willing to enter into a 25-year term with negotiated renewal options.

2. Will oversight by the Public Service Commission (PSC) or other such governing body restrict your ability to enter into a long-term contract with guaranteed rates?

If so, please explain any such restrictions.

☒ No ☐ Yes – explain

No. If GMWSS elects to enter into an agreement using KAW's published tariff rates for sale for resale supply, that rate is subject to and could change in future rate cases to be decided by the PSC, but this does not amount to any sort of "restriction." If GMWSS elects a minimum purchase volume Sale for Resale Agreement to obtain a lower rate than the published tariff rate for sale for resale, that agreement would be considered a "special contract" and would need to be approved by the PSC to become effective. KAW does not view this as a "restriction." That agreement would also include a provision for how future rate increases could occur. Since that provision is understood and agreed to by both parties to the agreement from the beginning, the contractual obligation provides certainty for future rates. Final rates and rate structure would be subject to final contract negotiation.

Section 5 – Water Quality and Treatment

1. Identify and describe your raw-water sources.

Kentucky River Pools 3 and 9, Jacobson Reservoir

2. Would finished water delivered at the POD require additional treatment by GMWSS to comply with the Safe Drinking Water Act or Kentucky standards?

No

3. What disinfectant does your utility use for treatment of finished water?

Chloramines

4. Provide the estimated water-quality levels for the following parameters at the POD.

	Kentucky River Station			Richmond Road Station			Kentucky River Station II		
Parameter	Average	Min	Max	Average	Min	Max	Average	Min	Max
Hardness (ppm as CaCo3)	145	60	280	142	70	330	142	55	280
pH	7.6	7.1	8.1	7.5	7.1	8.1	7.3	6.8	7.6
Alkalinity	73	40	125	87	36	204	92	35	145
Distribution System									
	Average	Min	Max						
Estimated Total Chlorine Residual (ppm)	2.92	0.83	3.99						
Chloramines (ppm)	2.92	0.35	3.92						

5. Over the last ten (10) years, please provide the number of taste, odor, and color complaints. Describe the nature of these complaints and how you addressed such complaints.

During the last 10 years Kentucky American Water has not had any major taste, odor, and color complaints other than the very localized type incidents that occur with routine system operations, maintenance, and repairs. The total number across our footprint of 140,000 connections averages less than 270 individual reports per year, or 0.19%. There is a well-established process by which customers can report any concerns related to taste, odor, and color and have them quickly addressed by our team of professionals. All three of our water treatment plants have been nationally recognized with Directors Awards from the American Water Works Association Partnership for Safe Water program for our long-term commitment to optimizing operations, achieving outstanding performance, and protecting public health and the environment.

6. Describe any taste, odor, or supply shortages you experienced throughout central Kentucky during drought conditions in 2019. Discuss how you addressed these issues.

None.

Section 6 – System Condition and Reliability

1. For infrastructure that will be used to serve GMWSS (i.e., treatment and transmission), what percentage of the infrastructure has been constructed or rehabilitated in the last ten (10) years?

The primary treatment and transmission infrastructure that will be used to serve GMWSS was not constructed in the past ten years. However, the 20 MGD water treatment plant, 20 MGD pump station, 3 MG tank, and 42" transmission main that will be the primary infrastructure serving GMWSS were all constructed in approximately the last 15 years. They receive routine maintenance to ensure operational reliability.

2. Over the last ten (10) years, what were the total number of major service outages on the infrastructure that will serve GMWSS (i.e., water treatment plant, transmission mains, and pumping stations)? Please describe the nature and duration of these outages.

There have been no major service outages in the last 10 years on the primary infrastructure that will serve GMWSS.

3. Over the last ten (10) years, has the WWS had any boil-water advisory notices or drought restrictions in the pressure zone that will serve GMWSS? Please describe the nature and duration of these notices or restrictions.

During the last 10 years Kentucky American Water has not had any major boil water advisories or drought restrictions in the area of our system that will serve GMWSS. There have been localized precautionary boil water advisories of the type associated with routine system operations, maintenance, and repairs, but none of a large scale with major impact.

Section 7 – Recommendations / Alternative Proposals

KAW Lower Cost Scenario: While Kentucky American Water (KAW) is able to provide the infrastructure and service of the GMWSS Base Scenario as specified in Section 4 and “Appendix C – Point of Delivery Executive Summary” of the RFP, we have developed an alternative approach to supply wholesale water to GMWSS. Our approach provides the benefits listed below to GMWSS and its customers.

- Provides 15+ MGD of capacity to serve GMWSS.
- Significantly reduces capital costs associated with the installation of infrastructure to serve GMWSS.
- Depending upon the amount of water required on day one, the KAW Lower Cost Scenario could use a phased approach that allows GMWSS to increase the supply capacity as demand within the GMWSS system increases, which reduces initial capital expenditures and provides GWMSS flexibility to best serve its customers.
- Reduces long-term operation and maintenance costs.

Table 1 summarizes the KAW Lower Cost Scenario compared to the GMWSS Base Scenario specified in the RFP. KAW’s alternative approach, if all three phases are implemented, is expected to reduce capital expenditures by approximately \$25 million.

Table 1. GMWSS Base Scenario vs. KAW Lower Cost Proposal Comparison

Alternative	Supply Capacity (MGD)	Alternative Cost	Total Cost
GMWSS Base Proposal	15¹	\$27,900,000	\$27,900,000²
<i>KAW Alternative, Phase 1</i>	2.5	\$0	
<i>KAW Alternative, Phase 2</i>	15+	\$600,000	
<i>KAW Alternative, Phase 3</i>	15+	<u>\$2,300,000</u>	
KAW Lower Cost Scenario Total	15+¹	\$2,900,000	\$2,900,000
KAW Lower Cost Scenario Cost Savings			\$25,000,000

¹High Projection MDD” from Table 1 of the RFP

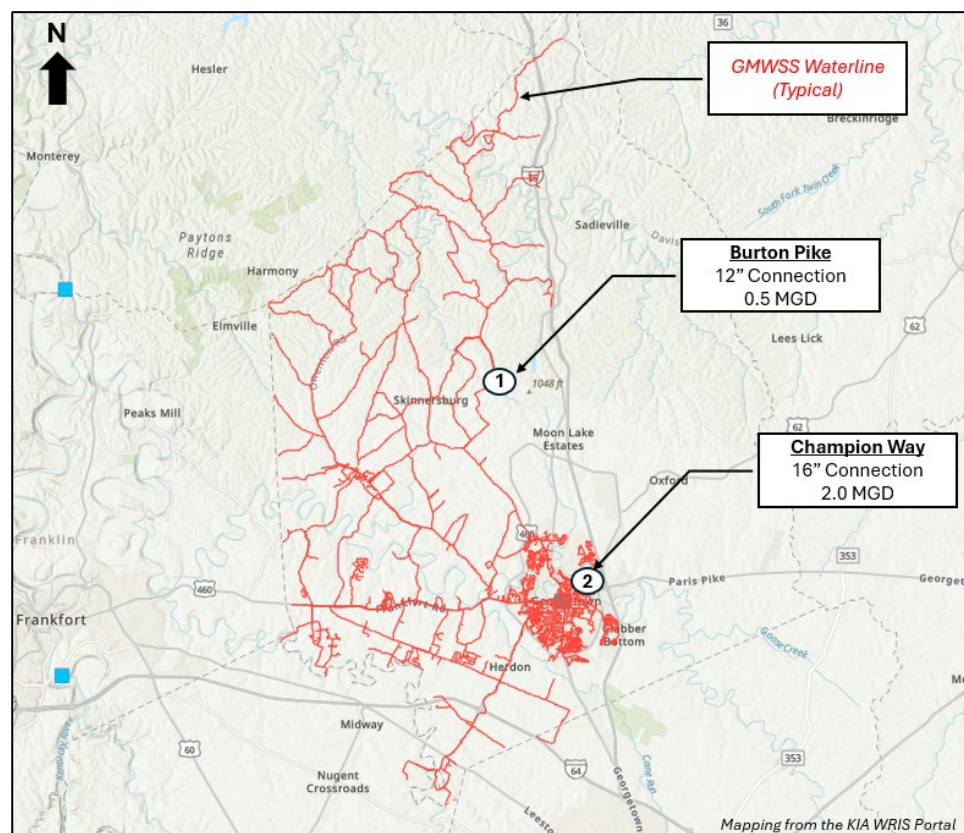
²Cost from Table 3-1 in Appendix C to the RFP

Details regarding each phase of KAW’s alternative approach are provided below.

KAW Lower Cost Scenario , Phase 1 – Utilize Existing Connections

The first phase of the KAW Lower Cost Scenario utilizes existing connections to the GMWSS system. These connections include a 12-inch connection at 1555 Burton Pike and a 16-inch connection at the intersection of Champion Way and Cherry Blossom Way, which provide approximately 0.5 MGD and 2.0 MG of capacity, respectively. With this phase, KAW can provide approximately 2.5 MGD of supply without capital costs.

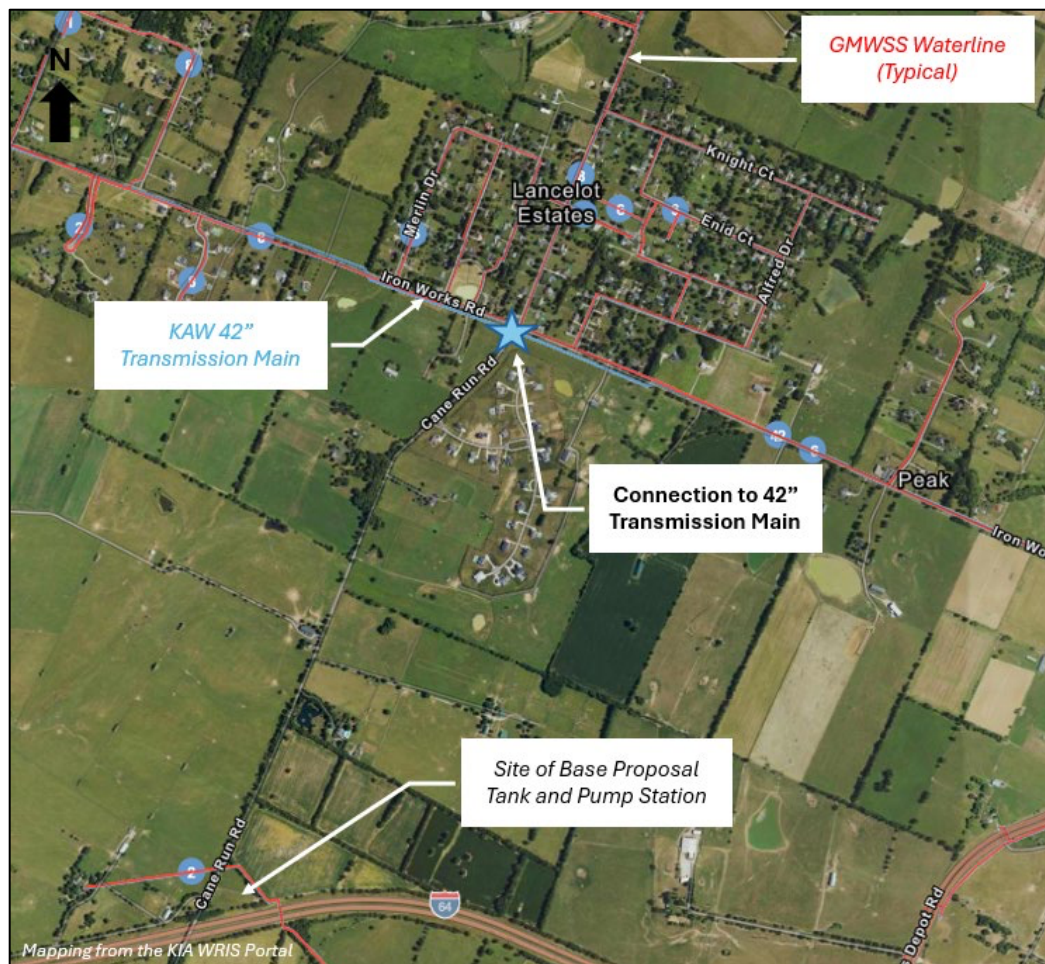
Figure 1. KAW Lower Cost Scenario – Phase 1



KAW Lower Cost Scenario, Phase 2 – Ironworks Road Connection

The second phase of the KAW Lower Cost Scenario establishes a new connection to KAW's 42" transmission main along Iron Works Road. This transmission main is supplied by a dedicated 3 MGD tank and 20 MGD pump station. KAW would install a connection and meter vault off the 42" main at the intersection of Iron Works Road and Cane Run Road. This connection would tie into GMWSS's system located north of Iron Works Road and could supply the entire "High Projection MDD" of 15 MGD specified in the RFP at an approximate HGL of 1,100'. The estimated capital cost to construct this connection is \$600,000.

