

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 Kentucky American Water Company's First Request for Information**

Georgetown Municipal Water and Sewer Service ("GMWSS") herewith submits its Response to the Kentucky American Water Company'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 "KAW 01-___".

Respectfully submitted,

/s/ Katherine K. Yunker

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McBRAYER PLLC

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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 Kentucky American Water Company'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.

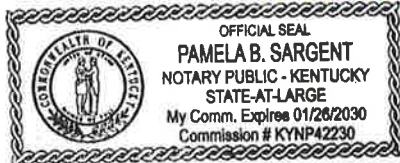

CHASE AZEVEDO

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



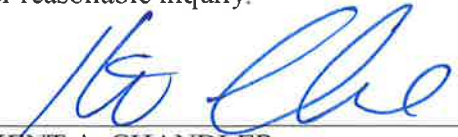

NOTARY PUBLIC

{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 Kentucky American Water Company'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.

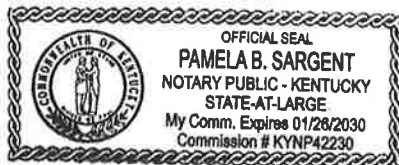

KENT A. CHANDLER

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. All Intervenors witnesses. Provide, in Excel spreadsheet or other format, with all formulas, columns and rows unprotected and fully accessible, all workpapers and source documents not previously provided relied upon by Intervenors in this matter.
-

Response

None provided in response to this request.

Request

2. Mr. Azevedo. Provide a detailed description of GMWSS’ “program of major upgrades to the Royal Spring water treatment” referenced at page 9 of the Azevedo testimony. Include a description of all upgrades for the period 2026 to 2036.
-

Response

The program includes the following upgrade, replacement, and new construction projects to be completed within the next 4 years, with the exception of WTP-008, which is the clarifier project completed in March 2026:

WTP

001*	Construction of a new factory building
002*	Rehab filters and filter media – filter media size and depth assessment
003*	Raw water basin drains replacement
004	Repaint filter gallery - Replace rusted bolts and repainting of piping and valves
005	Convert from gas to liquid ammonia feed system
006	Removal of air scrubber/strippers
007	UV system building – removal of existing structure and replacement of existing structure
008*	Clarifier Rehabilitation — included sand blasting and repainting of all carbon steel, pressure washing and painting of concrete, and cleaning of tube settlers
009	Filter control panel replacement
010	Chemical spill containment for liquid bulk chemicals
011	PFAs Water Treatment Assessment and Analysis (no defined project)
012*	PFAs – Water Treatment Plant Improvement Project (no defined project yet)

- * indicates a project which is likely to require shut-down or significant reduction to operation of the Royal Spring water treatment plant for at least 24 hours to 30 days (or possibly a longer duration depending on scope of work).

Further details of each project are attached as KAW 01-0001 to 01-0009.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
New Prefabricated Electrical Building	1	LS	\$ 250,000.00	\$ 250,000.00
New Electrical MCC's, Panel Boards, & Switchgear	1	LS	\$ 275,000.00	\$ 275,000.00
Construction Subtotal				\$ 525,000.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 10,500.00	\$ 10,500.00
Contractor Overhead & Profit (15%)	1	LS	\$ 78,750.00	\$ 78,750.00
Construction Total				\$ 614,250.00
Construction Contingency (30%)	1	LS	\$ 184,275.00	\$ 184,275.00
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS	\$ 53,326.88	\$ 53,326.88
Resident Inspection Services ¹	1	LS	\$ 38,062.50	\$ 38,062.50

Opinion of Cost: \$ **890,000.00**

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
Replace Concrete Stairs	1	LS	\$ 20,000.00	\$ 20,000.00
New Aluminum Handrails	1	LS	\$ 5,500.00	\$ 5,500.00
Construction Subtotal				\$ 25,500.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 510.00	\$ 510.00
Contractor Overhead & Profit (15%)	1	LS	\$ 3,825.00	\$ 3,825.00
Construction Total				\$ 29,835.00
Construction Contingency (30%)	1	LS	\$ 8,950.50	\$ 8,950.50
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS		\$ -
Resident Inspection Services ¹	1	LS		\$ -

