

June 6, 2025

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**PUBLIC SERVICE
COMMISSION**

Ms. Linda C. Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

Re: *Sandy Morrow vs. Garrard County Water Association, Inc.*, - **Case No.**
2024-00297

Dear Ms. Bridwell:

Enclosed, please find on behalf of Garrard County Water Association, Inc., an Answer to the Complaint in the above-styled case.

This is to certify that the Answer has been submitted to the Commission via email to PSCED@ky.gov and mailed via first-class mail with the U.S. Mail to the Complainant at the address listed on the complaint on this the 6th day June, 2025. No paper copies of this filing will be made with the Commission.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,



L. Allyson Honaker

Enclosure

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

SANDY MORROW)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2024-00297
GARRARD COUNTY WATER)	
ASSOCIATION, INC.)	
DEFENDANT)	

**GARRARD COUNTY WATER ASSOCIATION INC.'S
ANSWER AND MOTION TO DISMISS**

Comes now Garrard County Water Association, Inc. (“GCWA”), by counsel, pursuant to the Commission’s May 29, 2025 Order to satisfy or answer portions of the Complaint of Sandy Morrow (“Complaint” or “Ms. Morrow”) regarding the GCWA’s meter reader (in his capacity as meter reader), GCWA’s general manager and Ms. Morrow’s water pressure claims, and respectfully submits this Answer and moves the Commission to dismiss the Complaint with prejudice. In support of the Answer and Motion to Dismiss, GCWA respectfully states as follows:

I. BACKGROUND

Ms. Morrow filed a complaint with the Commission “alleging that an employee of Garrard County Water, in concert with her neighbor, engaged in fraudulent conduct that caused her[e] to waste money on unnecessary plumbing work that adversely affected her water service and resulted in low water pressure.”¹ In addition, “[s]he claimed that the employee, acting as meter reader for Garrard County Water, was unqualified and used his position as meter reader to set up the alleged

¹ Commission’s Order, p. 1.

fraudulent scheme, and, that when she reported the incident, the utility manager acted unreasonably in responding to the complaint.”² In addition, for the first time, Ms. Morrow claims to have low water pressure at her residence after this incident occurred. Ms. Morrow’s complaint, states as follows:

On Oct. 26 2023 I returned home and my next door neighbor (William (Bill Bryant) was waiting for me at my water meter. He had the steel drain off and he yelled at me to say “The water meter guy, Sammy was checking a meter up the road for a new home being built and they weren’t receiving much pressure so they came by each house and checking and that the water meter worker said I have a water leak.”³

Ms. Morrow goes on to state that her neighbor showed her the meter. She also stated that she questioned the neighbor as to why “the water employee didn’t leave a notice on my door or if he was coming back to make sure I knew.”⁴ Therefore, Ms. Morrow’s complaint admits that there was no communication with any GCWA employee about a leak, only her neighbor. There was no GCWA notice or other documentation left for Ms. Morrow. In fact, Ms. Morrow’s complaint states that her neighbor “soon came to me with a phone number and said to call this plumber and he will give me a good deal and that he was a licensed plumber one he has known him all of his life.”⁵ Therefore, Ms. Morrow admits that she contacted a plumber, not a person in their capacity as a GCWA employee. In fact, she at no time spoke to a GCWA employee during the entire time that she had repairs performed at her home. She only spoke to an employee after the repairs were made to inform them that it was complete. The water company employee that Ms. Morrow spoke with informed her that it did not appear that she had a leak. Ms. Morrow then went to GCWA an

² *Id.*

³ Complaint p. 1.

⁴ *Id.*

⁵ *Id.*

spoke to the general manager, Sean Smith. Mr. Smith informed Ms. Morrow that they contract out the meter reading and that a meter reader, acting on behalf of GCWA would not be checking the meters for leaks. Mr. Smith also informed Ms. Morrow that the person who did the excavation work for Ms. Morrow is a person that GCWA uses to read meters, but that he would not have been putting in a meter at a new home or checking other meters for leaks in his capacity as a meter reader for GCWA. He would have been doing those things on behalf of his own company. Mr. Smith also informed her that no one on behalf of GCWA informed her of a leak, or performed any work on her property. Ms. Morrow did not like this response and wanted her money back that she had spent on repairs. According to Ms. Morrow's complaint she didn't even know that the person who performed the repairs was the same person that allegedly spoke to her neighbor about a water leak, which is further indication that Ms. Morrow did not speak to an employee or contractor working on behalf of GCWA prior to having repairs completed at her home. Mr. Smith advised Ms. Morrow that this appears to be a dispute between Ms. Morrow, her neighbor and the excavator and does not involve GCWA.