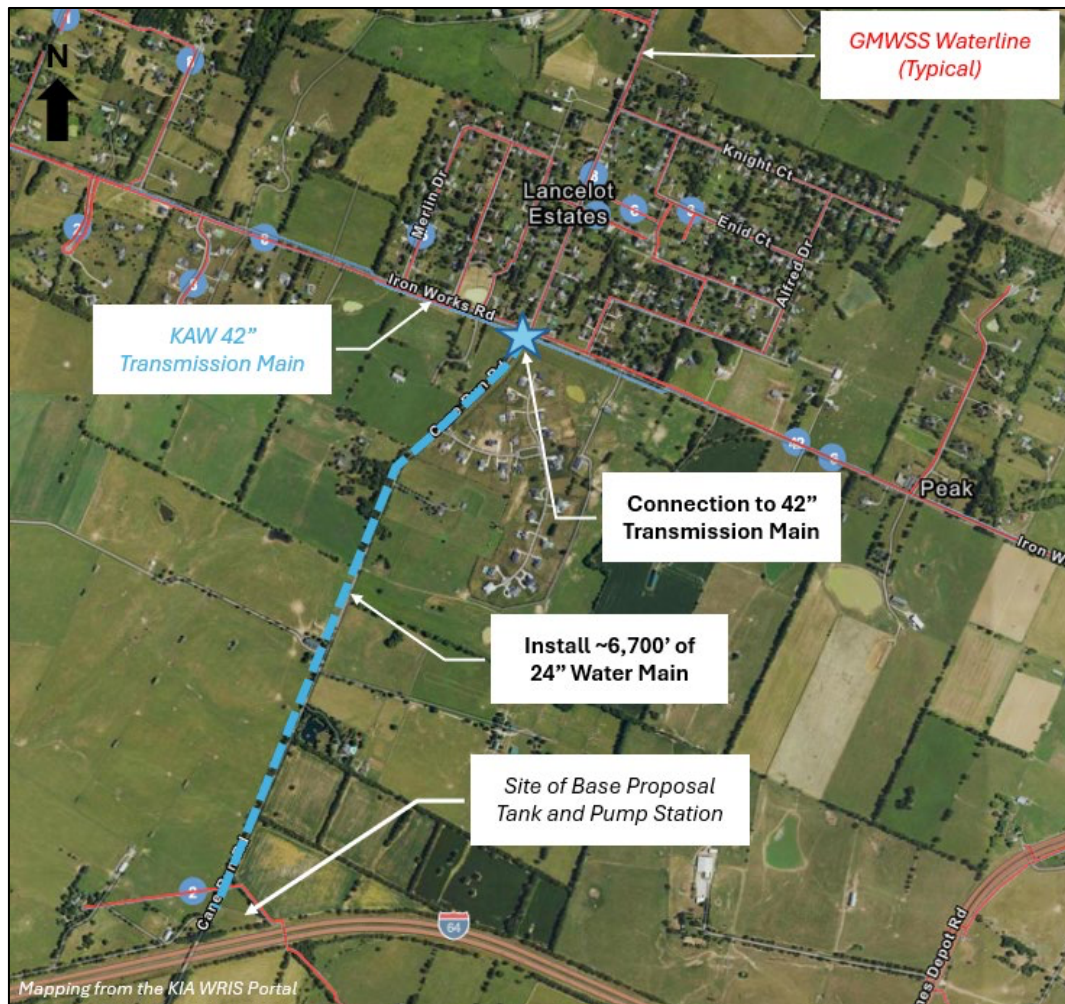
Figure 2. KAW Lower Cost Scenario – Phase 2



KAW Lower Cost Scenario, Phase 3 – Cane Run Road Main Extension

The final phase of the KAW Lower Cost Scenario constructs a 24" main extension along Cane Run Road from the connection established in Phase 2 to the proposed tank and pump station site provided in the GMWSS Base Scenario. This phase also provides a 15+ MGD supply, but provides service at the point of delivery and HGL established in the RFP. Compared to the GMWSS Base Scenario, however, this alternative eliminates the need for the construction of the 5 MG tank and pump station. The elimination of these two elements significantly reduces capital costs to an estimated cost of only \$2.9 million. Long term operation and maintenance costs will also be greatly reduced since costs for items such as tank painting, pump maintenance, pump replacement, and power will be eliminated.

Figure 2. KAW Lower Cost Scenario – Phase 3





APPENDIX A – RFP RESPONSE FORM

Wholesale Water Supply – Georgetown Municipal Water and Sewer Service

Respondent Utility Name: Kentucky American Water

Contact Person: Charlie Boland

Phone: (859) 537-0759

Title: Sr. Manager, Business Development

Email: charles.boland@amwater.com

Please provide written explanations as attachments to this form. Responses must not exceed 25 8.5"x11" pages and be formatted in no smaller than 11-point font. Pages may be formatted to 11"x17" only for tables and exhibits.

Section 1 – Capacity and Supply Commitments

- Does the WWS have the capacity within its current infrastructure to supply GMWSS's projected demands shown in Table 1 of the RFP and included below?

YEAR	LOW PROJECTION ADD (MGD)	LOW PROJECTION MDD (MGD)	HIGH PROJECTION ADD (MGD)	HIGH PROJECTION MDD (MGD)
2030	5.10	7.65	6.10	9.20
2035	5.80	8.70	7.25	10.88
2040	6.60	9.90	8.40	12.60
2045	7.50	11.25	10.00	15.00

☒ Yes ☐ No – our maximum guaranteed capacity within our current infrastructure is as follows:

2030: _____ MGD 2035: _____ MGD

2040: _____ MGD 2045: _____ MGD

- What is the minimum guaranteed capacity the WWS can provide over the next twenty-five years?

KAW is able to meet GMWSS's minimum, average and maximum capacity requirements noted in Table 1, Question 1 above.

Year	Minimum Guaranteed Capacity (MGD)
2030	
2035	
2040	
2045	
2050	

- Would delivery of the contracted volume be limited by water availability?

☐ No ☒ Yes – describe



Georgetown Municipal
Water and Sewer Service

See Response to Section 1 Question 3 on attached Response Sheet



4. Would the WWS require a minimum purchase amount in the proposed agreement?
- a. If yes, please indicate the rate for each minimum purchase over the indicated number of years.

See Response to Section 1 Question 4a, 4b, and 4c on attached Response Sheet

Year	Low Range ADD (MGD)	High Range ADD (MGD)	Rate (\$/1,000 gal)	Min. Purchase (MGD)
2030	5.1	6.1		
2035	5.8	7.25		
2040	6.6	8.4		
2045	7.5	10.0		
2050	8.5	12.0		

- b. Would the WWS offer phased implementation of any minimum purchase requirements inclusive of all fees (customer, meter, hydrant, capital improvement, etc.)? Please describe.
- c. Please list any additional fees.
5. Is any volume of your existing treatment and transmission infrastructure that would serve GMWSS currently committed or allotted to another customer or service area?

No. The volume produced by the existing treatment and transmission infrastructure serves all Kentucky American Water customers, and is fully capable of supplying the additional demand from GMWSS.

Section 2 – Rates and Financial Structure

1. Describe the proposed billing-rate structure, including fixed and variable components, and explain the methodology for future rate adjustments. List any fixed costs (i.e., expenses that are constant regardless of the volume of water treated) that may influence the rate provided to GMWSS.

See Response to Section 2 Question 1 on attached Response Sheet

2. Would the rates charged to GMWSS under the proposed agreement be affected by the acquisition of other utilities by your organization?

No X ☐ Yes – explain

See Response to Section 2 Question 2 on attached Response Sheet



Section 3 – Infrastructure Responsibilities

1. Are you willing to fund the construction of the Point of Delivery (POD) infrastructure, as described in the RFP, per the hydraulic conditions in Section 4B, with ownership of the POD to be transferred to GMWSS and costs recovered through the rate structure?

☒ Yes – enter "All" if you plan to fund the full POD cost, or enter a dollar amount if you plan to fund only a portion: \$ _____ See Response to Section 3 Question 1 on attached Response Sheet

☐ No

Section 4 – Contract Term and Regulatory

1. Would you be willing to enter a long-term agreement with GMWSS? Check all that apply, circle preferred term.

☐ X Yes – 25 years ☐ Yes – 50 years ☐ Yes – 75 years ☐ Other – explain

Yes. KAW is willing to enter into a 25-year term with negotiated renewal options.

2. Will oversight by the Public Service Commission (PSC) or other such governing body restrict your ability to enter into a long-term contract with guaranteed rates? If so, please explain any such restrictions.

☒ No ☐ Yes – explain

See Response to Section 4 Question 2 on attached Response Sheet

Section 5 – Water Quality and Treatment

1. Identify and describe your raw-water sources. Kentucky River Pools 3 and 9, Jacobson Reservoir
2. Would finished water delivered at the POD require additional treatment by GMWSS to comply with the Safe Drinking Water Act or Kentucky standards? No
3. What disinfectant does your utility use for treatment of finished water?
☒ Chloramines ☐ Free Chlorine



4. Provide the estimated water-quality levels for the following parameters at the POD.

See Response to Section 5 Question 4 on attached Response Sheet

Parameter	Avg.	Min.	Max.
Hardness (ppm as CaCO ₃)			
pH			
Alkalinity (ppm as CaCO ₃)			
Estimated Total Chlorine Residual (ppm)			

5. Over the last ten (10) years, please provide the number of taste, odor, and color complaints. Describe the nature of these complaints and how you addressed such complaints.

See Response to Section 5 Question 5 on attached Response Sheet

6. Describe any taste, odor, or supply shortages you experienced throughout central Kentucky during drought conditions in 2019. Discuss how you addressed these issues.

See Response to Section 5 Question 6 on attached Response Sheet

Section 6 – System Condition and Reliability

1. For infrastructure that will be used to serve GMWSS (i.e., treatment and transmission), what percentage of the infrastructure has been constructed or rehabilitated in the last ten (10) years?

See Response to Section 6 Question 1 on attached Response Sheet

2. Over the last ten (10) years, what were the total number of major service outages on the infrastructure that will serve GMWSS (i.e., water treatment plant, transmission mains, and pumping stations)? Please describe the nature and duration of these outages.

See Response to Section 6 Question 2 on attached Response Sheet

3. Over the last ten (10) years, has the WWS had any boil-water advisory notices or drought restrictions in the pressure zone that will serve GMWSS? Please describe the nature and duration of these notices or restrictions.

See Response to Section 6 Question 3 on attached Response Sheet



Section 7 – Recommendations / Alternative Proposals

1. All proposals are required to include a base proposal prepared in accordance with Section 4 – Project Description of this RFP and Appendix C – Point of Delivery Executive Summary. Respondents may also provide recommendations or alternative proposals to GMWSS for improving the affordability and reliability of the proposed wholesale water supply, including but not limited to constructability, contract type, rate structure, hydraulics, and operability. Clearly identify all corresponding rate and project approach information. The total response, including any alternatives, must not exceed 25 pages.

See Response to Section 7 Question 1 on attached Response Sheet

A handwritten signature in blue ink, appearing to read "Robert", written over a horizontal line.

November 21, 2025

Signature of Authorized Representative

Date





APPENDIX B – REQUEST FOR PROPOSAL ACKNOWLEDGEMENT FORM
GMWSS Water Purchase Agreement

I hereby affirm that all information provided in this proposal is accurate and complete.
I certify that I am authorized to represent and act on behalf of Kentucky American
Water in all matters related to this proposal.

Rob Burton acknowledges that the information provided herein will be relied upon
during GMWSS’s evaluation and any misrepresentation or omission may be grounds
for rejection. By signing below, I confirm our commitment to adhere to the terms and
conditions specified in this proposal.

A handwritten signature in blue ink, appearing to read "Rob Burton", written over a horizontal line.

November 21, 2025

Signature of Authorized Representative

Date

President

Kentucky American Water

Title

Organization

October 10, 2025

Chase Azevedo, PE
General Manager
Georgetown Municipal Water and Sewer Service
cazevedo@gmwss.com



RFI Response – Wholesale Water Supply – Kentucky American Water

Dear Mr. Azevedo,

Kentucky American Water is happy to submit this response to the above referenced RFI. As outlined in the response instructions, attached is the completed Appendix A – RFI Response Form and supplemental documents to provide clarity to certain elements of our response. Please confirm receipt of this email.