Opinion of Cost: \$ 38,800.00

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
4 Man Work Crew	1280	Hour	\$ 75.00	\$ 96,000.00
Equipment Rental	8	Week	\$ 2,500.00	\$ 20,000.00
12 DI Drain Pipe & Fittings	325	LF	\$ 150.00	\$ 48,750.00
6" Stainless Steel Mud Valves	10	CY	\$ 1,250.00	\$ 12,500.00
Concrete	25	CY	\$ 1,000.00	\$ 25,000.00
Bypass Pumping	8	Week	\$ 3,500.00	\$ 28,000.00
Construction Subtotal				\$ 230,250.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 4,605.00	\$ 4,605.00
Contractor Overhead & Profit (15%)	1	LS	\$ 34,537.50	\$ 34,537.50
Construction Total				\$ 269,392.50
Construction Contingency (30%)	1	LS	\$ 80,817.75	\$ 80,817.75
Easements (2.5%)	1	LS	\$ -	\$ -
Engineering (Design, Bidding, CA) ¹	1	LS	\$ 27,428.82	\$ 27,428.82
Resident Inspection Services ¹	1	LS	\$ 22,831.59	\$ 22,831.59

Opinion of Cost: \$ 400,500.00

Estimator: Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
Replace rusted bolts and repainting of piping and valves	1	LS	\$ 150,000.00	\$ 150,000.00
Construction Subtotal				\$ 150,000.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 3,000.00	\$ 3,000.00
Contractor Overhead & Profit (15%)	1	LS	\$ 22,500.00	\$ 22,500.00
Construction Total				\$ 175,500.00
Construction Contingency (30%)	1	LS	\$ 52,650.00	\$ 52,650.00
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS		\$ -
Resident Inspection Services ¹	1	LS		\$ -

Opinion of Cost: \$ 228,200.00

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
New vertical turbine Raw Water pumps with VFD rated motors	3	EA	\$ 65,000.00	\$ 195,000.00
VFD control panel, conduit, signal wires, and integration to SCADA	1	LS	\$ 125,000.00	\$ 125,000.00
Construction Subtotal				\$ 320,000.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 6,400.00	\$ 6,400.00
Contractor Overhead & Profit (15%)	1	LS	\$ 48,000.00	\$ 48,000.00
Construction Total				\$ 374,400.00
Construction Contingency (30%)	1	LS	\$ 112,320.00	\$ 112,320.00
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS	\$ 35,648.00	\$ 35,648.00
Resident Inspection Services ¹	1	LS	\$ 27,648.00	\$ 27,648.00

Opinion of Cost: **\$ 550,100.00**

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
Demolition of Current Structure	1	LS	\$ 50,000.00	\$ 50,000.00
Repiping and Repainting	1	LS	\$ 15,000.00	\$ 15,000.00
Construction Subtotal				\$ 65,000.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 1,300.00	\$ 1,300.00
Contractor Overhead & Profit (15%)	1	LS	\$ 9,750.00	\$ 9,750.00
Construction Total				\$ 76,050.00
Construction Contingency (30%)	1	LS	\$ 22,815.00	\$ 22,815.00
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS		\$ -
Resident Inspection Services ¹	1	LS		\$ -

Opinion of Cost: \$ 98,900.00

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
Demolition of Current Structure	1	EA	\$ 5,000.00	\$ 5,000.00
Panel Built 10'X10" Prefabricated Structure	1	EA	\$ 50,000.00	\$ 50,000.00
Construction Subtotal				\$ 55,000.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 1,100.00	\$ 1,100.00
Contractor Overhead & Profit (15%)	1	LS	\$ 8,250.00	\$ 8,250.00
Construction Total				\$ 64,350.00
Construction Contingency (30%)	1	LS	\$ 19,305.00	\$ 19,305.00
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS		\$ -
Resident Inspection Services ¹	1	LS		\$ -

Opinion of Cost: \$ 83,700.00

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
Sand Blast and Repainting of Carbon Steel structure in Clarifier	1	LS	\$ 50,000.00	\$ 50,000.00
Replace Center Drive Assembly	1	LS	\$ 75,000.00	\$ 75,000.00
Tube Settlers	1	LS	\$ 125,000.00	\$ 125,000.00
Construction Subtotal				\$ 250,000.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 5,000.00	\$ 5,000.00
Contractor Overhead & Profit (15%)	1	LS	\$ 37,500.00	\$ 37,500.00
Construction Total				\$ 292,500.00
Construction Contingency (30%)	1	LS	\$ 87,750.00	\$ 87,750.00
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS	\$ 250,000.00	\$ 250,000.00
Resident Inspection Services ¹	1	LS	\$ 24,000.00	\$ 24,000.00

Opinion of Cost: \$ 654,300.00

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.



