

**3365 Tori Trail Lane  
West Paducah, KY 42086**

**December 8, 2020**

RECEIVED

**Public Service Commission  
P. O. Box 615, 211 Sower Blvd.  
Frankfort, Kentucky 40602-0615**

DEC 11 2020  
PUBLIC SERVICE  
COMMISSION

**Re: Case #2020-00290 Rate Application by Bluegrass Water  
Utility Operating Company**

**To Whom It May Concern:,**

**We just received notification that Bluegrass Water Utility Operating Company has filed a rate application to take over the sewer system for Carriage Park Subdivision in West Paducah, KY 42086, Case #2020-00290. In doing so they have proposed a 500% increase in the sewer rate (to cover proposed improvements). Our system has worked well and continues to work well. As justification for the rate increase, Bluegrass Water discusses an access road needing to be installed to the lagoon, varmint holes in the lagoon berm, and repairs to an existing chain link fence (around the lagoon).**

**There is already an access road to the lagoon which needs only a small amount of gravel and small amount of cleanup, and installation of a low water crossing. There should be no reason for improvements costing over \$100,000.**

**There is no way these minor repairs necessitate a 500% increase in sewer fees. With the number of households in the subdivision having a proposed rate increase at 500%, the payback would be less than 5 years.**

**ENCLOSED you will find a report which was performed on December 5, 2020 of Carriage Park Subdivision by members of the subdivision. You will find the items that were observed and described.**

**Please deny the rate increase request proposed in Case #2020-00290 and investigate this company for price gouging and unethical behavior.**

**Sincerely,**



**Jessie Charles Manley and Carolyn Janette Manley**

**Enclosure**

**Carriage Park Subdivision  
Sewage System Status as of 12/5/2020**

On 12/5/2020, a general walk down was performed of the Carriage Park Subdivision sewage system. The system consists of a passive system composed of two sewage lagoons separated by a mid line berm. A 6' chain link fence surrounds the lagoons and the gates are locked with a chain and padlock. As a result, a walk down could not be performed inside the fence. The following items were observed:

- The lagoon area is provided access by an existing dirt road that is in good condition with no rutting, washouts or erosion. This road, approximately 20' wide and one-quarter mile long, traverses through a wooded area, across a shallow ditch, up a hill, and down the other side. The road provides easy access to the lagoon area. Even with the ground as soft as it is (due to rains and the general fall climate in Western KY) any two, or four-wheel drive pick up truck, has unfettered access and can reach the lagoon. If the ground were dry, a passenger car could easily reach the lagoon area.
- A small drainage ditch, approximately 6 feet wide and three feet deep, crosses the roadway at a point approximately 75' from the roadway head (at the Southwest corner of Carriage Park Subdivision). To provide a crossing, this ditch has had bricks, small concrete blocks (chunks), small rocks, and other non-biodegradable materials placed into the bed of the ditch. This creates a serviceable crossing. However, to improve lagoon access, it would help to create a low water crossing at this location. A low-water fiord (or crossing) could easily be installed (at minimal cost) by excavating the existing materials and placing (and finishing) approximately 5 or 6 cubic yards of concrete. This would create a gentle slope into the bottom of the ditch and up the other side. Installing culverts or a short bridge is not practical due to the amount of wooded debris that would constantly keep the structure plugged and would cause overtopping and erosion.
- The installation of 4" of aggregate (the length and width of the roadway) would help to provide all-weather access. However, the structure (of the current road) does not necessitate the felling of trees, extreme excavation, installation of geo-textile fabric or in any other way demand extreme excavation or geologic change. Simply placing a layer of rock with simple grading and compaction is all that's needed.
- In terms of the lagoons, both are in good shape and are completely surrounded by a 6' chain link fence. The fence is in good condition, with no posts leaning, uprooted or in any other way disturbed. There are no trees or limbs across the fence and not so much as a single fence clip missing. The fence fabric is in great shape, with no rusting or degradation. The area is locked with a padlock and adequately secured.
- All vegetation surrounding the lagoons (inside and outside the fence) has been bush hogged and is in good condition for a distance of approximately 20 yards all the way around the lagoons. There are no trees growing inside or outside the lagoon.
- The berms (lagoon levees) appear to be in good condition (all the way around) and there is no sign of vermin holes or levee breach. There is no sign of overtopping or imperfections that would lead to environmental insult or concern.

Most likely, it would cost less than \$30K to install a low water crossing and install aggregate to create a great roadway and lagoon access.

Note: The adjoining subdivision (Timberland) appears to have had an extreme amount of work performed in the general area of the subdivision lagoon and digester/clarifier. In addition, it has no existing fence. That system has been in bad shape for years and has not been maintained. It is no surprise that a significant amount of money has been poured into that 45 year old sewage system. In no way, does the Carriage Park Subdivision system compare to the Timberland system and the proposed repairs should not be the same. Carriage Park system is less than 20 years old and is a passive system, requiring no mechanical repairs or significant upgrade and it has had no problems.