To: Subject:

RE: KY PSC Utility Inquiry

Date:

Thursday, March 23, 2023 1:26:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432</u> (kv.gov)

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>

Sent: Tuesday, March 21, 2023 3:25 PM

To: PSC Public Comment <PSC.Comment@ky.gov>

Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission cfilings@ky.gov>

Sent: Tuesday, March 21, 2023 9:52 AM

To: PSC Consumer Inquiry < PSC.Consumer.Inquiry@ky.gov>

Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by (

Tuesday, March 21, 2023 at 9:51 AM

Name: Valerie J Crouch Address: 3011 Fairway Ct

City: Georgetown State: Kentucky Zip Code: 40324

Phone number where you can be reached:

Home phone:

Utility Name: Bluegrass Water Utility operating company

State the nature of your concern: As a resident of Longview Subdivision in Scott County we saw our rates increased in the fall of 2021 from \$30 per month to \$85.97 per month roughly a 200% increase. Four other independent sewer systems were included in this filing. It was my understanding that this increase was granted by the PSC to enable BGUOC the raise the funding to

) on

address concerns with these 5 systems. Thus far, we have seen no repairs or improvements to our system. It is my understanding that there are an additional number of independent sewer systems which have been acquired by BGUOC included in this proposed rate increase. It appears that BGUOC has used the prior rate increase to purchase more systems in various rates of disrepair. If this is the case, it is an unfair burden to expect me and my neighborhood to subsidize the purchase and repair of other systems. BGUOC has chosen to purchase these systems and the needs of those systems should not be my financial responsibility. This additional increase in 2 years will add to the hardship to my household is already experiencing. I respectfully request that the Public Service Commission exclude the Longview/Homestead sewer system from this unreasonable fee increase. Thank you. Have you contacted the utility about the problem: No

From: PSC Public Comment

To:
Subject: RE: KY PSC Utility Inquiry

Date: Thursday, March 23, 2023 1:27:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432</u> (kv.gov)

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>

Sent: Tuesday, March 21, 2023 3:25 PM

To: PSC Public Comment <PSC.Comment@ky.gov>

Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission cfilings@ky.gov>

Sent: Tuesday, March 21, 2023 10:04 AM

To: PSC Consumer Inquiry < PSC.Consumer.Inquiry@ky.gov>

Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by

Tuesday, March 21, 2023 at 10:03 AM

Name: Anna Walsh

Address: 2009 Longview Dr.

City: Georgetown

State: KY

Zip Code: 40324

Phone number where you can be reached:

Home phone:

Utility Name: Bluegrass Water UOC

State the nature of your concern: To Whom it May Concern: I am writing to protest the rate increase that has been proposed by the Bluegrass Water Utility Operating Company, LLC (BGUOC). As a resident of Longview Subdivision in Scott County, we saw our rates increased in the fall of 2021 from \$30 per month to \$85.97 per month roughly a 200% increase. Four other independent sewer

on

systems were included in this filing. It was my understanding that this increase was granted by the PSC to enable BGUOC the raise the funding to address concerns with these 5 systems. Thus far, we have seen no repairs or improvements to our system. It is my understanding that there are an additional number of independent sewer systems which have been acquired by BGUOC included in this proposed rate increase. It appears that BGUOC has used the prior rate increase to purchase more systems in various rates of disrepair. If this is the case, it is an unfair burden to expect me and my neighborhood to subsidize the purchase and repair of other systems. BGUOC has chosen to purchase these systems and the needs of those systems should not be my financial responsibility. This additional increase in 2 years will add to the hardship to my household is already experiencing. I respectfully request that the Public Service Commission exclude the Longview/Homestead sewer system from this unreasonable fee increase. Respectfully, Anna Walsh Have you contacted the utility about the problem: No

Subject: RE: KY PSC Utility Inquiry

Date: Thursday, March 23, 2023 1:28:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432</u> (kv.gov)

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>

Sent: Tuesday, March 21, 2023 3:46 PM

To: PSC Public Comment <PSC.Comment@ky.gov>

Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission cfilings@ky.gov>

Sent: Tuesday, March 21, 2023 12:12 PM

To: PSC Consumer Inquiry < PSC.Consumer.Inquiry@ky.gov>

Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by (

Tuesday, March 21, 2023 at 12:12 PM

Name: ROBERT ANDERSON Address: 2013 LONGVIEW DRIVE

City: GEORGETOWN State: Kentucky Zip Code: 40324

Phone number where you can be reached:

Home phone:

Utility Name: BLUEGRASS WATER UOC LLC

State the nature of your concern: THIS IS CRAZY. THIS GREEDY UTILITY JUST RECENTLY GOT OVER

) on

200% INCREAXSE, NOW THEY WANT MORE. WE NEED THE PSC TO STEP UP TO THEIR

RESPONSIBILITY OF PROTECTING IT'S KY. CITIZENS. PLEASE DO NOT APPROVE THIS INCREASE.