Our response first addresses the infrastructure solution proposed by GMWSS as described in the RFI.

Kentucky American Water is also proposing an alternative infrastructure solution that would result in even greater affordability and reliability of long-term wholesale water provision for the Georgetown community. This is based on the capability of our existing water system, interconnections Kentucky American Water already has with GMWSS, and far less expensive new infrastructure projects to enhance supply near the location of the POD identified in the RFI. We currently serve 8,400 customer connections in Scott County and have additional capacity to supply the wholesale water needed by GMWSS to augment the existing water supply. Kentucky American Water recommends this modified approach as a way to save both time and money in securing a wholesale water supply solution for Georgetown customers.

While not the subject of this RFI, another alternative solution worth evaluating is the potential future acquisition of the Georgetown system by Kentucky American Water. The benefits for Georgetown residents and local government could be significant, to include addressing ongoing water supply concerns, affordability and reliability for the foreseeable future, as well as financial acquisition proceeds that can be used to pay off existing utility debt obligations and fund other important community priorities. This option could be explored with no commitment in a manner that would give GMWSS and City of Georgetown leadership valuable information about another viable water supply option to consider for the future. In the interest of reviewing all available options for Georgetown, we would be happy to have an initial conversation at any time to provide more details.

Thank you for the opportunity to respond to the RFI for wholesale water supply. Kentucky American Water certainly understands and supports your efforts to ensure a strong and resilient water supply for the Georgetown community and would appreciate the chance to assist you in achieving that goal. Please let us know if any clarifications are needed. We look forward to hearing from you.

Sincerely,



Robert Burton, President



APPENDIX A – RFI RESPONSE FORM

Wholesale Water Supply – Georgetown Municipal Water and Sewer Service

Respondent Utility Name: Kentucky American Water

Contact Person: Charlie Boland

Phone: (859) 537-0759

Title: Sr. Manager Business Development

Email: charles.boland@amwater.com

Please provide written explanations as attachments to this form. Responses must not exceed 6 pages and be formatted in no smaller than 11-point font.

1. Does the WWS have the capacity within its current infrastructure to supply GMWSS's projected demands shown in Table 1?

YEAR	LOW PROJECTION ADD (MGD)	LOW PROJECTION MDD (MGD)	HIGH PROJECTION ADD (MGD)	HIGH PROJECTION MDD (MGD)
2030	5.10	7.65	6.10	9.20
2035	5.80	8.70	7.25	10.88
2040	6.60	9.90	8.40	12.60
2045	7.50	11.25	10.00	15.00

☒ Yes ☐ No – our maximum guaranteed capacity within our current infrastructure is as follows:

2030: _____ MGD 2035: _____ MGD

2040: _____ MGD 2045: _____ MGD

2. Are you interested in and willing to provide finished water to GMWSS on a wholesale basis?

☒ Yes ☐ No

3. Identify and describe your raw water sources. Kentucky River Pools 3 and 9, Jacobson Reservoir

4. Would delivery of the contracted volume be limited by water availability?

☐ No ☒ Yes – describe See #4 on attached list of RFI questions

5. Are you willing to construct the necessary transmission infrastructure and POD (storage tank and high service pump station in the vicinity of Cane Run Road/Greathouse Run Road) per the hydraulic conditions in Section 4B?

☒ Yes ☐ No See #5 on attached list of RFI questions

6. Are you willing to provide an allowance, recoverable through the rate structure, to fund infrastructure improvements (transmission and POD) serving GMWSS customers?

☒ Yes – estimated allowance: \$ ☐ No See #6 on attached list of RFI questions



Georgetown Municipal
Water and Sewer Service

7. **Would you be willing to enter a long-term agreement with GMWSS?** Indicate any legal limitations you may have related to the execution of a long-term water supply Agreement. *Check all that apply, circle preferred term.*
☒ Yes – 25 years ☐ Yes – 50 years ☐ Yes – 75 years ☐ Other – explain
With automatic renewal option
8. **Would you agree to an all-inclusive volumetric rate?**
☒ Yes ☐ No – explain See #8 on attached list of RFI questions.
9. **Describe the methodology for calculation for GMWSS future rate adjustments.**
See #9 on attached list of RFI questions.
10. **Would the rates charged to GMWSS under the proposed agreement be affected by the acquisition of other utilities by your organization?**
☒ No ☐ Yes – explain See #10 on attached list of RFI questions.
11. **Would finished water delivered at the POD require additional treatment by GMWSS to comply with the Safe Drinking Water Act or Kentucky standards?**
☒ No ☐ Yes – explain
12. **What disinfectant does your utility use for treatment of finished water?**
☒ Chloramines ☐ Free Chlorine
13. **Will Public Service Commission (PSC) oversight restrict your ability to enter into a long-term contract with guaranteed rates?**
☒ No ☐ Yes – explain See #13 on attached list of RFI questions.
14. **Provide any recommendations to GMWSS for improving affordability and reliability of the proposed wholesale water supply, including but not limited to constructability, contract type, rate structure, hydraulics, and operability.**
See #14 on attached list of RFI questions.

A handwritten signature in blue ink, appearing to read "Robert Burton".

Robert Burton, President
Signature of Authorized Representative

October 10, 2025
Date

RFI Response – Wholesale Water Supply - Appendix A Questions

1) Confirm whether your utility has the capacity to supply GMWSS's projected demands as described in Table 1 within its current infrastructure. If not, specify the maximum volume you could provide.

Yes

2) Confirm interest in and willingness to provide finished water to GMWSS on a wholesale basis.

Yes

3) Identify and describe your raw water sources.

Kentucky River Pool 9, Kentucky River Pool 3, Jacobson Reservoir

4) Indicate whether delivery of the contracted volume is subject to limitations on water availability, and if so, describe those limitations.

Yes. The only limitation to meeting the contracted volume of supply would be in the case of extreme regional drought conditions. Please note that the construction of KAW's Kentucky River Station #2 provided significant protection from drought conditions that could impact the region by providing multiple raw water supply points on the Kentucky River. Since the construction of KRS#2, KAW has not curtailed water supply service to its direct or wholesale customers. Additionally, during 2025 Kentucky River flooding events, KAW's operations were unaffected due to the strength and elevation of our raw water intakes, and KAW was able to supply additional water supply to other regional utilities during this event.

5) Confirm willingness to construct the necessary transmission and POD infrastructure in the vicinity of Cane Run Road and Greathouse Run/Frontage Road.

Yes. KAW is willing to construct the requested infrastructure. However, KAW's existing water system is capable of meeting the current and future GMWSS projected water supply needs through existing KAW infrastructure without the construction of an additional storage tank and pumping station with only a minor pipeline extension/connection to our 42-inch main along Iron Works Pike. In addition to the requested new connection, KAW has multiple other existing connections with GMWSS available to provide additional redundancy of supply. If KAW is the future successful bidder, the existing connections can be upgraded and/or modified, by KAW, as necessary to provide additional capacity and redundant supply. Given the strength and capacity of KAW's existing water system, this option provides the best value to GMWSS by providing multiple redundancies with little to no additional capital investment cost.

6) Are you willing to provide an allowance, recoverable through the rate structure, to fund infrastructure improvements (transmission and POD) serving GMWSS customers? If so, provide an estimated allowance.

Yes, KAW is willing to provide an allowance, recoverable through rates, to fund infrastructure improvements necessary to directly serve wholesale water supply to GMWSS. For example, these may include water mains and other infrastructure necessary to connect to the GMWSS system. Other infrastructure, that is deemed appropriate to enhance the redundancy and reliability of the surrounding KAW water system that also benefits existing KAW customers would be funded by KAW. As noted in Question #5 above, KAW already has significant local distribution capacity available to meet the current and future needs of GMWSS and can be leveraged by KAW to provide GMWSS with a wholesale supply option requiring less infrastructure development costs.

7) Confirm willingness to enter into a long-term agreement (25, 50 or 75 years) and indicate your preferred term. Indicate any legal limitations you may have related to the execution of a long-term water supply Agreement.

Yes. KAW suggests a 25-year term with automatic renewal options.

8) Confirm willingness to enter into an agreement based on all-inclusive volumetric rates. If not, describe your preferred rate structure, minimum purchase requirements, or up-front capital contributions.

Yes. Per our PSC approved tariff, KAW's rate structure would include monthly meter service charges for metering at interconnection point(s), plus a volumetric charge for water purchased. Due to the proposed

volume of wholesale water supply to GMWSS, KAW will negotiate a volume discounted volumetric rate inclusive of capital contributions, if needed. Again, please reference KAW's alternate proposed approach that mitigates the need for additional new infrastructure to serve GMWSS.

9) Describe your methodology for future rate adjustments.

KAW rates, including Sale for Resale, are reviewed and set by the Kentucky Public Service Commission periodically. In this case, the base meter charge(s) would be adjusted through future rate case applications. However, as noted in Question #8 above, the volumetric charge and future increases would be negotiated with a future sale for resale agreement between the parties.

10) Indicate whether the rates charged to GMWSS under the proposed agreement would be affected by the acquisition of other utilities by your organization.

See response to Question #9 above. The base meter charge can change during periodic rate case applications. Generally, as future acquisitions occur and customer base grows, our customer cost of service decreases. KAW envisions a volume discounted volumetric charge governed by a negotiated wholesale sale for resale agreement with GMWSS.

11) Indicate whether GMWSS would need to treat the finished water post-delivery to maintain compliance with the Safe Drinking Water Act or Commonwealth of Kentucky requirements. If so, explain.

No

12) Identify the residual disinfectant used by the WWS for treatment of finished water.

Chloramines

13) Indicate whether Public Service Commission (PSC) oversight would restrict your ability to enter into a long-term contract with guaranteed rates. If yes, explain.

No. Sale for Resale Agreements typically include a provision for how future rate increases could occur. Since that provision is understood and agreed to by both parties to the agreement from the beginning, the contractual obligation provides certainty for future rates. Final rates and rate structure would be subject to final contract negotiation.

14) Provide any recommendations to GMWSS for improving affordability and reliability of the proposed wholesale water supply, including but not limited to constructability, contract type, rate structure, hydraulics, and operability.

A more affordable solution would be to avoid the construction of costly infrastructure by utilizing KAW infrastructure that is already in place to provide the desired wholesale water service.

- The KAW system already serves 8,400 connections in Scott County, including Toyota, and surrounds the GMWSS system geographically.
- Multiple system interconnection points already exist between KAW and GMWSS.
- A far less expensive main extension project could connect GMWSS to our 42" main that lies in the vicinity of the proposed POD. Existing and potential solutions are shown on the attached maps. The solution proposed by GMWSS would increase rates for customers. The WWS customer would initially bear the cost of an estimated \$25M infrastructure project that would be given to GMWSS. GMWSS customers would also pay a higher wholesale water rate than necessary, by allowing the WWS to recover the cost of this infrastructure construction gradually over time through the wholesale water rate being charged.
- In keeping with the goal of affordable water service for everyone, this proposed alternative provides significant savings.

With regard to reliability, KAW can currently supply projected water needs within our existing treatment capacity.

- Our system has remained operable during all recent regional flooding events and droughts, when other regional water systems were placed on restrictions or had to be taken out of service.
- Our EPA compliance track record is outstanding with regard to water quality.
- Our treatment plants have continually won EPA Directors Awards for performance and optimization.

RFI Response – Wholesale Water Supply - Appendix A Questions

1) Confirm whether your utility has the capacity to supply GMWSS's projected demands as described in Table 1 within its current infrastructure. If not, specify the maximum volume you could provide.

Yes

2) Confirm interest in and willingness to provide finished water to GMWSS on a wholesale basis.

Yes

3) Identify and describe your raw water sources.

Kentucky River Pool 9, Kentucky River Pool 3, Jacobson Reservoir

4) Indicate whether delivery of the contracted volume is subject to limitations on water availability, and if so, describe those limitations.

Yes. The only limitation to meeting the contracted volume of supply would be in the case of extreme regional drought conditions. Please note that the construction of KAW's Kentucky River Station #2 provided significant protection from drought conditions that could impact the region by providing multiple raw water supply points on the Kentucky River. Since the construction of KRS#2, KAW has not curtailed water supply service to its direct or wholesale customers. Additionally, during 2025 Kentucky River flooding events, KAW's operations were unaffected due to the strength and elevation of our raw water intakes, and KAW was able to supply additional water supply to other regional utilities during this event.

5) Confirm willingness to construct the necessary transmission and POD infrastructure in the vicinity of Cane Run Road and Greathouse Run/Frontage Road.