Georgetown Municipal Utilities Opinion of Cost

Identifier:

Project Name:

Project Description:

Project Type:

Timeframe: Years

Item Description	Number of Units	Units of Measure	Unit Cost	Total Cost
New SCADA Control Panel with HMI touch screens and associated programming	1	LS	\$ 175,000.00	\$ 175,000.00
Construction Subtotal				\$ 175,000.00
Contractor Bonds & Insurance (2%)	1	LS	\$ 3,500.00	\$ 3,500.00
Contractor Overhead & Profit (15%)	1	LS	\$ 26,250.00	\$ 26,250.00
Construction Total				\$ 204,750.00
Construction Contingency (30%)	1	LS	\$ 61,425.00	\$ 61,425.00
Easements (2.5%)	1	LS		\$ -
Engineering (Design, Bidding, CA) ¹	1	LS	\$ 22,137.50	\$ 22,137.50
Resident Inspection Services ¹	1	LS		\$ -

Opinion of Cost: \$ 288,400.00

Estimator:

Date:

¹Engineering & Resident Inspection Services estimated by using the USDA Rural Development (RD) Fee Curves.

Request

3. Mr. Azevedo. Reference page 9 of the Azevedo testimony. State whether the amount of water purchased from KAWC in February and March of 2026 at the Champion Way interconnection will be repeated in 2027. If not, state the amount of water GMWSS expects to purchase at the Champion Way interconnection in 2027.
-

Response

GMWSS has budgeted for FY27 (July 1, 2026 – June 30, 2027) \$448,315 for wholesale purchases from KAWC. This amount is equivalent to over 53 million gallons at current rates; this allows and plans for the possibility that the quantity purchased from KAWC in February-March 2026 at the Champion Way interconnection will be repeated over a 12-month period extending into 2027.

Request

4. Mr. Azevedo. Reference page 9 of the Azevedo testimony. State whether the Royal Spring water treatment plant is planned to be taken off-line during 2027 for any reason. If so, state the reason. Provide the same information for every year from 2028 to 2036. If there are plans to take the Royal Spring water treatment plant off-line at any time during the next 10 years, provide the amount of water GMWSS plans to purchase from KAWC at the Champion Way interconnection
-

Response

Please refer to GMWSS's responses to 1 KAW 02 & 03 and 1 PSC 04. Depending on the time of year and the growth in demand on GMWSS's system, the purchases from KAWC would likely be equal to the per-day average during the 2026 clarifier project for each day the plant is shut down.

Request

5. Mr. Azevedo. Reference page 9 of the Azevedo testimony. Describe how frequently GMWSS conducts a “clarifier project” at the Royal Spring treatment plant. State when such a project was last conducted prior to 2026 and state when such a project is expected to happen next.
-

