



Kentucky Public Service Commission ATTN: Public Information Officer PO Box 615 // Frankfort, KY 40602

RE: Public Comment for Case # 2025-00293

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PUBLIC SERVICE COMMISSION

- Doe Valley Association (DVA) purchases bulk water from Meade County Water District (MCWD) to charge our storage tanks and transmission lines, approximately 6 million gallons per month. MCWD has consistently issued rate increases to DVA in the range of 1%-6% per year and DVA has never protested rate increases consistent with inflationary costs.
- MCWD purchases 100% of its potable water from Hardin County Water District (HCWD) #1.
 It is critical to consider the costs of this bulk water purchased from HCWD #1 have not increased since the last rate increase was granted by the Kentucky Public Service Commission (PSC) in March 2025 and are not scheduled to increase in 2025/2026.
- 3. MCWD now proposes a 27% across-the-board rate increase for all customers of the public utility. DVA protests this proposed rate increase for our bulk water purchases for these specific reasons:
 - a. The rate increase is not remotely reflective of inflationary necessity. Inflation rates are currently 2-4% and the proposed 27% rate increase seems significantly excessive.
 - b. Rates charged by HCWD #1 are not scheduled to increase in 2026.
 - c. As a bulk customer for this water, DVA must bear the costs of maintaining and repairing our own pumps, water towers, and water lines. These operational costs are not borne by MCWD. As such, the rate of increase for bulk customers should be much less percentagewise than for individual customers, for whom MCWD must maintain, extend, and improve pumps, water storage, and water transmission lines throughout the county. Increased costs associated with bulk water delivery should be reflective of the increased costs borne by MCWD for purchasing and delivering that same water from HCWD #1.
 - d. Since the bulk water price MCWD pays to HCWD #1 is not increasing, we request a formal justification for increasing bulk water rates by 27%. The administrative and operational costs of running MCWD should be borne by the individual customers of MCWD, not shared equally by a bulk water customer such as DVA. If MCWD wishes



- to increase rates for DVA members at the same rate as their own customers, MCWD should assume control of DVA's water distribution and add approximately 1000 customers to its base overnight. DVA remains open to this eventuality.
- e. Actually, individual DVA members already pay a higher rate for their delivered potable water than individual MCWD customers.
- 4. In KYPSC Case # 2025-00029, dated 11 March 2025, Page 5, Sub-Paragraph 5, the PSC ordered "On or before August 31, 2025, Meade District shall file an application for a general rate adjustment..." To comply with your order, we assume MCWD hired the Kentucky Rural Water Association (KRWA) to provide a detailed study of the various rates and tariffs charged by MCWD. DVA is not in receipt of this study nor did DVA provide data, perspective, or analysis to complement the work of KRWA. However, we think it reasonable to assume the KRWA study should have:
 - a. Conducted a comprehensive analysis of current water rates and usage patterns.
 - b. Evaluated operational costs, including maintenance and infrastructure investments.
 - c. Compared rates with neighboring utilities to ensure competitiveness.
 - d. Engaged with community stakeholders for feedback and transparency.
 - e. Explored alternative funding sources, such as grants or state assistance.
 - f. Implemented tiered pricing structures to encourage conservation and fairness.
- 5. DVA believes KRWA should have consulted with DVA the 2d largest provider of potable water in Meade County on our own rates to ensure it more effectively understood the relative rates paid by individual customers of MCWD and DVA and to consider how the delivered bulk price of water could increase at the same rate with delivered water to individual customers. We believe this engagement would have proven invaluable to their study and cost analysis and would have better informed their conclusions, as well as provided for reasonable feedback and community transparency.

6. DVA formally protests this proposed 27% bulk water rate increase and requests PSC relief.

Respectfully submitted,

Eddie Bohannon

General Manager, DVA

On behalf of the Board of Directors, DVA

CC: Doe Valley Board of Directors

CC: Doe Valley Association Members