

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-	)	
AMERICAN WATER COMPANY FOR AN	)	CASE NO.
ADJUSTMENT OF RATES, APPROVAL OF	)	2026-00094
SYSTEM IMPROVEMENT PROGRAM, AND	)	
TARIFF CHANGES	)	

**GEORGETOWN MUNICIPAL WATER AND SEWER SERVICE'S
MOTION TO INTERVENE**

Georgetown Municipal Water and Sewer Service (“GMWSS”), by counsel, hereby moves the Public Service Commission of Kentucky (“the Commission”), pursuant to Section 4(11) of 807 KAR 5:001, for an order granting intervention in the above-styled matter. In support of this motion, GMWSS states as follows:

GMWSS is a municipal utility owned by the City of Georgetown, Kentucky and was established to manage and control the City’s water and wastewater systems. *See Order, Mallard Point Disposal Systems, Inc.*, Case No. 2013-00311 (Ky. PSC Oct. 8, 2013). GMWSS’s address is 1000 West Main Street, Georgetown, Kentucky 40324.

The Commission has interpreted KRS 278.040(2) as requiring a person seeking intervention to have an interest in the rates or service of a utility as those are the only matters that are subject to the Commission’s jurisdiction. *See Order, Duke Energy Kentucky, Inc.*, Case No. 2020-00266 (Ky. PSC Sept. 3, 2020). GMWSS satisfies this requirement because Kentucky-American Water Company (“KAWC”) is

a wholesale water supplier to GMWSS. In 2025, GMWSS purchased more than 2 million gallons of water from KAWC.¹

807 KAR 5:001, Section 4(11)(b) states:

The commission shall grant a person leave to intervene if the commission finds that he or she has made a timely motion for intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.

GMWSS meets both criteria. GMWSS has special interests in KAWC's rate case that will not otherwise be adequately represented. GMWSS takes service under a KAWC tariff that other intervenors in this docket do not, and the cost of wholesale water service from KAWC affects GMWSS's own cost of service and its retail rates. Other intervenors will not and have not represented GMWSS's interest as a wholesale customer in KAWC rate cases. For example, in KAWC's last rate case, no party intervened or represented wholesale water customers, and the Commission increased the "sale for resale" rate by more than 60%—significantly more than KAWC was proposing (39.9% increase). The Commission's December 16, 2025 order in KAWC's last application for adjustment of rates increased the "sale for resale" rate from \$4.9527 per thousand gallons to \$8.3091 per thousand gallons. *See* Order, at Appx. B, *Kentucky-American Water Company*, Case No. 2025-00122 (Ky. PSC Dec. 16, 2025). The "sale for resale" rate is now KAWC's highest. *See* PSC KY NO. 11 Original Sheet Nos. 1-36, 38-49, Second Sheet No. 37. Since the Commission's

¹ Exhibit 1: Affidavit of Chase Azevedo, General Manager of GMWSS.

December 16, 2025 Order, GMWSS has purchased over 51 million gallons of water from KAWC, for a price of \$428,610.49.²

GMWSS intends to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. In this case, GMWSS plans to address issues including the rate design, cost allocation, return on equity, and certain revenue requirement components.

GMWSS desires to play a constructive role in this matter and isolate issues that are most important to it. GMWSS's focus will serve to neither unduly complicate nor disrupt the proceeding. GMWSS believes that its prior involvement in other cases before the Commission demonstrates its productive standing in the process.

Counsel for GMWSS listed below possesses the facilities to receive electronic transmission of all notices and messages related to this proceeding at the electronic mailing addresses listed below. All correspondence to GMWSS should be sent to the attorney's address or email address listed below.

Accordingly, because GMWSS has a special interest in this case that is not otherwise adequately represented and because it is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings, GMWSS respectfully requests intervention in this proceeding.

² Exhibit 1: Affidavit of Chase Azevedo, General Manager of GMWSS.

Date: June 2, 2026

Respectfully submitted,

STURGILL, TURNER, BARKER &
MOLONEY, PLLC

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