Once GCWA received the Commission's May 29, 2025 Order, Mr. Smith noticed the allegation of low water pressure by Ms. Morrow, which had not been brought to GCWA's attention prior. GCWA checked Ms. Morrow's water pressure at her meter and it registered at 98%, which is excellent pressure. A copy of the picture taken of Ms. Morrow's meter when the pressure was checked on May 30, 2025 is attached as Exhibit A.

II. ANSWER AND REQUEST FOR DISMISSAL

KRS 278.260 grants the Commission jurisdiction over complaints regarding the rates and services of a utility. 807 KAR 5:001, Section 20(1)(c) requires that a complaint fully, clearly, and with reasonable certainty state the act or omission the utility is alleged to have violated. Nothing

in the complaint filed by Ms. Morrow states an act or omission by GCWA. Ms. Morrow alleges inappropriate conduct on behalf of her neighbor and a plumber she called to do repairs, that happened to be a contract meter reader for GCWA. Nothing in Ms. Morrow's complaint alleges that any information regarding a water leak was conveyed to her by GCWA or anyone on behalf of GCWA. She alleges her neighbor informed her of a water leak, that there was no notice from GCWA and she did not contact GCWA prior to performing the repairs. For these reasons, the Complaint should be dismissed for failing to provide a prima facie case that GCWA violated any statute or regulation.⁶

However, if the Commission believes Ms. Morrow has stated a prima facie case, the Complaint should still be dismissed because the evidence provided in this Answer demonstrates that GCWA has not violated any statute or regulation. Additionally, the Complaint fails to set forth any claim upon which relief can be granted by the Commission. GCWA has provided evidence of the excellent water pressure at Ms. Morrow's meter. If there are any water pressure issues, it would be on Ms. Morrow's side of the meter and not an issue for which GCWA is responsible. Ms. Morrow has not provided any information that she was informed of a water leak by GCWA or anyone in their capacity as an employee or contractor of GCWA. She also provides no evidence that she requested a pressure check on her meter. Her only allegation against a GCWA employee, acting in their capacity as a GCWA employee is that she did not like the response given to her by the general manager, Sean Smith, when he tried to explain to her that a GCWA employee or contractor would not have been checking her meter for a leak while reading the meter and that the excavator was not acting in his capacity as a GCWA contracted meter reader when she called

⁶ 807 KAR 5:001, Section 20(4)(a)(1)-(2).

his personal business to perform repairs. GCWA is not responsible for the things its employees or contractors do when they are not on the clock for GCWA.

GCWA does not have sufficient knowledge of the alleged facts stated in the complaint regarding Ms. Morrow's interaction with her neighbor or the excavator (since there are no allegations in the complaint against the excavator in his capacity as a meter reader for GCWA to the extent the Commission believes there are allegations in this capacity, GCWA denies same). and therefore denies all of those allegations. GCWA also denies the allegations against the general manager and the insufficient water pressure. GCWA does not agree with the alleged facts regarding the general manager, and does not have sufficient information to know whether or not Ms. Morrow's water pressure is low in her home since the water pressure at her meter is excellent.

Any allegations not specifically admitted in this Answer are denied. GCWA requests the Commission to dismiss Ms. Morrow's complaint against GCWA.

WHEREFORE, on the basis of the foregoing, GCWA respectfully requests the Commission to dismiss the Complaint with prejudice and the matter be closed and removed from the Commission's docket.

This 6th day of June, 2025.