Yes. KAW is willing to construct the requested infrastructure. However, KAW's existing water system is capable of meeting the current and future GMWSS projected water supply needs through existing KAW infrastructure without the construction of an additional storage tank and pumping station with only a minor pipeline extension/connection to our 42-inch main along Iron Works Pike. In addition to the requested new connection, KAW has multiple other existing connections with GMWSS available to provide additional redundancy of supply. If KAW is the future successful bidder, the existing connections can be upgraded and/or modified, by KAW, as necessary to provide additional capacity and redundant supply. Given the strength and capacity of KAW's existing water system, this option provides the best value to GMWSS by providing multiple redundancies with little to no additional capital investment cost.

6) Are you willing to provide an allowance, recoverable through the rate structure, to fund infrastructure improvements (transmission and POD) serving GMWSS customers? If so, provide an estimated allowance.

Yes, KAW is willing to provide an allowance, recoverable through rates, to fund infrastructure improvements necessary to directly serve wholesale water supply to GMWSS. For example, these may include water mains and other infrastructure necessary to connect to the GMWSS system. Other infrastructure, that is deemed appropriate to enhance the redundancy and reliability of the surrounding KAW water system that also benefits existing KAW customers would be funded by KAW. As noted in Question #5 above, KAW already has significant local distribution capacity available to meet the current and future needs of GMWSS and can be leveraged by KAW to provide GMWSS with a wholesale supply option requiring less infrastructure development costs.

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8) Confirm willingness to enter into an agreement based on all-inclusive volumetric rates. If not, describe your preferred rate structure, minimum purchase requirements, or up-front capital contributions.

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volume of wholesale water supply to GMWSS, KAW will negotiate a volume discounted volumetric rate inclusive of capital contributions, if needed. Again, please reference KAW's alternate proposed approach that mitigates the need for additional new infrastructure to serve GMWSS.

9) Describe your methodology for future rate adjustments.

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10) Indicate whether the rates charged to GMWSS under the proposed agreement would be affected by the acquisition of other utilities by your organization.

See response to Question #9 above. The base meter charge can change during periodic rate case applications. Generally, as future acquisitions occur and customer base grows, our customer cost of service decreases. KAW envisions a volume discounted volumetric charge governed by a negotiated wholesale sale for resale agreement with GMWSS.

11) Indicate whether GMWSS would need to treat the finished water post-delivery to maintain compliance with the Safe Drinking Water Act or Commonwealth of Kentucky requirements. If so, explain.

No

12) Identify the residual disinfectant used by the WWS for treatment of finished water.

Chloramines

13) Indicate whether Public Service Commission (PSC) oversight would restrict your ability to enter into a long-term contract with guaranteed rates. If yes, explain.

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- Our EPA compliance track record is outstanding with regard to water quality.
- Our treatment plants have continually won EPA Directors Awards for performance and optimization.



Georgetown Municipal Water and Sewer Service

August 26, 2026

Charlie Boland
Senior Manager, Business Development
Kentucky-American Water Company

RE: Long-Term Water Supply
Request for Proposal (RFP)

Dear Mr. Boland:

Pursuant to the RFP issued by Georgetown Municipal Water and Sewer Service (GMWSS) on October 17, 2025, GMWSS requests the following additional information related to Kentucky-American Water Company's (KAWC) proposal submitted November 21, 2025:

1. Marginal Cost of Service Analysis for KAWC's current water production and an embedded Cost of Service Analysis for the current rate via the existing KAWC connections.
2. Is KAWC required to implement capital improvements related to PFAs mitigation? If yes, what are the costs of those capital improvements and how would they impact rates and financial structure?
3. What are the anticipated costs of current or planned/anticipated capital improvement projects that would impact the applicable rate paid by GMWSS for the next 20 years?
4. Additional information and explanation related to Section 2, Question 2 in the proposal.
5. Feasibility and cost related an additional connection(s) with GMWSS from KAWC's 42-in transmission main in the vicinity of Leaning Oak Road, Caney Church Road, or Woodlake Road in Scott County, KY.
6. Willingness and ability of KAWC to negotiate a special rate contract (including terms and Cost of Service analyses supporting the proposed rates).
7. Regarding a Special Contract with KAWC, please provide the following:
 - a. Initial volumetric rates.
 - b. Rate certainty over the contract term, with preference for constant rates throughout the contract term. If rates are adjustable, please provide a defined rate-adjustment mechanism (such as a cap or index) that determines and limits future increases.
 - c. A firm capacity commitment, up to the full 15 MGD, with phasing aligned to GMWSS's demand growth outlined in the RFP.
 - d. Minimum-purchase terms that limit GMWSS's exposure, consistent with phasing.



Georgetown Municipal Water and Sewer Service

- e. Contracts (for reference/example) with other wholesale customers that have volumetric purchases, possibly with take or pay provisions, but also have capacity options that provide KAWC smaller, but defined payments for capacity headroom reservations and only commit GMWSS to the option costs, but no take or pay costs for higher demands. This would be an upside option, with the only risk to GMWSS being the recurring capacity option payments.
- f. Supporting marginal and embedded Cost of Service analyses for the proposed rate options.
- g. A defined contract term and renewal provisions.
- h. Clear allocation of capital and infrastructure costs, including any transmission or connection facilities, and non-contiguous distribution systems.
- i. A pathway and timeline for Public Service Commission approval of a Special Contract.

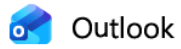
8. Whether KAWC would extend its proposal validity beyond the 12 months specified in the RFP.

Please submit this additional information by September 30, 2026 via email to cazevedo@gmwss.com.

Respectfully,

A handwritten signature in blue ink, appearing to read "Chase Azevedo", is written over a faint, larger blue signature.

Chase Azevedo, P.E.
General Manager



Request to connect

From Susan L Lancho <Susan.Lancho@amwater.com>

Date Mon 10/30/2023 9:33 AM

To Chase Azevedo <CAzevedo@gmwss.com>

Good morning, Chase. I hope you are doing well. I wanted to follow up on the voicemail message I left a few minutes ago. If you are able to call me back that would be great.

That said, my schedule today is fairly packed -- I should be able to take a call from between 10:30 and 11 and 1 until 2.

Tuesday is much better – anytime in the morning until 11 and after 2. Wednesday is fairly good, too.

I know you are busy, too. If you can give me a good time to call you back I'm happy to do that, as well.

Thanks for your time,

Susan Lancho

Senior Manager, External and Government Affairs
Kentucky American Water
2300 Richmond Road . Lexington, Kentucky 40502
O: 859-268-6332 M: 859-537-0736
susan.lancho@amwater.com



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RE: Meeting request

From Susan L Lancho <Susan.Lancho@amwater.com>
Date Fri 7/26/2024 4:13 PM
To Chase Azevedo <CAzevedo@gmwss.com>

Thanks, Chase. See you then.

Have a good weekend,

Susan

From: Chase Azevedo <CAzevedo@gmwss.com>
Sent: Friday, July 26, 2024 3:05 PM
To: Susan L Lancho <Susan.Lancho@amwater.com>
Subject: Re: Meeting request

EXTERNAL EMAIL: The Actual Sender of this email is CAzevedo@gmwss.com "Think before you click! ".

Works for me.

502-316-5651

From: Susan L Lancho <Susan.Lancho@amwater.com>
Sent: Friday, July 26, 2024 12:34 PM
To: Chase Azevedo <CAzevedo@gmwss.com>
Subject: RE: Meeting request

Sound great. How about Sedona on Newtown Pike, right off I-75? Would that work for you?

Also, before I forget ... my cell is 859-537-0736 if you need to reach me that day.

From: Chase Azevedo <CAzevedo@gmwss.com>
Sent: Friday, July 26, 2024 12:06 PM
To: Susan L Lancho <Susan.Lancho@amwater.com>
Subject: RE: Meeting request

EXTERNAL EMAIL: The Actual Sender of this email is CAzevedo@gmwss.com "Think before you click! ".

How about lunch at 1:00 on the 31st? You call the place!

Best,

Chase

From: Susan L Lancho <Susan.Lancho@amwater.com>
Sent: Tuesday, July 23, 2024 12:48 PM
To: Chase Azevedo <CAzevedo@gmwss.com>
Subject: RE: Meeting request

Thanks, Chase. Sounds good. Those days look really good for me! I am free after 12:30 on Wednesday, July 30, and after noon on July 31. (I have a meeting at 3 on July 31 but can work around that.)

Do either of those slots of time work for you, and where would it be best for us to meet? Our office is undergoing a major HVAC project right now so it isn't the most comfortable, but certainly we can meet wherever works best for you. Happy to meet for a late-ish lunch, too, if that would be helpful.

Thanks,

Susan

Susan Lancho

Senior Manager, External and Government Affairs
Kentucky American Water
2300 Richmond Road
Lexington, KY 40502
859.268.6332 (O) or 859.537.0736 (M)
susan.lancho@amwater.com

From: Chase Azevedo <CAzevedo@gmwss.com>
Sent: Monday, July 22, 2024 5:27 PM
To: Susan L Lancho <Susan.Lancho@amwater.com>
Subject: RE: Meeting request

EXTERNAL EMAIL: The Actual Sender of this email is CAzevedo@gmwss.com"Think before you click! ".

Hey Susan,

Thanks for reaching out!

I think a sit-down is a great idea. I suggest we start with just the two of us and then depending on that conversation, we can decide who else to loop into the mix. I know we both have a great deal going on so I'm sure there is no shortage to material for us to discuss.

I have some calendar openings on the 30th and 31st of this month. Do either of those days work for you?

Best,

Chase

From: Susan L Lancho <Susan.Lancho@amwater.com>
Sent: Monday, July 22, 2024 8:31 AM
To: Chase Azevedo <CAzevedo@gmwss.com>
Subject: Meeting request

Hi, Chase. I hope this finds you well.

I'm writing to see about scheduling a meeting -- to include some of our folks, you, and others at Georgetown Water as you deem appropriate -- for the purpose of making introductions (we have some new folks on our team) and discussing the current status of our treatment plants and water supply, touching base on our connection agreement, and any other topics that might be helpful to cover since we work in such close proximity in Scott County.

We appreciate you considering this request. If you are able to send some blocks of time that work best for you that would be great, and we'll go from there with setting up a meeting.

Thanks.

Susan Lancho
Senior Manager, External and Government Affairs
Kentucky American Water
2300 Richmond Road
Lexington, KY 40502
859.268.6332 (O) or 859.537.0736 (M)
susan.lancho@amwater.com



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RE: Request for Information - Wholesale Water Supply

From Chase Azevedo </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=84D0204991B3486B95DFD0CE903892A9-CAZEVEDO>
Date Fri 10/3/2025 12:37 PM
To Chase Azevedo <CAzevedo@gmwss.com>
Bcc

Please be advised:

The following question has been received by GMWSS related to the Wholesale Water Supply Request for Information:

- Question 6 - Are you asking how much the WWS is willing to pay for the construction of the transmission system which will be owned by the WWS **and** POD infrastructure which will be dedicated to GMWSS **or** how much the WWS is willing to pay for the construction of just the POD infrastructure?

Question No.6 refers to funding the cost of the infrastructure at the POD. GMWSS anticipates construction and implementation of transmission infrastructure to be paid for and owned by the WWS. GMWSS is asking whether the WWS is willing to fund the construction of the POD infrastructure, transfer the ownership to GMWSS, and have the costs repaid through the rate structure. Please indicate your response as follows: enter "All" in the estimated allowance spot if you plan to fund the full cost; enter a dollar amount if you plan to fund only a portion; or check "No" if you do not plan to contribute financially toward the POD.

This question and answer have been shared with all parties that received the Request for Information.

Respectfully submitted,

Chase Azevedo, PE

General Manager

Georgetown Municipal Water and Sewer Service
1000 West Main Street
Georgetown, KY 40324
502-863-7816

From: Chase Azevedo
Sent: Wednesday, October 1, 2025 2:09 PM
To: Chase Azevedo <CAzevedo@gmwss.com >
Subject: Request for Information - Wholesale Water Supply

Please be advised:

The following questions have been received by GMWSS related to the Wholesale Water Supply Request for Information:

- Question 1 – Does this question refer to current treatment capacity or transmission capacity to the point of delivery?

Question No. 1 refers to current treatment capacity within existing facilities.

- Question 1 – Which demand projection for Table 1 do you want us to use to answer the question (e.g. 7.50 MGD, 11.25 MGD, 15.0 MGD or other)?

■ 2045 = 10.0 MGD Average Day Demand, 15 MGD Maximum Day Demand

- Question 6 – For clarification, can you explain what you mean by “. . .allowance, recoverable through the rate structure . . .”?