Have you contacted the utility about the problem: Yes

Subject: RE: KY PSC Utility Inquiry

Date: Thursday, March 23, 2023 1:28:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432</u> (kv.gov)

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>

Sent: Tuesday, March 21, 2023 3:47 PM

To: PSC Public Comment < PSC.Comment@ky.gov>

Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission cfilings@ky.gov>

Sent: Tuesday, March 21, 2023 1:21 PM

To: PSC Consumer Inquiry < PSC.Consumer.Inquiry@ky.gov>

Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by (

) on Tuesday,

March 21, 2023 at 1:21 PM

Name: Scott T Hall

Address: 1021 Fairway Drive

City: Georgetown State: Kentucky Zip Code: 40324

Phone number where you can be reached:

Home phone:

Utility Name: Bluegrass Water UOC, LLC

State the nature of your concern: PUBLIC SERVICE COMMISSION Po Box 615 Frankfort, KY 40602 Ref: Case # 2022-00432 Bluegrass Water UOC, LLC Dear Sirs: I am writing to protest the rate increase that has been proposed by the Bluegrass Water Utility Operating Company, LLC (BGUOC). As a resident of Longview Subdivision in Scott County we saw our rates increased in the fall of 2021 from

\$30 per month to \$85.97 per month roughly a 200% increase. Four other independent sewer systems were included in this filing. It was my understanding that this increase was granted by the PSC to enable BGUOC the raise the funding to address concerns with these 5 systems. Thus far, we have seen no repairs or improvements to our system. It is my understanding that there are an additional number of independent sewer systems which have been acquired by BGUOC included in this proposed rate increase. It appears that BGUOC has used the prior rate increase to purchase more systems in various rates of disrepair. If this is the case, it is an unfair burden to expect me and my neighborhood to subsidize the purchase and repair of other systems. BGUOC has chosen to purchase these systems and the needs of those systems should not be my financial responsibility. This additional increase in 2 years will add to the hardship to my household is already experiencing. I respectfully request that the Public Service Commission exclude the Longview/Homestead sewer system from this unreasonable fee increase. Respectfully, Scott T. Hall Resident Longview Estates 1021 Fairway Drive 40324 FYI... Go back and look at my original complaint from several years ago when they tripled our rates. I predicted this would happen.

Have you contacted the utility about the problem: No

To: Subject:

RE: KY PSC Utility Inquiry

Date:

Thursday, March 23, 2023 1:29:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at View Case Filings for: 2022-00432 (ky.gov)

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>

Sent: Wednesday, March 22, 2023 11:24 AM **To:** PSC Public Comment <PSC.Comment@ky.gov>

Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission <<u>pscfilings@ky.gov</u>>

Sent: Wednesday, March 22, 2023 11:15 AM

To: PSC Consumer Inquiry < PSC.Consumer.Inquiry@ky.gov>

Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by (

on Wednesday, March 22, 2023 at 11:14 AM

Name: Bethany Graham Address: 157 E Airview Dr

City: Elizabethtown

State: KY

Zip Code: 42701

Phone number where you can be reached:

Home phone:

Utility Name: Bluegrass Water

State the nature of your concern: Bluegrass Water is raising our sewage bill yet again. In the 3 years we've lived here, the bill went from ~\$40 to ~\$85 and now they want to charge ~\$100. That is ridiculous. Airview Estates is not a rich neighborhood— there are many people who live on a fixed income and cannot afford to keep having their rates increase. Not only does this affect current residents, but also for future sales of homes in the area as not many people would want to pay a sewage bill that high. Bluegrass Water should have known the sewage issues when they bought out the company. We cannot help the old company didn't complete the proper repairs and it should not be on us to pay more when we've already paid so much. We can't fix the poor purchase that Bluegrass Water made. Does the electricity company

charge their customers more when poles go down or electricity goes out and they have to do repairs? Yet we are expected to pay more for sewage repairs that should have been completed regardless? Not only that, but there's several areas over the last year in the neighborhood where standing sewage were in homeowners' backyards. This is unacceptable and needs to be stopped.

