

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF	)	
CAMPBELLSVILLE MUNICIPAL WATER AND	)	CASE NO. 2026-00194
SEWER SYSTEM REVISING ITS WHOLESALE	)	
WATER SERVICE RATES	)	

**MOTION OF CAMPBELLSVILLE MUNICIPAL WATER AND SEWER SYSTEM
TO SUBMIT CASE FOR DECISION ON THE EXISTING RECORD**

Campbellsville Municipal Water and Sewer System (“Campbellsville Water”), by counsel, and pursuant to the procedural schedule set forth in Appendix A to the Commission’s Order entered July 31, 2026, and 807 KAR 5:001, Section 5, moves the Commission to submit this matter for decision on the existing record without an evidentiary hearing, and to enter a final Order approving the proposed wholesale water rates. In support of this Motion, Campbellsville Water states as follows:

PROCEDURAL HISTORY

1. On June 18, 2026, Campbellsville Water filed revised tariff sheets increasing its wholesale water rate by \$1.00 per 1,000 gallons: from \$3.59 to \$4.59 per 1,000 gallons for Columbia/Adair Utilities District, East Casey County Water District, Larue County Water District #1, and Marion County Water District, and from \$3.36 to \$4.36 per 1,000 gallons for Green-Taylor Water District (collectively, the “Districts”), with a proposed effective date of August 1, 2026.

2. By Order entered July 31, 2026, the Commission established this proceeding to investigate the reasonableness of the proposed rates, suspended the proposed tariffs for five months up to and including December 31, 2026, and adopted the procedural schedule attached to the Order as Appendix A. The Commission directed the Executive Director to serve each of the Districts with

a copy of the Order and advised the Districts that any District choosing to participate as an intervenor must comply with 807 KAR 5:001, Section 4(4), and the intervention requirements of 807 KAR 5:001, Section 4(11). Appendix A required that requests for intervention be filed no later than August 7, 2026.

3. On August 7, 2026, Campbellsville Water entered its appearance by counsel and filed the written statement required by 807 KAR 5:001, Section 8(9).

4. No District and no other person moved to intervene on or before August 7, 2026, and no motion to intervene has been filed since. Campbellsville Water is the only party to this proceeding.

5. On August 13, 2026, Commission Staff served its First Request for Information. On August 28, 2026, Campbellsville Water filed its verified responses, together with Exhibits 1 through 9 (Bates numbered 000001 through 000167). Those responses included, among other things, a complete wholesale cost-of-service analysis restated on a single, consistent twelve-month test period of July 1, 2025 through June 30, 2026 (Exhibit 1); the supporting Excel workbook, unprotected and with all formulas accessible (Exhibit 2); the general ledger reports, billing registers, debt obligations schedule, and budget documents from which every figure in the analysis was drawn (Exhibits 3 through 6); the notices sent to each District with proof of delivery (Exhibits 7 and 8); and the Kentucky Infrastructure Authority and Rural Development debt covenant and reserve documents (Exhibit 9).

6. The deadline established in Appendix A for supplemental requests for information to Campbellsville Water, September 14, 2026, has passed, and no supplemental request was issued. Because there are no intervenors, no intervenor testimony was filed, the procedural dates relating to intervenor discovery are moot, and Campbellsville Water has no rebuttal testimony to file.

7. Appendix A requires Campbellsville Water or any intervenor to request either a hearing or that the case be submitted for decision based on the record no later than November 13, 2026. This Motion is timely.

THE RECORD IS COMPLETE AND SUPPORTS THE PROPOSED RATES

8. Campbellsville Water bears the burden of proving that the proposed rates are just and reasonable. KRS 278.190(3). Rates must be fair, just and reasonable. KRS 278.030(1). The existing record carries that burden.

9. The cost-of-service analysis filed as Exhibit 1 establishes that the cost of providing wholesale service to the Districts during the test period ranges from \$5.1167 per 1,000 gallons (Green-Taylor Water District) to \$5.4295 per 1,000 gallons (Columbia/Adair Utilities District). The proposed rates of \$4.59 and \$4.36 per 1,000 gallons are below the cost of serving every District. The total cost of serving the Districts during the test period was \$1,168,458.42, against wholesale revenue of \$766,730.00, a deficiency of \$401,728.42. The proposed increase would recover approximately \$226,149 of that deficiency, leaving approximately \$175,579 unrecovered. (Response to Request Nos. 1, 2, 5, 6 and 7.)

10. The record further explains the rationale for the uniform \$1.00 increase, reconciles the discrepancies Staff identified in the original filing, documents the notice given to each District, and quantifies the financial obligations, including debt service coverage and reserve requirements under the City's Kentucky Infrastructure Authority Assistance Agreements and Rural Development bond ordinances, that the wholesale rates must support. (Response to Request Nos. 2 through 10.)

11. There are no contested issues of fact and no adverse party. An evidentiary hearing would impose expense on Campbellsville Water and its customers without developing any fact not

already in the record. Campbellsville Water, as the only party, therefore waives an evidentiary hearing and consents to decision of this matter on the existing record.

REQUEST FOR TIMELY DECISION

12. The suspension of the proposed tariffs expires December 31, 2026. A final Order before that date would permit the approved rates to take effect on a date certain, without the need for Campbellsville Water to place the rates into effect subject to refund under KRS 278.190(2) and (4), and would give the Districts certainty as to the rate they will pay. Campbellsville Water will file revised tariff sheets reflecting the approved rates and effective date through the Commission's electronic Tariff Filing System within twenty days of the date of service of the Commission's final Order, or within such other time as the Commission directs.

WHEREFORE, Campbellsville Municipal Water and Sewer System respectfully requests that the Commission:

(a) Submit this matter for decision on the existing record without an evidentiary hearing;

(b) Find that the proposed wholesale water rates of \$4.59 per 1,000 gallons for Columbia/Adair Utilities District, East Casey County Water District, Larue County Water District #1, and Marion County Water District, and \$4.36 per 1,000 gallons for Green-Taylor Water District, are fair, just and reasonable, and approve those rates for service rendered on and after January 1, 2027, or such other date as the Commission determines;

(c) Enter its final Order on or before December 31, 2026; and

(d) Grant Campbellsville Water all other relief to which it may be entitled.

Respectfully submitted,

/s/John C. Miller
John C. Miller
BERTRAM, COX & MILLER, LLP
321 East Main Street
P.O. Box 1155
Campbellsville, Kentucky 42719
Telephone: (270) 465-6111
Facsimile: (270) 465-6100
johnm@bcmllp.com
Counsel for Campbellsville Municipal
Water and Sewer System

CERTIFICATE OF COMPLIANCE AND SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that on this the 29th day of October, 2026, the foregoing electronic filing was submitted to the Commission through its electronic filing system; that the electronic filing is a true and accurate copy of the document to be filed in paper medium; that the electronic filing has been transmitted to the Commission; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of this filing in paper medium is not required to be filed with the Commission.

/s/John C. Miller
John C. Miller
Counsel for Campbellsville Municipal
Water and Sewer System