GMWSS anticipates construction and implementation of transmission and point of delivery infrastructure by the WWS including a 5 MG ground storage tank and high service pump station. Point of delivery infrastructure will be dedicated to GMWSS with cost of the infrastructure recovered by the WWS through the rate structure. GMWSS will provide planning level information (preliminary design and planning level opinion of cost) related to anticipated point of delivery infrastructure in the Request for Proposals.

- Question 6 - What is the ground elevation and overflow of the 5 MG POD tank and what size pump station do you want to construct initially?

- Ground Elevation = 874.00
- Overflow Elevation = 900.00 (+/-)
- Pump Station Size = 5 MGD Average Day Demand, 7.5 MGD Maximum Day Demand, expandable to 15.0 MGD.

These questions and answers have been shared with all parties that received the Request for Information.

Respectfully submitted,

Chase Azevedo, PE

General Manager

Georgetown Municipal Water and Sewer Service

1000 West Main Street

Georgetown, KY 40324

502-863-7816



Re: RFI Response - Wholesale Water Supply - Kentucky American Water

From Charles E Boland <Charles.Boland@amwater.com>
Date Mon 10/13/2025 5:28 PM
To Chase Azevedo <CAzevedo@gmwss.com>

Thanks Chase, appreciate the confirmation and we look forward to the RFP process.

Charlie Boland

From: Chase Azevedo <CAzevedo@gmwss.com >
Sent: Monday, October 13, 2025 5:24 PM
To: Charles E Boland <Charles.Boland@amwater.com >
Subject: RE: RFI Response - Wholesale Water Supply - Kentucky American Water

Charles,

We did receive your response. Thank you for your interest and effort on this work. We intend to issue the RFP this Friday.

Best,

Chase

From: Charles E Boland <Charles.Boland@amwater.com >
Sent: Monday, October 13, 2025 5:23 PM
To: Chase Azevedo <CAzevedo@gmwss.com >
Subject: Re: RFI Response - Wholesale Water Supply - Kentucky American Water

Good afternoon, I just wanted to confirm that you received my email Friday regarding the RFI for wholesale water...thanks!

Charlie Boland

From: Charles E Boland <Charles.Boland@amwater.com>
Sent: Friday, October 10, 2025 12:38 PM
To: cazevedo@gmwss.com<cazevedo@gmwss.com>
Subject: RFI Response - Wholesale Water Supply - Kentucky American Water

Good day, Mr. Azevedo,

Thank you for the opportunity to provide a response to GMWSS's RFI for Wholesale Water Supply. Please find Kentucky American Water's response attached. It includes a cover letter, the Appendix A Form, and a supplemental document to give more detail on the responses to questions. Please confirm receipt of the email.

If helpful, we can also provide 2-3 maps regarding our proposal but wanted to stay within the maximum length specified by the RFI instructions.

Thanks, again, and please let me know if you need any further information or would like me to provide the maps. Have a great weekend.

Charlie Boland

Sr. Mgr. Business Development

Kentucky American Water

(859) 537-0759

charles.boland@amwater.com

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Re: Request for Proposals - Wholesale Water Supply

From Charles E Boland <Charles.Boland@amwater.com>
Date Tue 11/11/2025 2:05 PM
To Chase Azevedo <CAzevedo@gmwss.com>

Good afternoon, Chase - one additional question if you could add it to the list - thanks!

Section 10, Scoring of Proposals, states "GMWSS will evaluate, score and rank all proposals in the best interest of the utility." Can you please identify the ranking, evaluation or scoring metrics or criteria that will be utilized by GMWSS when evaluating bids?

Charlie Boland

From: Charles E Boland <Charles.Boland@amwater.com >
Sent: Monday, November 10, 2025 8:48 AM
To: Chase Azevedo <CAzevedo@gmwss.com >
Subject: Re: Request for Proposals - Wholesale Water Supply

Good morning, Chase - here is one question for you. If anything further, I will get those to you by Wednesday...thanks

Does Georgetown Municipal Water and Sewer Service need providers to deliver the projected ADD and MDD demands shown on page 3, table 1 of the RFP (e.g. maximum day demands of 7.65-9.2 MGD by 2030 and 8.7-10.88 MGD by 2035) or merely the difference between those values and Georgetown's existing demand of 3.9 – 4.5 million gallons / day?

Charlie Boland

From: Chase Azevedo <CAzevedo@gmwss.com >
Sent: Sunday, November 9, 2025 2:31 PM
To: Charles E Boland <Charles.Boland@amwater.com >
Subject: RE: Request for Proposals - Wholesale Water Supply

Thanks Charles. No worries. Looking forward to seeing your questions and response.

Chase Azevedo, PE

General Manager

Georgetown Municipal Water and Sewer Service

1000 West Main Street

Georgetown, KY 40324

502-863-7816

From: Charles E Boland <Charles.Boland@amwater.com >
Sent: Friday, November 7, 2025 2:55 PM
To: Chase Azevedo <CAzevedo@gmwss.com >
Subject: Re: Request for Proposals - Wholesale Water Supply

Good afternoon, Chase, I hope you are doing well. I just noticed that you had requested a reply back confirming receipt of your email and the RFP, so I am doing that belatedly. Thanks, and we do intend to submit a proposal. I will have any questions to you by the November 12 deadline.

Have a good weekend

Charlie Boland

Sr. Mgr. Business Development

Kentucky American Water

(859) 537-0759

charles.boland@amwater.com

From: Chase Azevedo <CAzevedo@gmwss.com>
Sent: Friday, October 17, 2025 11:41 AM
To: Chase Azevedo <CAzevedo@gmwss.com>
Subject: Request for Proposals - Wholesale Water Supply

All,

Please see the attached Request for Proposals (RFP) related to Wholesale Water Supply for Georgetown Municipal Water and Sewer Service.

Please confirm receipt of this email and RFP via email response.

Respectfully,

Chase Azevedo, PE

General Manager

Georgetown Municipal Water and Sewer Service

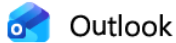
1000 West Main Street

Georgetown, KY 40324

502-863-7816

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RFP Response - Wholesale Water Supply - Kentucky American Water

From Charles E Boland <Charles.Boland@amwater.com>

Date Fri 11/21/2025 2:09 PM

To Chase Azevedo <CAzevedo@gmwss.com>

 4 attachments (3 MB)

GMWSS RFP Response Sheet - Final.docx; GMWSS RFP Appendix A - WWS 2025-10-17.docx; GMWSS RFP Appendix B - WWS 2025-10-17.docx; GMWSS RFP Cover Letter - Final.docx;

Hi Chase, please find attached our response to the wholesale water RFP. Thank you and please advise if any questions!

Charlie Boland

Sr. Mgr. Business Development

Kentucky American Water

(859) 537-0759

charles.boland@amwater.com



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Request

4. Refer to the Azevedo Direct Testimony, page 3, lines 20-23, and pages 11-12.
 - a. State whether Georgetown Water and Sewer is considering expanding, replacing, or otherwise modifying the Royal Spring Water Treatment Plant to increase its capacity beyond 4.0 MGD within the next five years.
 - b. If so, describe the proposed project; anticipated capacity, schedule, and cost; funding sources; required approvals; status of engineering or planning studies; and expected effect on future purchased-water requirements.
 - c. If not, explain whether Georgetown Water and Sewer's long-term supply planning assumes that the plant will remain limited to 4.0 MGD.
-

Response

- a. Meeting federal PFAS mitigation mandates will involve a major capital improvement project at the Royal Spring water treatment plant and GMWSS will look at options to possibly increase capacity and withdrawal from the Spring in conjunction with the PFAS mitigation work.

On the other hand, the 2022 Water Source Assessment (see response to 1 PSC 06) noted concerns about continued use of Royal Spring as a water source (p.22) and included in its recommendations that the Royal Spring water treatment plant operate at a reduced capacity of 2.5 MGD (by operating 16 hours rather than 24 hours per day), to complete needed maintenance and other activities and to have the flexibility to meet peak demands if needed, until the plant could be taken out of service in 2028 (see p.52).
- b. GMWSS does not have a proposed project scheduled. The PFAS mitigation deadline is currently in 2029, although there is provision for possible extension of the deadline to 2031. It is not on a schedule to take the plant out of service in 2028.

- c. GMWSS long-term supply planning includes scenarios in which the Royal Spring plant will remain at 4.0 MGD capacity, as well as those in which it operates at reduced capacity or is taken out of service (as recommended in the 2022 Water Source Assessment) or even that a new plant is built. GMWSS continues to evaluate all options for long-term water supply including, but not limited to, expansion of the Royal Spring water treatment plant, water supply partnerships, water reuse, etc.

Request

5. Refer to the Azevedo Direct Testimony, page 9, lines 17-23; page 10, lines 3-14; and page 11, lines 6-12.
 - a. Reconcile Georgetown Water and Sewer's recorded usage of 51,409,317 gallons with the 51,413,900 gallons reflected on Kentucky-American's corrected bill.
 - b. State whether the June 15, 2026 corrected bill fully resolved all disputed billing and provide a schedule of all amounts billed, credited, and paid for Champion Way service during fiscal year 2026 (FY26), separately identifying usage charges, monthly service charges, taxes, and surcharges.
 - c. Identify the FY26 budgeted and actual amounts for Kentucky-American purchases and provide the calculation supporting the statement that expenditures equaled 137 percent of the budgeted amount.
-

Response

- a. GMWSS personnel read the meter on February 5, 2026 (at 3,348,747), and March 10, 2026 (at 54,758,064), which encompassed the period of time the Royal Spring treatment plant was off-line.
 - KAWC billed for usage from February 4, 2026; the bills show an actual read that date of 3,344,500 (rounded to a hundred), lower than the GMWSS 2/5/26 read by 4,247 gallons.
 - KAWC's next actual read of the meter was on June 12, 2026, and was described by KAWC as confirming "a digital reading" at an unspecified date. See KAWC 7/10/30 response to 1 GMWSS 13.a-b. A read of 54,758,400 (rounded to a hundred) was attributed to May 19, 2026, on the corrected invoice for bills from 2/4/26–5/19/26, higher than the GMWSS 3/10/26 read by 336 gallons.

See KAWC corrected bill dated June 15, 2026 (attached as 01-0109). The KAWC reads were 1-2 days before and 2-3 months after the GMWSS start and ending reads, and are

consistent with being over a longer period of time and unintended flow of water into the GMWSS system while the KAWC meter was in place.

- b. GMWSS had not disputed KAWC's invoices to it for the Champion Way account during February–May 2026, but was concerned about the incorrect, low estimated amounts on the invoices. The usage shown on the KAWC corrected bill dated June 15, 2026, is close enough to GMWSS reads of the meter that GMWSS does not dispute the amount billed. GMWSS does not routinely keep track of KAWC bill components, but has endeavored to put together a schedule of KAWC bills on the Champion Way account paid by GMWSS in FY26. GMWSS has paid to KAWC the total period charges shown on the schedule. The schedule, attached as 01-0101, does not include any bills received for service after May 19, 2026 (the corrected bill service period end date) but before the 6/30/26 end of FY26. Also attached hereto (as 01-0102 to 01-0108) are the KAWC bills for service at the Champion Way interconnection during July-December 2025 and February-May 19, 2026, including the corrected, true-up bill dated June 15, 2026. See also the response to 1 PSC 02.a for data re KAWC billing for service since January 1, 2021, through August 19, 2026.
- c. The following presents FY26 budgeted and paid amounts for charges by KAWC for wholesale-related service and calculation showing that GMWSS payments were 137% over budget:

Description		\$\$
Total FY26 Budget GMWSS Wholesale Water - KAWC	\$	348,315
KAWC Charges*	\$	463,752
KAWC Burton Rd. Meter Charges**	+ \$	14,052
Total FY26 KAWC Charges Paid	\$	477,804
Amount over FY26 Budget (payments-budget)	\$	129,489

Percentage Amount Over FY26 Budget

(overage amount / budget amount = \$348,315/\$129,489) **37.2%**

* See FY26 payments schedule, attached as 01-0101.

** These FY26 payments to KAWC are for a meter and the facilities to receive wholesale water at the Burton Road service location. No water was received/purchased at that location during FY26 (and for a very long time). The KAWC charges are for service (a function of the meter size) — not for usage — and all the ancillary service-related charges, taxes, and fees that KAWC bills.