Have you contacted the utility about the problem: No

PSC Public Comment From: To: Subject: RE: KY PSC Utility Inquiry

Thursday, March 23, 2023 1:30:00 PM Date:

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at View Case Filings for: 2022-00432 (ky.gov)

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>

Sent: Wednesday, March 22, 2023 12:49 PM **To:** PSC Public Comment < PSC.Comment@ky.gov>

Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission cfilings@ky.gov>

Sent: Wednesday, March 22, 2023 12:32 PM

To: PSC Consumer Inquiry < PSC.Consumer.Inquiry@ky.gov>

Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by Wednesday, March 22, 2023 at 12:32 PM

Name: Keith Rogers

Address: 113 Elizabeth Jade Ln

City: Georgetown

State: KY

Zip Code: 40324

Phone number where you can be reached:

Home phone:

Utility Name: Bluegrass Water

State the nature of your concern: 692% rate increase is way to much to be expected to pay and add to a budget. However I do realize that a rate increase will happen. Not sure why a 100% increase would not suffice. Do they really expect to get their money back on one year.?

on

Have you contacted the utility about the problem: Yes

From: PSC Public Comment

To:
Subject: RE: KY PSC Utility Inquiry

Date: Thursday, March 23, 2023 1:33:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at View Case Filings for: 2022-00432 (ky.gov)

Thank you for your interest in this matter.

From: PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>

Sent: Wednesday, March 22, 2023 1:33 PM

To: PSC Public Comment <PSC.Comment@ky.gov>

Subject: FW: KY PSC Utility Inquiry

From: KY Public Service Commission <<u>pscfilings@ky.gov</u>>

Sent: Wednesday, March 22, 2023 1:31 PM

To: PSC Consumer Inquiry < PSC.Consumer.Inquiry@ky.gov>

Subject: KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by (Wednesday, March 22, 2023 at 1:30 PM

wednesday, Waren 22, 2023 at 1.30 f W

Name: David Andes Address: 3003 Fairway Ct

City: Georgetown

State: KY

Zip Code: 40324

Phone number where you can be reached:

Home phone:

Utility Name: Bluegrass Water UOC LLC

State the nature of your concern: PUBLIC SERVICE COMMISSION Po Box 615 Frankfort, KY 40602 Ref: Case # 2022-00432 Bluegrass Water UOC, LLC TOO: whoever it concerns I am writing to protest the rate increase that has been proposed by the Bluegrass Water Utility Operating Company, LLC (BGUOC). As a resident of Longview Subdivision in Scott County we saw our rates increased in the fall of 2021 from \$30 per month to \$85.97 per month roughly a 200% increase. Four other independent sewer systems were included in this filing. It was my understanding that this increase was granted by the PSC to enable BGUOC the raise the funding to address concerns with these 5 systems. Thus far, we have seen no repairs or improvements to our system. It is my understanding that there are an additional number of

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independent sewer systems which have been acquired by BGUOC included in this proposed rate increase. It appears that BGUOC has used the prior rate increase to purchase more systems in various rates of disrepair. If this is the case, it is an unfair burden to expect me and my neighborhood to subsidize the purchase and repair of other systems. BGUOC has chosen to purchase these systems and the needs of those systems should not bemy financial responsibility. This additional increase in 2 years will add to the hardship to my household is already experiencing. I respectfully request that the Public Service Commission exclude the Longview/Homestead sewer system from this unreasonable fee increase. Respectfully, Have you contacted the utility about the problem: Yes

To:

 Subject:
 RE: 2022-00432 bluegrass water

 Date:
 Thursday, March 23, 2023 1:34:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432 (ky.gov)</u>

Thank you for your interest in this matter.

From: Vina Eversole

Sent: Wednesday, March 22, 2023 6:55 PM

To: PSC Public Comment < PSC.Comment@ky.gov>

Subject: 2022-00432 bluegrass water



I'm on a very small fixed income and I cannot afford a large increase I my sewer bill. Vina Eversole Moon Lake Subdivision Sent from my iPhone

To:

 Subject:
 RE: 2022-00432 Bluegrass Water

 Date:
 Thursday, March 23, 2023 1:34:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432 (kv.gov)</u>

Thank you for your interest in this matter.