Response

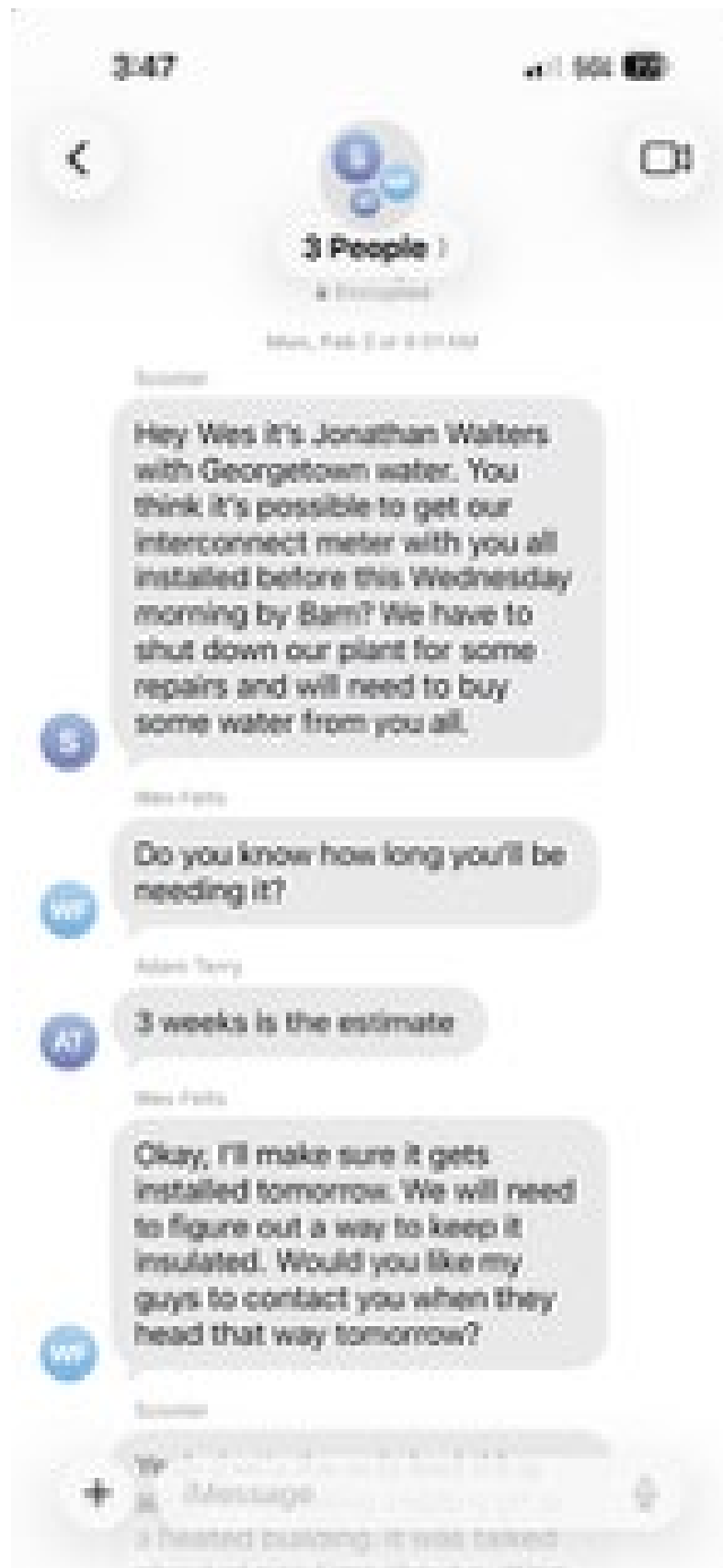
A project like the February-March 2026 clarifier project is infrequent at the Royal Spring treatment plant. It has been since at least 2018, and the next one has not been scheduled.