	A	B	C	D	E	F	G	H	I	J
1	Georgetown Municipal Water & Sewer Service									
2	Detail of KAWC charges - Champion Way									
3	For Period: Fiscal Year 2026 (7/1/25-6/30/26)									
4									Reversal of	Rebill of
5		Actual Bill	Actual Bill	Actual Bill	Estimated Bill	Estimated Bill	Estimated Bill	Estimated Bill	Est Billings	Actuals
6	Purchase Dates	9/16-10/20/25	10/21-11/19/25	11/20-11/30/25	2/04-2/18/26	2/19-3/18/26	3/19-4/20/26	4/21-5/19/26		2/04-5/19/26
7	Purchase Gallons	454,900	1,944,300	5,200	158,200	295,300	348,000	305,900		51,413,900
8	Fees & Adjustments									
9	Service Activation Fee	\$ 28.00			\$ 28.00				\$ (28.00)	\$ 28.00
10	Courtesy Adjustment			\$ (21.03)						
11	Service Related Charges									
12	Water Service Charge	\$ 873.00	\$ 873.00	\$ 315.72	\$ 487.92	\$ 989.40	\$ 989.40	\$ 989.40	\$ (3,456.12)	\$ 3,456.12
13	Water Usage Charge	\$ 2,252.98	\$ 9,629.53	\$ 25.75	\$ 1,314.50	\$ 2,453.68	\$ 2,891.57	\$ 2,541.75	\$ (9,201.50)	\$ 427,203.24
14	Other Charges									
15	QIP Surcharge Water	\$ 346.67	\$ 1,164.73	\$ 37.87						
16	Georgetown Hydrant Fee	\$ 3.59	\$ 3.59	\$ 1.30	\$ 1.77	\$ 3.59	\$ 3.59	\$ 3.59	\$ (12.54)	\$ 12.54
17	KRA Withdrawal Fee	\$ 143.75	\$ 614.40	\$ 1.64	\$ 49.99	\$ 93.31	\$ 103.33	\$ 87.49	\$ (334.12)	\$ 16,246.79
18	Taxes									
19	School District Tax	\$ 4.42	\$ 18.54	\$ 0.09	\$ 1.55	\$ 2.91		\$ 2.73	\$ (7.19)	\$ 487.78
20										
21	Total Period Charges	\$ 3,652.41	\$ 12,303.79	\$ 361.34	\$ 1,883.73	\$ 3,542.89	\$ 3,987.89	\$ 3,624.96	\$ (13,039.47)	\$ 447,434.47
22										\$ 434,395.00
23										
24	** Columns I & J reflect one billing dated June 15, 2026. The net total of that billing is reflected in cell J20. Columns B-H above each reflect one billed invoice.									



Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
	100 gal	6"	09/16/2025	10/20/2025	9,400 (A)	13,949 (E)	4,549	4,549.00	454,900

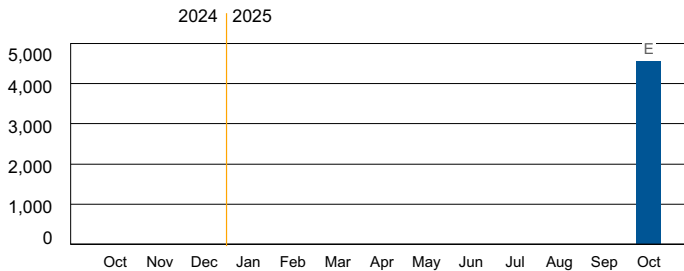
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 454,900

Billed Usage History (graph shown in 100 gallons)

- 454,900 gallons = usage for this period
- 0 gallons = usage for same period last year



E = Estimate

Next Scheduled Read Date: on or about November 19, 2025
Account Type: Sale for Resale

Average
daily use for
this period is:
(35 days)

12,997
gallons

Year to Date Billed Usage: 454,900 gallons

Account Detail

Account No. [REDACTED]

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing	3,675.73
Payments	-3,675.73
Total payments as of Dec 16. Thank you!	-3,675.73
Balance Forward	0.00
Fees and Adjustments	28.00
Service Activation Fee	28.00
Service Related Charges - 09/16/25 to 10/20/25	
Water Service	3,125.98
Water Service Charge	873.00
Water Usage Charge (4,549 x \$0.49527)	2,252.98
Other Charges	494.01
QIP Surcharge Water (\$3,125.98 x 11.09%)	346.67
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (4,549 x \$0.0316)	143.75
Total Service Related Charges	3,619.99
Taxes	4.42
School District Tax (\$147.34 x 3.000%)	4.42
Total Current Period Charges	3,652.41

Total Amount Due

**\$3,652.41**

Understanding Your Bill

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For more information about your charges and rates, please visit:
<https://amwater.com/kyaw/rates>



Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
	100 gal	6"	10/21/2025	11/19/2025	13,949 (E)	33,392 (A)	19,443	19,443.00	1,944,300

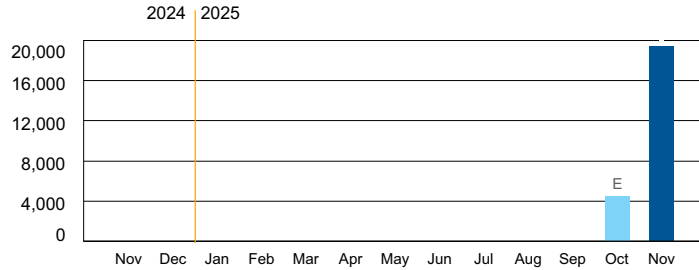
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 1,944,300

Billed Usage History (graph shown in 100 gallons)

- 1,944,300 gallons = usage for this period
- 0 gallons = usage for same period last year



E = Estimate

Next Scheduled Read Date: on or about December 18, 2025
Account Type: Sale for Resale

Average
daily use for
this period is:
(30 days)

64,810
gallons

Year to Date Billed Usage: 2,399,200 gallons

Account Detail

Account No. [REDACTED]

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing 3,652.41

Payments -3,652.41

Total payments as of Nov 12. Thank you! -3,652.41

Balance Forward 0.00

Service Related Charges - 10/21/25 to 11/19/25

Water Service		10,502.53
Water Service Charge		873.00
Water Usage Charge	(19,443 x \$0.49527)	9,629.53

Other Charges		1,782.72
QIP Surcharge Water	(\$10,502.53 x 11.09%)	1,164.73
Georgetown Hydrant Fee	(1 x \$3.59)	3.59
KRA Withdrawal Fee	(19,443 x \$0.0316)	614.40

Total Service Related Charges 12,285.25

Taxes		18.54
School District Tax	(\$617.99 x 3.000%)	18.54

Total Current Period Charges 12,303.79

Total Amount Due ➡ **\$12,303.79**

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Meter Reading and Usage Summary

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	100 gal	6"	11/20/2025	11/30/2025	33,392 (A)	33,444 (A)	52	52.00	5,200

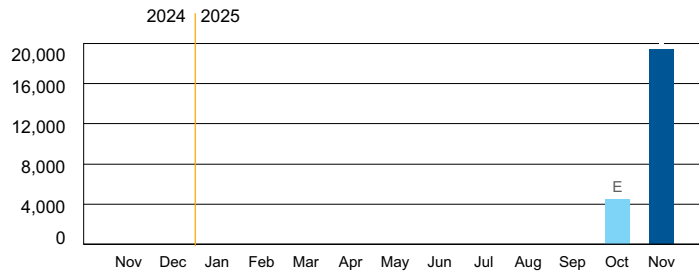
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 5,200

Billed Usage History (graph shown in 100 gallons)

- 5,200 gallons = usage for this period
- 0 gallons = usage for same period last year



E = Estimate

Account Type:

Sale for Resale

Average
daily use for
this period is:
(11 days)

473
gallons

Year to Date Billed Usage: 2,404,400 gallons

Account Detail

Account No. [REDACTED]

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing	12,303.79
Payments	-12,303.79
Total payments as of Dec 12. Thank you!	-12,303.79
Balance Forward	0.00
Fees and Adjustments	-21.03
Courtesy Adjustment	-21.03
Service Related Charges - 11/20/25 to 11/30/25	
Water Service	341.47
Water Service Charge	315.72
Water Usage Charge (52 x \$0.49527)	25.75
Other Charges	40.81
QIP Surcharge Water (\$341.47 x 11.09%)	37.87
Georgetown Hydrant Fee (1 x \$3.59)	1.30
KRA Withdrawal Fee (52 x \$0.0316)	1.64
Total Service Related Charges	382.28
Taxes	0.09
School District Tax (\$2.94 x 3.000%)	0.09
Total Current Period Charges	361.34

Total Amount Due**\$361.34**

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Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
	100 gal	6"	02/04/2026	02/18/2026	33,445 (A)	35,027 (E)	1,582	1,582.00	158,200

A = Actual E = Estimate

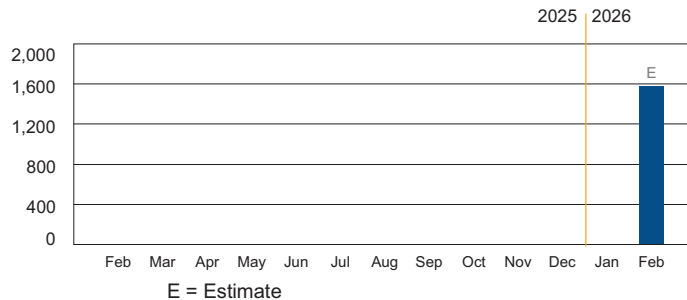
1 Billing Unit = 100 gallons

Total Gallons:

158,200

Billed Usage History (graph shown in 100 gallons)

- 158,200 gallons = usage for this period
- 0 gallons = usage for same period last year



Next Scheduled Read Date: on or about March 18, 2026
Account Type: Sale for Resale

Average
daily use for
this period is:
(15 days)

10,547
gallons

Year to Date Billed Usage: 158,200 gallons

Account Detail

Account No.

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing	361.34
Payments	-361.34
Total payments as of Jan 20. Thank you!	-361.34
Balance Forward	0.00
Fees and Adjustments	28.00
Service Activation Fee	28.00
Service Related Charges - 02/04/26 to 02/18/26	
Water Service	1,802.42
Water Service Charge	487.92
Water Usage Charge (1,582 x \$0.83091)	1,314.50
Other Charges	51.76
Georgetown Hydrant Fee (1 x \$3.59)	1.77
KRA Withdrawal Fee (1,582 x \$0.0316)	49.99
Total Service Related Charges	1,854.18
Taxes	1.55
School District Tax (\$51.76 x 3.000%)	1.55
Total Current Period Charges	1,883.73

Total Amount Due

**\$1,883.73**

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Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
	100 gal	6"	02/19/2026	03/18/2026	35,027 (E)	37,980 (E)	2,953	2,953.00	295,300

A = Actual E = Estimate

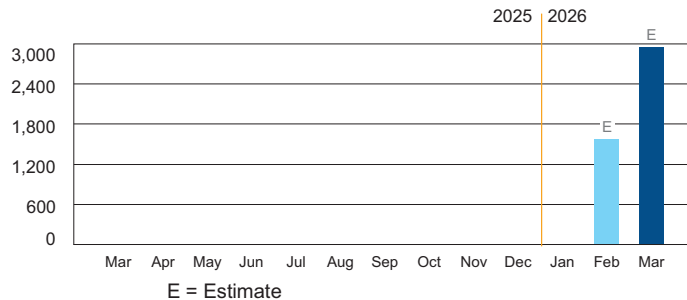
1 Billing Unit = 100 gallons

Total Gallons:

295,300

Billed Usage History (graph shown in 100 gallons)

- 295,300 gallons = usage for this period
- 0 gallons = usage for same period last year



Next Scheduled Read Date: on or about April 20, 2026
Account Type: Sale for Resale

Average
daily use for
this period is:
(28 days)

10,546
gallons

Year to Date Billed Usage: 453,500 gallons

Account Detail

Account No. [REDACTED]

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing	1,883.73
Payments	-1,883.73
Total payments as of Mar 3. Thank you!	-1,883.73
Balance Forward	0.00
Service Related Charges - 02/19/26 to 03/18/26	
Water Service	3,443.08
Water Service Charge	989.40
Water Usage Charge (2,953 x \$0.83091)	2,453.68
Other Charges	96.90
Georgetown Hydrant Fee (1 x \$3.59)	3.59
KRA Withdrawal Fee (2,953 x \$0.0316)	93.31
Total Service Related Charges	3,539.98
Taxes	2.91
School District Tax (\$96.90 x 3.000%)	2.91
Total Current Period Charges	3,542.89

Total Amount Due

**\$3,542.89**

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Para obtener asistencia con la traducción de su factura, comuníquese con nuestro Centro de Servicio al Cliente, de lunes a viernes de 7 a.m. a 7 p.m.