Respectfully submitted,



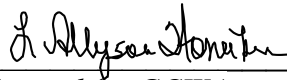
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CERTIFICATE OF SERVICE

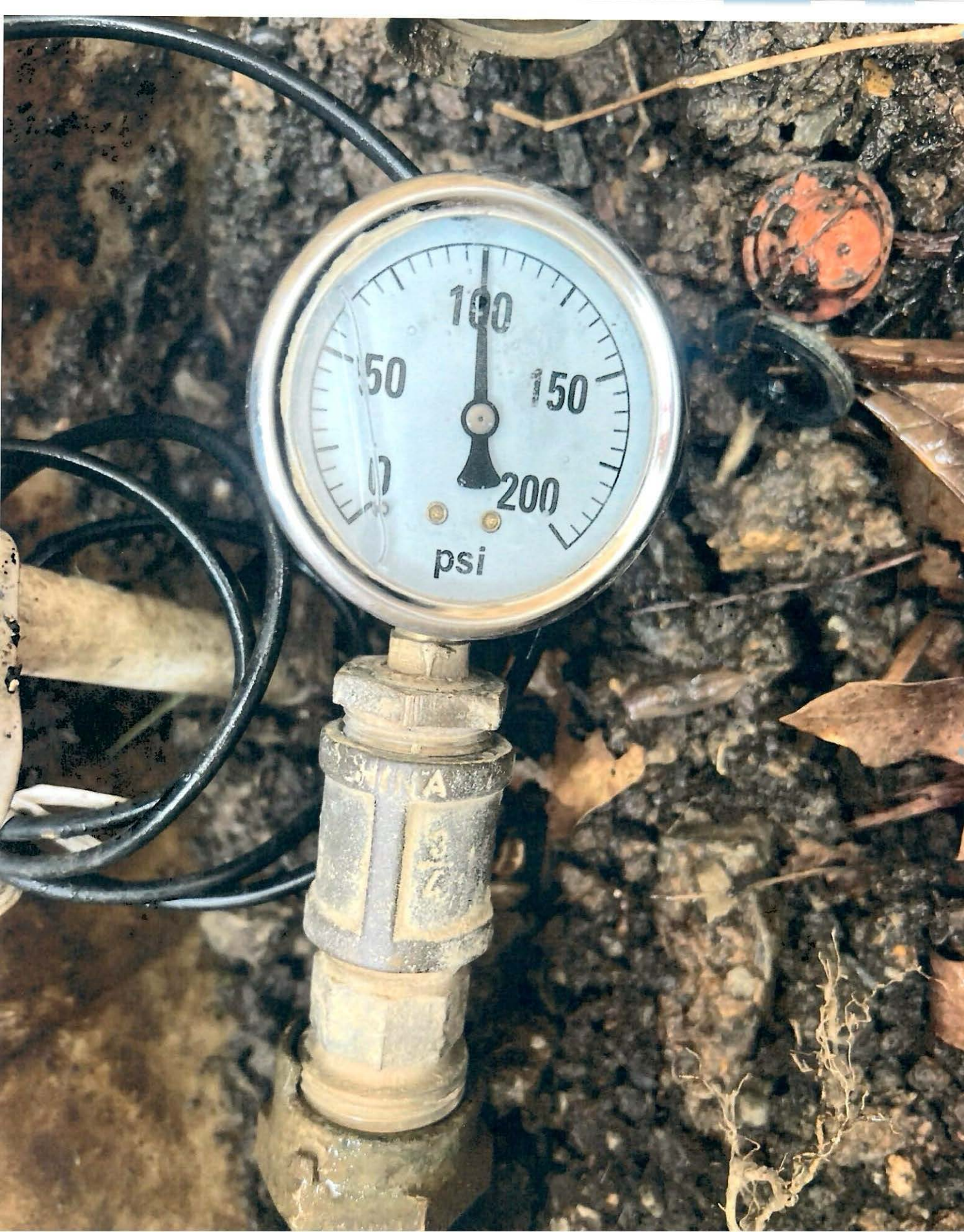
This is to certify that true and accurate copy of the foregoing has been emailed to the Kentucky Public Service Commission at PSCED@ky.gov. In addition, a true and accurate copy of the foregoing was placed in the U.S. mail, postage prepaid, on June 6, 2025 addressed to the following:

Sandy Morrow
1274 Bryant's Camp Road
Lancaster, KY 40444



Counsel for GCWA

EXHIBIT A
WATER PRESSURE READING



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