From: Bonnie Shepherd

Sent: Wednesday, March 22, 2023 7:01 PM

To: PSC Public Comment < PSC.Comment@ky.gov>

Subject: 2022-00432 Bluegrass Water



I am an elderly women on a fixed income. This will cause me a big hardship.

Clarinda Shepherd Moon lake subdivision

To:

 Subject:
 RE: 2022-00432 Bluegrass Water

 Date:
 Thursday, March 23, 2023 1:35:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432 (kv.gov)</u>

Thank you for your interest in this matter.

From: Rodney Eversole

Sent: Wednesday, March 22, 2023 7:13 PM

To: PSC Public Comment < PSC.Comment@ky.gov>

Subject: 2022-00432 Bluegrass Water



To whom it may concern we are living in difficult times where everything is raising astronomical. It is insane to raise the price the proposed amount. I have a mother and mother in law who also use this company and live on a small fixed income. This will impose a hard ship on them as well as others. A person should not have to decide if they are going to eat or pay their bills. Increases like this will cause people to do without necessities and food to pay ridiculous prices for things they have no control over.

This raise in premium will force people to have to pay such a large increase without choice or any options putting burdens on people that can't afford to pay the proposed amount.

Please consider the effect this will have on everyone. Some may be able to afford this even though it is crazy, but many already struggle to pay their bills now. This will only create more hardship for people who can't afford this!

Rodney and Terry Eversole Georgetown KY.

To: Subject:

RE: Public Comments for Case: 2022-00432 - Bluegrass Water Utility Operating Company, LLC

Date: Thursday, March 23, 2023 1:36:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432 (ky.gov)</u>

Thank you for your interest in this matter.

From: KY Public Service Commission Public Comments <psc.comment@ky.gov>

Sent: Thursday, March 23, 2023 11:15 AM

To: PSC Public Comment <PSC.Comment@ky.gov>

Subject: Public Comments for Case: 2022-00432 - Bluegrass Water Utility Operating Company, LLC

Public Comments for Case 2022-00432 submitted by

on Thursday, March

23, 2023 at 11:14 AM

Name: Sheri H Scott

Address: 130 Alexandra Jett Lane

City: Georgetown

State: KY

Zip Code: 40324

Phone number where you can be reached:

Home phone:

Comments: To: PSC Public Information Officer Psc.info@ky.gov From: Sheri H. Scott, 130 Alexandra Jett Ln., Georgetown, KY 40324 Subject: Request For Intervention Regarding Case # 2022-00432 To Whom It May Concern, I recently received a letter from Bluegrass Water Utility Operating Company, LLC dated February 27, 2023 indicating their application and request for adjustment of rates and approval of construction per PSC Case #2022-00432. My contact information is as follows: Sheri H. Scott 130 Alexandra Jett Lane Georgetown, KY 40324 I live in the I-75/Delaplain Exchange (Riffton Meadows) neighborhood, which as part of Case #2022-00432. Our neighborhood is facing a potential increase in Total Monthly Sewer - Single Residential service from \$12.50 per month to \$99.37 per month. This is a proposed monthly rate increase of 694.9%. I strongly request intervention regarding this case under the following grounds: 1. Power Imbalance/Monopoly/Market Failure — This is a private company, buying up sewer systems that provide a public good (sewer + environmental impact). Bluegrass Water speaks about costs/benefits, etc as if we had a market here. But, I have only one choice of where to get my sewer services. If they dramatically increase their revenue stream, they can sell this system for a profit based on years of higher rates extracted from