For more information about your charges and rates, please visit:
<https://amwater.com/kyaw/rates>



Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
	100 gal	6"	03/19/2026	04/20/2026	37,980 (E)	41,460 (E)	3,480	3,480.00	348,000

A = Actual E = Estimate

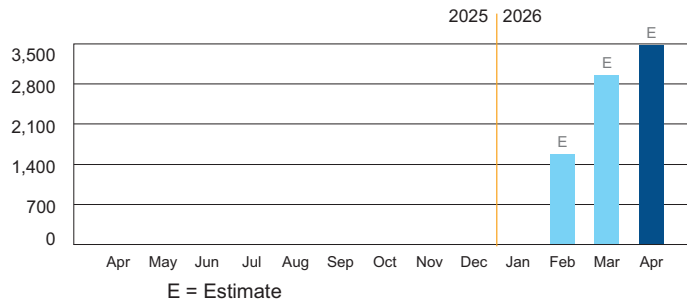
1 Billing Unit = 100 gallons

Total Gallons:

348,000

Billed Usage History (graph shown in 100 gallons)

- 348,000 gallons = usage for this period
- 0 gallons = usage for same period last year



Next Scheduled Read Date: on or about May 19, 2026
Account Type: Sale for Resale

Average
daily use for
this period is:
(33 days)

10,545
gallons

Year to Date Billed Usage: 801,500 gallons

Account Detail

Account No. [REDACTED]

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing 3,542.89

Payments 0.00

Balance Forward 3,542.89

Service Related Charges - 03/19/26 to 04/20/26

Water Service 3,880.97

Water Service Charge 989.40

Water Usage Charge (3,480 x \$0.83091) 2,891.57

Other Charges 106.92

Georgetown Hydrant Fee (1 x \$3.59) 3.59

KRA Withdrawal Fee

03/19/26 to 03/30/26 (1,265.45 x \$0.0316) 39.99

03/31/26 to 04/20/26 (2,214.55 x \$0.0286) 63.34

Total Service Related Charges 3,987.89

Total Current Period Charges 3,987.89

Total Amount Due



\$7,530.78

Understanding Your Bill

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For more information about your charges and rates, please visit:
<https://amwater.com/kyaw/rates>



Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
	100 gal	6"	04/21/2026	05/19/2026	41,460 (E)	44,519 (E)	3,059	3,059.00	305,900

A = Actual E = Estimate

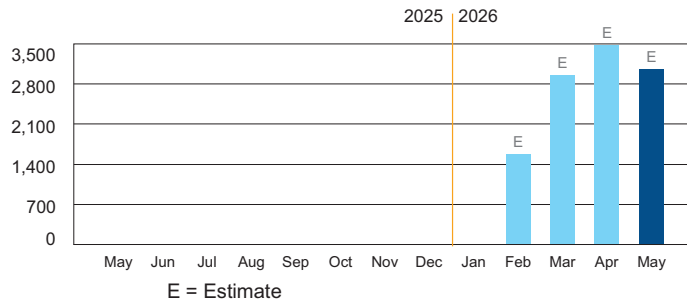
1 Billing Unit = 100 gallons

Total Gallons:

305,900

Billed Usage History (graph shown in 100 gallons)

- 305,900 gallons = usage for this period
- 0 gallons = usage for same period last year



Next Scheduled Read Date: on or about June 17, 2026
Account Type: Sale for Resale

Average
daily use for
this period is:
(29 days)

10,548
gallons

Year to Date Billed Usage: 1,107,400 gallons

Account Detail

Account No. [REDACTED]

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing 7,530.78

Payments -11,073.67

Total payments as of May 12. Thank you! -11,073.67

Balance Forward -3,542.89

Service Related Charges - 04/21/26 to 05/19/26

Water Service 3,531.15

Water Service Charge 989.40

Water Usage Charge (3,059 x \$0.83091) 2,541.75

Other Charges 91.08

Georgetown Hydrant Fee (1 x \$3.59) 3.59

KRA Withdrawal Fee (3,059 x \$0.0286) 87.49

Total Service Related Charges 3,622.23

Taxes 2.73

School District Tax (\$91.08 x 3.000%) 2.73

Total Current Period Charges 3,624.96

Total Amount Due  **\$82.07**

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<https://amwater.com/kyaw/rates>



WE KEEP LIFE FLOWING™

Service Address:

GEORGETOWN WATER & SEWER SERVICE
CHAMPION WAY
GEORGETOWN, KY 40324

THANK YOU FOR BEING OUR CUSTOMER

Important Account Messages

- Your charges contain a change in pricing that was effective on 03/31/26. Please review the Account Detail section of your bill for more information.
- This bill reflects an extended or partial billing period. As a result, a portion of your charges may be prorated accordingly to represent actual days of service received. Please refer to Account Detail for more information.

For more information, visit www.kentuckyamwater.com



View your account information or pay your bill anytime at: www.amwater.com/MyAccount



Pay by Phone*: Pay anytime at 1-855-748-8068
*A convenience fee may apply



Customer Service: 1-800-876-6301
M-F 7:00am to 7:00pm - Emergencies 24/7



In Person: We have agreements with several authorized payment locations in our service areas. See the reverse side for more information.



KENTUCKY AMERICAN WATER
PO BOX 6029
CAROL STREAM, IL 60197-6029

Statement

001050

Page 1 of 5
100004589330

Account No. [REDACTED]

Total Amount Due:	\$434,395.00
Payment Due By:	July 1, 2026

Billing Date: June 15, 2026
Service Period: Feb 04 to May 19 (105 Days)
Total Gallons: 51,413,900

Account Summary – See page 3 for Account Detail

Prior Billing:	\$361.34
Payments - Thank You!	\$13,400.81
Balance Forward:	\$13,039.47
Fees and Adjustments:	\$28.00
Service Related Charges:	\$446,918.69
Taxes:	\$487.78
Total Amount Due:	\$434,395.00

01.23.585.10

Please return bottom portion with your payment. DO NOT send cash. Retain upper portion for your records.



Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
	100 gal	6"	02/04/2026	05/19/2026	33,446 (A)	547,584 (A)	514,139	514,139.00	51,413,900

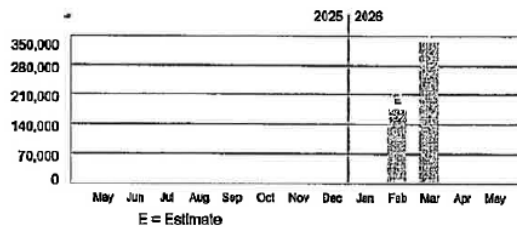
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 51,413,900

Billed Usage History (graph shown in 100 gallons)

- ☒ 51,413,900 gallons = usage for this period
☐ 0 gallons = usage for same period last year

Next Scheduled Read Date: on or about June 17, 2026
Account Type: Sale for ResaleAverage
daily use for
this period is:
(105 days)489,656
gallons

Year to Date Billed Usage: 51,413,900 gallons

Account Detail

Account No. [REDACTED]

Service To: CHAMPION WAY GEORGETOWN, KY 40324

Prior Billing	361.34
Payments	-13,400.81
Total payments as of Jun 12. Thank you!	-13,400.81
Balance Forward	-13,039.47
Cancellation of Prior Billing	-13,011.47
Cancelled Bill Period 02/04/2026 - 02/18/2026	-1,855.73
Reason: Under Estimated Meter Reading	
Cancelled Bill Period 02/19/2026 - 03/18/2026	-3,542.69
Reason: Under Estimated Meter Reading	
Cancelled Bill Period 03/19/2026 - 04/20/2026	-3,987.69
Reason: Under Estimated Meter Reading	
Cancelled Bill Period 04/21/2026 - 05/19/2026	-3,624.96
Reason: Under Estimated Meter Reading	
Fees and Adjustments	29.00
Service Activation Fee	28.00
Service Related Charges - 02/04/26 to 05/19/26	
Rebill - 02/04/26 to 02/18/26	
Water Service	149,510.80
Water Service Charge	487.62
Water Usage Charge (179,349 x \$0.63091)	149,022.68
Other Charges	5,689.20
Georgetown Hydrant Fee (1 x \$3.50)	1.77
KRA Withdrawal Fee (179,349 x \$0.0316)	5,687.43
Rebill - 02/19/26 to 03/18/26	

(Continued on next page)

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Para obtener asistencia con la traducción de su factura, comuníquese con nuestro Centro de Servicio al Cliente, de lunes a viernes de 7 a.m. a 7 p.m.

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<https://emwater.com/kyaw/rates>



Water Service		279,166.44
Water Service Charge		989.40
Water Usage Charge	(334,786 x \$0.83091)	278,177.04
Other Charges		10,582.83
Georgetown Hydrant Fee	(1 x \$3.59)	3.59
KRA Withdrawal Fee	(334,786 x \$0.0316)	10,579.24
Rebill - 03/19/26 to 04/20/26		
Water Service		991.06
Water Service Charge		989.40
Water Usage Charge	(2 x \$0.83091)	1.66
Other Charges		3.85
Georgetown Hydrant Fee	(1 x \$3.59)	3.59
KRA Withdrawal Fee		
03/19/26 to 03/30/26	(0.72 x \$0.0316)	0.02
03/31/26 to 04/20/26	(1.28 x \$0.0286)	0.04
Rebill - 04/21/26 to 05/19/26		
Water Service		991.06
Water Service Charge		989.40
Water Usage Charge	(2 x \$0.83091)	1.66
Other Charges		3.85
Georgetown Hydrant Fee	(1 x \$3.59)	3.59
KRA Withdrawal Fee	(2 x \$0.0286)	0.06
Total Service Related Charges		446,918.69
Taxes		487.78
School District Tax	(\$16,259.33 x 3.000%)	487.78
Total Current Period Charges		447,434.47
Total Amount Due		\$434,395.00

Request

6. Refer to the Azevedo Direct Testimony, page 11, lines 18-23, and page 12, lines 1-5.
 - a. Provide the 2022 Water Source Assessment and all workpapers supporting the projected average-day and maximum-day demands.
 - b. Identify the principal assumptions used in developing the projections and state whether the projections have been updated since 2022. If so, provide the updated projections and all supporting workpapers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.
-

Response

- a. Not attached, but filed concurrently herewith is the *2022 Water Source Assessment*, prepared by GRW Engineers (Lexington, KY) for GMWSS dated December 2022, and marked as a DRAFT COPY. This is the latest version that GMWSS has, and this version has been made public (for example, in response to Open Records Act requests). The support for the projected average day demand (ADD) and maximum-day demand (MDD) is contained within the Assessment. See esp. pp.1-4 (Assessment Approach), pp.6-7 (Assessment Criteria and Methodology), and pp.14-18 (Water Demand Projections).
- b. The 2022 Water Source Assessment does not list its assumptions or identify its principal assumptions.
 - The projections are developed and their bases given for ADD at pp.14-16 and for MDD at pp.17-18.
 - The development of water-source alternatives — including Alternatives C1 and C2 with KAWC as the water supplier — and the projected costs for each scenario

are described at pp.19-35, analyzed at pp.36-52, and present worth cost
information and calculations are given in Appendix B (at pp.61-139).

The projections of ADD and MDD have not been updated since 2022.

Request

7. Refer to the Azevedo Direct Testimony, page 13, lines 10-12.
 - a. Explain the factual basis for Mr. Azevedo's statement that Kentucky-American incurs little fixed cost in serving Georgetown Water and Sewer at the Champion Way interconnection and that the service is incidental to Kentucky-American's end-use service.
 - b. Identify the Kentucky-American facilities, costs, studies, data, and other information considered in reaching that conclusion and provide all supporting analyses and workpapers.
-

Response

- a. The factual basis for the cited Azevedo direct testimony is as follows:

KAWC has not planned, reserved or maintained production capacity to serve GMWSS with wholesale water. The only agreement GMWSS has had in recent history with KAWC for Sales for Resale service is the 1999 Emergency Connection Agreement, that KAWC provided in response to GMWSS's initial data request no. 12 (also attached to the GMWSS response to 1 PSC 06). That Agreement was entered into and the interconnection installed after KAWC's Kentucky River Station I and Richmond Road treatment facilities were initially placed into service. When granting KAWC a CPCN in 2008 for Kentucky River Station II, the Commission explicitly assumed that the proposed Station II included no capacity to serve GMWSS and some other municipalities (acting together as the Bluegrass Water Supply Commission). 4/25/08 final Order, Case No. 2007-000134, p. 52.