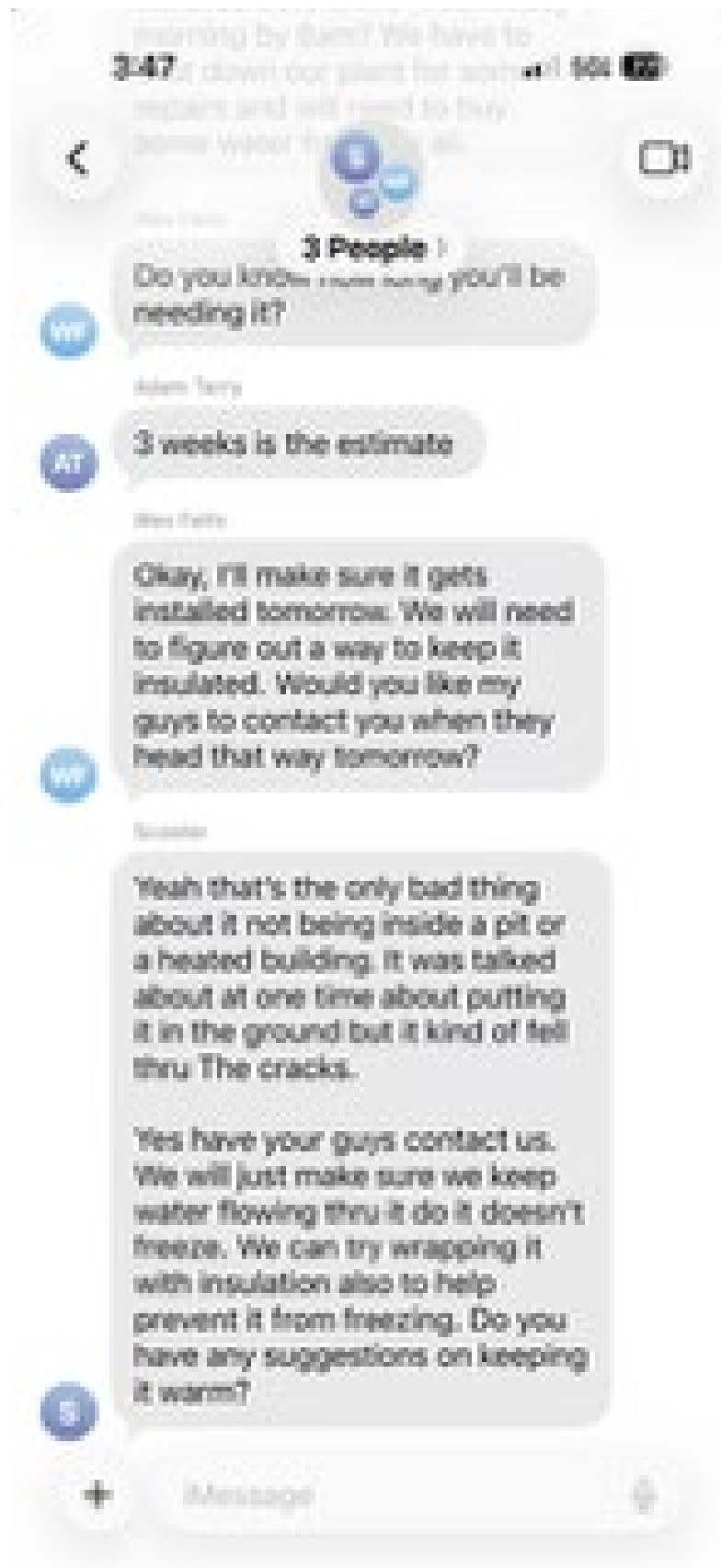
Request

6. Mr. Azevedo. Reference page 9 of the of the Azevedo testimony. State who at GMWSS “made a request to KAWC distribution personnel to open the connection” and to whom it was made. Provide the date and time of the request and describe how it was made. Provide a detailed narrative describing the request, including the circumstances giving rise to the request, all individuals involved, the manner in which the request was communicated and any actions taken in response. Produce all documents that describe, memorialize, transmit or relate to that request.
-

Response

GMWSS employee Jonathan Walters spoke and texted with Wes Felts, a KAWC Distribution Supervisor, who arranged for the meter to be installed and the line flushed. Their discussions included that there were to be repairs at the plant shutting it down, how long GMWSS might need to take wholesale water at the interconnection, and insulation or other ways to keep the above-ground piping from freezing. Attached as KAW 01-0010 to 01-0011 are screenshots of text messages exchanged between Mr. Felts, Mr. Walters and GMWSS employee Adam Terry in the earliest days of February 2026. The request is for installation “before this Wednesday, 8 a.m.”; that Wednesday was February 3, 2026.





Request

7. Mr. Azevedo. Provide a copy of all documents that set forth, govern, memorialize or otherwise describe the contractual or legal relationship between KAWC and GMWSS for water purchases at the Champion Way interconnection. If unable to produce such document(s), describe in detail the nature of the relationship, including the basis upon which GMWSS purchases water from KAWC at the Champion Way interconnection.
-

Response

Please see the GMWSS responses to 1 PSC 02, 05 and 07.

Request

8. Mr. Azevedo. Reference page 9 of the Azevedo testimony. Provide a copy of all documents by which GMWSS provided advance notice to KAWC of the expected increase in water purchased by GMWSS from KAWC in February and March of 2026 as a result of the Royal Spring water treatment plant being taken off-line. If no such documents exist, state so expressly and identify whether any advance notice was provided orally. If advance notice was provided orally, identify the individuals involved, to whom at KAWC the communication was made, the date, and a detailed description of the substance of the communication.
-

Response

Please see the GMWSS response to 1 KAW 06.