me and my neighbors without assistance from state or local governments and outside a system of state and municipal grants. Systems owned by municipalities all over Kentucky are eligible for grants and are receiving grants, because they are facing many of the same repair issues that we are facing, related to providing clean water and living conditions. State and local taxes are available to assist them, but not available to assist me. Other systems, further out in the county (Mallard Point, etc) were acquired years ago by GMWSS. This is a course that enables their taxes to support maintenance and upgrade to their systems. I challenge the legitimacy of privatizing a system like this that provides a public good, where the "buyers" have no recourse to seek better rates in the market and where the "seller" is free to seek an almost 7x increase. Our only advocate is the PSC. I want more government involvement in ensuring that the burden of these public matters do not fall unfairly to a subset of private systems without government grants and assistance that are available to other taxpayers and municipal systems. 2. Outrageous Amount of Increase - The proposed rate increase of 694.9% is totally outrageous and beyond reason. A recent report from energy gov showed that from 2008-2016, the average annual wastewater price escalation rate in the South-South East region, which includes the state of Kentucky, was 3.2% (U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy, Water and Wastewater Annual Price Escalation Rates For Selected Cities across the United States, September 2017). Based on this information, the proposed rate increase of 694.9% requested by Bluegrass Water Utility Operating Company, LLC would equate to the average annual wastewater price escalation rate of 3.2% being applied for 209 consecutive years all at once. Some regulation of the amount of increase allowed in a year or over a period of time needs to be applied. 3. Financial Hardship - This increase will place an undue hardship on me. Like me, others in the Delaplain area are either single parents, elderly, people on fixed incomes, workers who haven't seen raises in years and others. A significant portion of us don't get an \$86.87 monthly raise – ever. Comparable sewer rates, even in cities that include water and garbage both in their costs are more like \$45/month. As rural customers, we pay over \$30/month for garbage service AND we pay for sewer costs separately. With this increase we would have a combined garbage/sewer bill of \$130/month, \$90 more than our peers. We have no city to advocate for us. And, since we are small, non-municipal systems, we are unlikely to receive state funds for system upgrades. 4. Lack of Diligence - It is not clear that Bluegrass Water Utility Water Operating Company, LLC has diligently looked to control costs or obtain multiple bids for proposed system improvements. 5. Excess Profit for a Public Utility - According to its letter dated 02/27/2023, Bluegrass Water Utility Water Operating Company, LLC states that it seeks to increase revenues by \$1,291,491 per year. They would recover their investment in only a few years; this is for systems with a life far beyond. This is too much burden to place on small residential customers. 6. Inadequate Records Access - In the filing per Case #2022-00432, many of the financial records of Bluegrass Water Utility Operating Company, LLC and their presumed attempts to justify the proposed rate increase are redacted. This makes it impossible for residents of Delaplain or their representatives to fully vet the claims of Bluegrass Water Utility Operating Company, LLC and properly challenge their outrageous, proposed rate increase of 694.9%. Thank you for your timely consideration of the concerns stated above regarding the proposed rate increase of 694.9% in residential sewer service for I-75/Delaplain residents like us. I look forward to your rejection of this outrageous request of Bluegrass Water Utility Operating Company, LLC per Case #2022-00432. Sincerely, Sheri H. Scott 130 Alexandra Jett Lane Georgetown, KY 40324

From: KY Public Service Commission Public Comments <psc.comment@ky.gov>

Sent: Thursday, March 23, 2023 11:15 AM

To: PSC Public Comment < PSC.Comment@ky.gov>

Subject: Public Comments for Case: 2022-00432 - Bluegrass Water Utility Operating Company, LLC

Public Comments for Case 2022-00432 submitted by

on Thursday, March

23, 2023 at 11:14 AM

Name: Sheri H Scott

Address: 130 Alexandra Jett Lane

City: Georgetown

State: KY

Zip Code: 40324

Phone number where you can be reached:

Home phone:

Comments: To: PSC Public Information Officer Psc.info@ky.gov From: Sheri H. Scott, 130 Alexandra Jett Ln., Georgetown, KY 40324 Subject: Request For Intervention Regarding Case # 2022-00432 To Whom It May Concern, I recently received a letter from Bluegrass Water Utility Operating Company, LLC dated February 27, 2023 indicating their application and request for adjustment of rates and approval of construction per PSC Case #2022-00432. My contact information is as follows: Sheri H. Scott 130 Alexandra Jett Lane Georgetown, KY 40324 I live in the I-75/Delaplain Exchange (Riffton Meadows) neighborhood, which as part of Case #2022-00432. Our neighborhood is facing a potential increase in Total Monthly Sewer - Single Residential service from \$12.50 per month to \$99.37 per month. This is a proposed monthly rate increase of 694.9%. I strongly request intervention regarding this case under the following grounds: 1. Power Imbalance/Monopoly/Market Failure – This is a private company, buying up sewer systems that provide a public good (sewer + environmental impact). Bluegrass Water speaks about costs/benefits, etc as if we had a market here. But, I have only one choice of where to get my sewer services. If they dramatically increase their revenue stream, they can sell this system for a profit based on years of higher rates extracted from me and my neighbors without assistance from state or local governments and outside a system of state and municipal grants. Systems owned by municipalities all over Kentucky are eligible for grants and are receiving grants, because they are facing many of the same repair issues that we are facing, related to providing clean water and living conditions. State and local taxes are available to assist them, but not available to assist me. Other systems, further out in the county (Mallard Point, etc) were acquired years ago by GMWSS. This is a course that enables their taxes to support maintenance and upgrade to their systems. I challenge the legitimacy of privatizing a system like this