In addition, GMWSS's usage at the interconnection is not on-demand, KAWC's service obligation is not instantaneous, and service under the Agreement is explicitly "pending water availability." (Agreement §5, p.2). GMWSS cannot take Sales for Resale service

from KAWC at Champion Way without first coordinating with KAWC or without KAWC setting up a meter to provide the service. If KAWC does not have the water supply and other capacity to serve GMWSS, requested service at the Champion Way interconnection would not be provided. As such, GMWSS should not be paying rates with any meaningful amount of fixed costs of production included.

Similarly, the location of the Champion Way interconnection hardly required significant transmission or distribution investment for KAWC to serve. By the time the 1999 Agreement was entered into, KAWC already served the geographic area in which the current point of service to GMWSS is located. Based on the KAWC 3/12/99 “proposed investment sketch” attached to the 1999 Agreement, the incremental investment necessary to provide the point of service is relatively minimal.

- b. The conclusion that there is a mis-match between KAWC’s actual costs of providing Sales for Resale water to GMWSS at the Champion Way interconnection and current rates at which Sales for Resale is charged the highest volumetric rate (\$8.3091 per 1000 gals.) for the first and 50 millionth gallon taken followed naturally from the facts cited in response subpart a above. GMWSS here provides a brief supporting analysis:
- Prior to the Commission’s 12/16/25 Order in Case No. 2025-00122, KAWC’s rates reflected that the cost of service for higher volume customers, or for customer classes that incur less fixed costs relative to demand, ordinarily results in lower volumetric rates. Using its cost of service study as support, KAWC’s 2025-00122 Application proposed keeping the volumetric rates at their relative levels, with Sales for Resale being the second-lowest volumetric delivery rate. The final Order, however, inverted those relative

levels without citing evidence or making substantive findings in support. Before the 12/16/25 Order, the residential class had the highest volumetric rate (\$6.7291 per 1000 gals), while the Sales for Resale class had the lowest volumetric delivery rate (\$4.9527 per 1000 gallons). See 12/16/25 Order p.69, attached hereto. After the Commission's order, the residential class had the second-lowest volumetric delivery rate (\$7.8656 per 1000 gallons, only the industrial rate was lower), while the Sales for Resale class had the highest volumetric delivery rate (\$8.3091 per 1000 gallons). See 12/16/25 Order Appx.B, attached hereto. Although the Commission found that "Kentucky-American's proposed allocation is reasonable with modifications," and made explained modifications to the residential and commercial classes' rates, the Sales for Resale class was not mentioned at all in the Order's discussion of allocation. Regardless, the rate set by the Commission for the Sales for Resale class was materially different — in absolute and relative level — from one based on the allocation KAWC proposed.

As noted in GMWSS's response to 1 PSC 02, the service at Champion Way is not consumed by GMWSS for end-use, but is for utility resale to its customers. That wholesale use is not strictly determinative of the frequency, duration, timing or volume of demand by the purchasing utility — all of which are cost of service and rate classification considerations. As with KAWC's other rate classifications, its tariff's Sale for Resale class definition is narrowly focused on the intended use of water after it passes through the meter, to the exclusion of other factors listed in KRS 278.030(2). Since GMWSS's service is not firm and is provided on an as-available basis, GMWSS should be provided a rate classification for Champion Way that reflects the fact that service is a sale for

resale, while also taking into account the “nature of the use, the quality used, the quantity used, [and] the time when used,” pursuant to KRS 278.030. That volumetric rate should be much closer to KAWC’s marginal cost of water produced, rather than contributing the most towards system fixed costs on a volumetric basis as KAWC’s highest distribution rate.

Furthermore, having a high-volume or as-available rate be materially higher than a residential or small-volume customer class is inconsistent with the rates of many PSC-regulated utilities, and defies the common sense and judgement that is ordinarily applied to utility cost of service studies and rate design and accepted by the Commission. Specific to KAWC’s Sales for Resale class, the unreasonably high rate also serves as a material impediment to surrounding utilities increasing their dependence on KAWC for centralized water production from current KAWC facility capacity, in lieu of producing water themselves. Increasing the amount of water sold to surrounding utilities, even with only a small markup above the marginal cost of production, could provide significant rate relief to KAWC’s retail customers by spreading system fixed costs over a larger usage base. However, this type of regionalization (using KAWC’s current production facilities and acting as a wholesale supplier of water to surrounding utilities) is not as financially advantageous to KAWC as consolidation through purchasing utilities.

The difference is that as a cost-of-service regulated utility, KAWC does not directly increase ongoing profits through the greater utilization of current investments. Instead, utilities like KAWC increase ongoing profits by investing more, on which they earn a return. Thus, KAWC makes more money when it purchases other utilities that require

significant capital improvement, and it subsequently makes those investments. Selling more water, even at a markup, does not benefit KAWC's ongoing bottom line; it does, however, benefit retail customers. Based on KAWC's 11/21/25 response to GMWSS's RFP (see response to 1 PSC 03, attachment 01-0055 to 01-0074), there does seem to be some level of production capacity available to sell at wholesale at a significant volume. Regardless, at the Sales for Resale rate's current markup, the cost of that wholesale water will continue to be a significant barrier to GMWSS or other surrounding utilities to expand their purchases from KAWC, which represents a lost opportunity for KAWC's retail customers to see greater rate benefits through increased revenues on existing investment.

monthly meter charges by approximately 11 percent, and the volumetric charges based upon their respective class cost to serve.²⁵⁷

Kentucky-American proposed to increase private and public fire charges towards their respective class cost to serve, with revenue increase not exceeding 125 percent of the overall revenue increase percentage.²⁵⁸ The table below illustrates the present and proposed rates by Kentucky-American:²⁵⁹

	Present Meter Charge	Proposed Meter Charge	Percent Increase
Meter Size			
5/8" Meter	\$17.55	\$19.45	11%
3/4" Meter	\$26.20	\$29.00	11%
1" Meter	\$43.60	\$48.30	11%
1 1/2" Meter	\$87.30	\$96.80	11%
2" Meter	\$139.70	\$154.80	11%
3" Meter	\$261.90	\$290.30	11%
4" Meter	\$436.60	\$483.90	11%
6" Meter	\$873.00	\$967.50	11%
8" Meter	\$1,396.80	\$1,548.00	11%
	Present Volumetric Charge	Proposed Volumetric Charge	Percent Increase
Customer Class			
Residential	\$6.7291	\$9.4567	41%
Commercial	\$6.0875	\$8.1129	33%
Industrial	\$5.0324	\$6.8779	37%
Public Authorities	\$5.6070	\$7.8187	39%
Sales for Resale	\$4.9527	\$6.9266	40%
Bulk	\$4.0000	\$6.1736	54%

The monthly meter charges supported by the COSS slightly differ from the proposed rates. In most meter sizes, the COSS supports a lower monthly meter charge than proposed by Kentucky-American. Notably, the 5/8" meter, which services primarily

²⁵⁷ McClellan Direct Testimony at 16.

²⁵⁸ McClellan Direct Testimony at 16.

²⁵⁹ McClellan Direct Testimony at 17, Table 4 and Table 5.

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2025-00122 DATED DEC 16 2025

The following rates and charges are prescribed for the customers in the area served by Kentucky-American Water Company. All other rates and charges not specifically mentioned herein shall remain the same as those in effect under the authority of the Commission prior to the effective date of this Order.

Monthly Service Charge

Meter Size

5/8" – Meter	\$19.89 Minimum Bill
3/4" – Meter	\$29.75 Minimum Bill
1" – Meter	\$49.45 Minimum Bill
1 1/2" – Meter	\$98.95 Minimum Bill
2" – Meter	\$158.40 Minimum Bill
3" – Meter	\$296.85 Minimum Bill
4" – Meter	\$494.85 Minimum Bill
6" – Meter	\$989.40 Minimum Bill
8" – Meter	\$1,583.05 Minimum Bill

Volumetric Charge

Service Type

Residential	\$0.0078656 per Gallon
Commercial	\$0.0080066 per Gallon
Industrial	\$0.0070849 per Gallon

Other Public Authority	\$0.0080347 per Gallon
Sales for Resale	\$0.0083091 per Gallon

Monthly Public or Private Fire Connections

Size of Service

2" Diameter	\$14.00 per Month
4" Diameter	\$56.00 per Month
6" Diameter	\$125.55 per Month
8" Diameter	\$223.00 per Month
10" Diameter	\$348.25 per Month
12" Diameter	\$521.25 per Month
14" Diameter	\$502.00 per Month
16" Diameter	\$891.50 per Month

Hydrant Charge

Public Hydrant	\$75.00 per Month
Private Hydrant	\$120.00 per Month

Bulk Sales

Rate per 50 Gallons	\$3.2946
Rate per 100 Gallons	\$5.5892

Request

8. Refer to the Azevedo Direct Testimony, page 12, lines 11-18, and page 13, lines 1-9.
 - a. Provide the calculations and assumptions supporting the approximately \$11.05 per 1,000 gallons hypothetical rate.
 - b. Explain the statement that the previously ordered rate of \$8.3091 was \$1.4825 more than Kentucky-American's proposed rate of \$6.9266 when the mathematical difference between those rates is \$1.3825 and provide any necessary correction to the testimony.
-

Response

- a. As noted in lines 12-14 on page 12 of the Azevedo Direct Testimony, the Sales for Resale rate set in the 12/16/25 Order in Case No. 2025-00122 (\$8.3091 per 1000 gallons) added 28 percentage points to the increase proposed by Kentucky-American:

$$\frac{\text{KAWC proposed rate}}{\text{then-existing rate}} = \frac{6.9266}{4.9527} = 1.40, \text{ a 40\% increase}$$

$$\frac{12/16/25 \text{ Ordered rate}}{\text{then-existing rate}} = \frac{8.3091}{4.9527} = 1.68, \text{ a 68\% increase}$$

$$68\% - 40\% = 28\%, \text{ adding 28 percentage points to the increase}$$

If the final Order in this case adds 28 percentage points to the increase proposed by Kentucky-American (to \$8.7371 per 1000 gallons), then the Sales for Resale rate would become approximately \$11.05 per 1000 gallons.

$$\text{existing rate} = 8.3091$$

$$8.3091 \times 0.28 = 2.3265 \quad \text{amount of a 28\% increase}$$

$$8.7371 + 2.3265 = 11.0636 \quad \text{which rounds down to approx. \$11.05 per 1000 gallons}$$

- b. Yes, the difference between the Sales for Resale rate proposed by Kentucky-American of (\$6.9266 per 1000 gallons) and the Sales for Resale rate set in the 12/16/25 Order in Case No. 2025-00122 (\$8.3091 per 1000 gallons) is **\$1.3825** per 1000 gallons. Provided as part of this response to 1 PSC 08, is a revised page 13 of the Azevedo Direct Testimony with the typographical error corrected to state a difference of \$1.3825 per 1000 gallons.

1 rate — approximately \$11.05 per 1000 gallons — would have more than doubled within a 13-
2 month period.

3 **Q: Is the disincentive only that the rate has risen to such a high level and is increasing?**

4 No. It is also the unpredictability of the rate. KAWC has told us that its tariff rates could
5 be increased or decreased by any and all factors affecting its operations, which makes for a wide
6 scope of uncertainty with respect to KAWC's frequent requests for a general adjustment of rates.
7 Furthermore, its requests do not represent a cap on the resulting increases in wholesale rates, as
8 illustrated by the PSC's Final Order in Case No. 2025-00122, which further increased the Sales
9 for Resale usage rate by \$1.3825 more per 1000 gallons than KAWC requested. It is also
10 difficult to understand the basis for KAWC's proposed rate allocations to the Sales for Resale
11 category, both because KAWC incurs little fixed cost in serving GMWSS at the Champions Way
12 interconnection and that service is incidental to KAWC's provision of end-use service. Other
13 drivers of unpredictability are KAWC's frequent and ongoing acquisition of other water (and
14 sewer) systems and KAWC's use of forecasts rather than verifiable, historical data. The only
15 thing predictable to GMWSS about these forecasts is that KAWC will make choices,
16 assumptions, and projections that are to its benefit.

17 **Q: Please sum up these problems from GMWSS's perspective.**

18 When planning for its long-term water supply future, GMWSS continues to carefully
19 assess all options available. It can be argued that KAWC currently has the most readily available
20 infrastructure and capacity to supply GMWSS with water beyond what we produce at our own
21 water treatment plant and that all other options available to GMWSS require significant capital
22 investment for new infrastructure. However, due to the volatility of its rates, KAWC's relentless
23 acquisition of utility systems (and our concern that KAWC is spreading the costs from such