Request

9. Reference page 10 of the Azevedo testimony. State who at GMWSS contacted KAWC personnel “about the mistaken, estimated bills” and to whom at KAWC that contact was made. Provide the dates and times of these contacts. Provide all documents describing or making those contacts. If no such documents exist, state so expressly and identify whether any communication was contacted orally. If communication was conducted orally, identify the individuals involved, with whom the “mistaken, estimated bills” were discussed, the date and a detailed description of the substance of the communication.
-

Response

Upon due inquiry, this is the responsive information that GMWSS has:

After GMWSS had received 3-4 KAWC bills with estimated amounts well below the 51,409,317 gallon usage indicated by its read of the Champion Way meter on February 5 and March 10, 2026, there was a concern that the bills for this FY2026 usage might not be received before the close of the fiscal year on June 30, 2026. The GMWSS Accounting Manager, Jeff Nutter, contacted Wes Felts, who was identified in GMWSS’s contacts listing as the/a KAWC Water Distribution Supervisor. It was a brief call, in which Mr. Nutter explained to Mr. Felts the actual usage at the Champion Way interconnect and asked who at KAWC to speak with to get GMWSS invoiced for that usage. Mr. Felts said he would try to find someone to help us and would let us know; Mr. Nutter did not hear from Mr. Felts after that. The call occurred during regular business hours, and Mr. Nutter’s recollection is that it was in mid-May 2026.

Other than the KAWC invoices showing the estimated, incorrect amounts, GMWSS has not found any written communications between it and KAWC about the estimated bills. There

were later filings and discussions between GMWSS's and KAWC's counsel of record in this case about the estimated vs. actual amounts.

Request

10. Mr. Azevedo. Reference page 9 of the Azevedo testimony. Provide a copy of all documents by which GMWSS provided advance notice to the Frankfort Plant Board of the expected increase in water purchased by GMWSS from the Frankfort Plant Board in February and March of 2026 as a result of the Royal Spring water treatment plant being taken off-line.
-

Objection

This request is for document(s) provided to the Frankfort Plant Board (“FPB”) and appears to have no relevance to the issues in this case. As described in the Azevedo Testimony (pp.4-5), GMWSS’s wholesale supply arrangements with FPB are different from those with KAWC, and includes a minimum purchase obligation of 500,000 gallons per day.

GMWSS declines to search out any/all documents responsive to this request.

Request

11. Mr. Azevedo. Reference page 12 of the Azevedo testimony. Provide a copy of the 2022 Water Source Assessment. State whether it is the most recent Water Source Assessment GMWSS has performed. If there is a more recent one, provide it. State when the next Water Source Assessment is expected to be performed.
-

Response

Please refer to the response to 1 PSC 06. The 2022 Water Source Assessment is the most recent one performed by or for GMWSS, and the next one is not scheduled.

Request

12. Mr. Azevedo. Reference Mr. Azevedo's June 2, 2026 Affidavit in support of GMWSS' Motion to Intervene in this matter. State whether Mr. Azevedo included any explanation in that affidavit as to why GMWSS' purchases from KAWC increased significantly in February and March of 2026 and whether those increased purchases are expected again in 2027. If he did not, explain why not.
-

Objection

The GMWSS Motion to Intervene was granted by Commission Order issued June 17, 2026, on findings that its status as a wholesale customer of KAWC and the 2025 approval of a significant increase to the Sales for Resale rate gave it a special interest in this case and that it was likely to develop facts that might assist the Commission in evaluating the effects of KAWC's proposed rates and cost allocations on wholesale customers. The 6/2/26 Affidavit supporting the Motion to Intervene may not have been necessary to intervention (it was not cited in the 6/17/26 Order), but gave evidence of the increase in the amount GMWSS was obligated to pay on more than 51 million gallons of wholesale water supplied so far by KAWC in 2026 due to the rate increase approved by the Commission at the end of 2025, which added to the increase that KAWC had proposed.

GMWSS declines to respond to KAWC's rhetorical, moot questions about what was or was not in the Affidavit or about any decision-making (possibly privileged) about its contents.