that provides a public good, where the "buyers" have no recourse to seek better rates in the market and where the "seller" is free to seek an almost 7x increase. Our only advocate is the PSC. I want more government involvement in ensuring that the burden of these public matters do not fall unfairly to a subset of private systems without government grants and assistance that are available to other taxpayers and municipal systems. 2. Outrageous Amount of Increase - The proposed rate increase of 694.9% is totally outrageous and beyond reason. A recent report from energy gov showed that from 2008-2016, the average annual wastewater price escalation rate in the South-South East region, which includes the state of Kentucky, was 3.2% (U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy, Water and Wastewater Annual Price Escalation Rates For Selected Cities across the United States, September 2017). Based on this information, the proposed rate increase of 694.9% requested by Bluegrass Water Utility Operating Company, LLC would equate to the average annual wastewater price escalation rate of 3.2% being applied for 209 consecutive years all at once. Some regulation of the amount of increase allowed in a year or over a period of time needs to be applied. 3. Financial Hardship - This increase will place an undue hardship on me. Like me, others in the Delaplain area are either single parents, elderly, people on fixed incomes, workers who haven't seen raises in years and others. A significant portion of us don't get an \$86.87 monthly raise – ever. Comparable sewer rates, even in cities that include water and garbage both in their costs are more like \$45/month. As rural customers, we pay over \$30/month for garbage service AND we pay for sewer costs separately. With this increase we would have a combined garbage/sewer bill of \$130/month, \$90 more than our peers. We have no city to advocate for us. And, since we are small, non-municipal systems, we are unlikely to receive state funds for system upgrades. 4. Lack of Diligence - It is not clear that Bluegrass Water Utility Water Operating Company, LLC has diligently looked to control costs or obtain multiple bids for proposed system improvements. 5. Excess Profit for a Public Utility - According to its letter dated 02/27/2023, Bluegrass Water Utility Water Operating Company, LLC states that it seeks to increase revenues by \$1,291,491 per year. They would recover their investment in only a few years; this is for systems with a life far beyond. This is too much burden to place on small residential customers. 6. Inadequate Records Access - In the filing per Case #2022-00432, many of the financial records of Bluegrass Water Utility Operating Company, LLC and their presumed attempts to justify the proposed rate increase are redacted. This makes it impossible for residents of Delaplain or their representatives to fully vet the claims of Bluegrass Water Utility Operating Company, LLC and properly challenge their outrageous, proposed rate increase of 694.9%. Thank you for your timely consideration of the concerns stated above regarding the proposed rate increase of 694.9% in residential sewer service for I-75/Delaplain residents like us. I look forward to your rejection of this outrageous request of Bluegrass Water Utility Operating Company, LLC per Case #2022-00432. Sincerely, Sheri H. Scott 130 Alexandra Jett Lane Georgetown, KY 40324

From: PSC Public Comment
To:
Subject: RE: Bluegrass water

Date: Thursday, March 23, 2023 1:40:00 PM

Case No. 2022-00432

Thank you for your comments on the application of Bluegrass Water Utility Operating Company, LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2022-00432, in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2022-00432 (ky.gov)</u>

Thank you for your interest in this matter.

Sent: Thursday, March 23, 2023 11:31 AM

To: PSC Public Comment < PSC.Comment@ky.gov>

Subject: FW: Bluegrass water.

From: Office of Governor Beshear

Sent: Thursday, March 23, 2023 10:45 AM

>

Subject: Fwd: Bluegrass water.



Christine Louise Cox, Mar 22, 2023, 9:19 AM

Just wanted to know if the Governor knows that there's a water/waste company out here that is buying up small water and sewer companies, doing minimal if any upgrades and raising rates by up to 600% or more. Mine personally is supposed to go from 12.50 to 98\$. They have been doing this across the country. Is there anything that can be done? I don't have much faith in the Public Service Commission.

* * *

FirstName: Christine MiddleName: Louise LastName: Cox Address1: 136 Gemini Trl Address2: City: Georgetown

State: KY

ZipCode: 40324

County:

PhoneNumber:

Type: (assign form) Name: IP Address

Subject: Bluegrass water.

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Sincerely,