

Public Comments Received for Case Number: 2025-00354
Response Monday, December 29, 2025

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, 2025-00354 in any further correspondence.

The documents in this case are available at: [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Received through Public Comments

Friday, December 26, 2025

From: Denise
City: Georgetown
State: KY
Zip: 40324

Comments:

I live in Longview in Georgetown BWUOC purchased our sewer system. Since the purchase there has been an extremely sharp increase in cost to \$77mo with no improvement done. They are also requesting a new charge to \$114 a month for sewer alone. I'm a one person household in a small home paying the same amount as larger homes with multiple people living in them. It should be billed by usage like the water company. I was initially paying around \$32 mo until this company started gouging everyone!!! Please stop them!!! My (total electric) home electric bill is \$128!! This is unfair inequitable charging us this cost for sewer we are paying for improvements they are doing in Texas!!! The first increase at that rate was unlawful should've never been allowed!! Please help the people affected by this stop this increase. Thank you.

From: [PSC Public Comment](#)
To: "Veronica Allen"
Subject: RE: Bluegrass Water Utility Operating Company, LLC in Case No. 2025-00354.
Date: Monday, December 29, 2025 8:47:00 AM

Case No. 2025-00354

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, 2025-00354 in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Veronica Allen [REDACTED]
Sent: Tuesday, December 23, 2025 8:34 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Bluegrass Water Utility Operating Company, LLC in Case No. 2025-00354.

To the Kentucky Public Service Commission:

I am writing to formally oppose the requested sewer rate increase by Bluegrass Water Utility Operating Company, LLC in Case No. 2025-00354.

Just in the last 5 years, my sewer rates have risen dramatically—from approximately \$35 to the currently requested \$114 per month. This increase is excessive and does not reflect the level of service provided or the cost of living in our area.

Key concerns:

Frequent Rate Hikes: Residents have faced repeated rate increases every 18–24 months, forcing us to continually fight for affordable rates.

Lack of Improvements: Despite previous hikes, there is little evidence of promised infrastructure repairs. Issues like foul sewer odors and rare utility truck visits persist.

Financial Burden: The proposed \$114 monthly bill is unaffordable for many, especially seniors and families on fixed incomes. Meanwhile, corporate overhead appears to be growing.

Need for Accountability: Before any further rate hikes are approved, there must be transparency and an independent audit of how previous rate increase revenues were spent.

We are a captive audience with no alternative for sewer service. I respectfully request that you deny the proposed increase and demand a full, independent audit before considering any further rate adjustments.

Sincerely,

Veronica Allen

[REDACTED], Georgetown Ky 40324

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: Case# 2025-00354
Date: Monday, December 29, 2025 8:48:00 AM

Case No. 2025-00354

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, 2025-00354 in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: [REDACTED]
Sent: Tuesday, December 23, 2025 8:40 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Case# 2025-00354

[REDACTED]

[REDACTED]

Attached is a letter to the Public Service Commission regarding the Bluegrass Water Utility Operating Company.

December 23, 2025

Case # 2025-00354

Re: Bluegrass Water Utility Operating Company LLC proposed rate adjustment

To Whom This Concerns:

The purpose of this letter is to confirm my disappointment and displeasure with Bluegrass Water Operating Company. I have received a letter from them stating that they are proposing a rate increase of water utilities by 36.7%. This type of practice is especially in a water district that has many people living from paycheck to paycheck or on a government supported program.

Since the ownership of Bluegrass Water Operating Company several years ago, they have done a satisfactory job to ensure families have clean water. I feel that if they want to gain support from their water district, I might suggest that they place water meters at each home to get an accurate account of water used. Currently, the rate would be the same if one gallon of water was used versus 500,000 gallons of water per month. When I moved to this area in 2015, the infrastructure was poor, but it had a flat rate of \$34.00 per month. When Bluegrass Water Utility Operating Company took ownership, the rate went to \$77.63 and now, they are asking for \$106.12. I find this rate to be totally unacceptable and urge the Public Service Commission to decline this proposal. There is no suggestion for a discussion or town meeting regarding this increase. These rate increases will result in surpassing my cable and electrical utility bill each month.

I am confident that many families have submitted their displeasure on this issue already. Our Center Ridge Water District 2 KY0180509 district has experienced a boil water advisory twice in the last two weeks in zip code 42076. Please contact me if you should have further questions regarding this matter.

Sincerely,



Al Chapman



From: [PSC Public Comment](#)
To: [REDACTED]
Subject: Re: Comment for Case 2025-00354
Date: Monday, December 29, 2025 8:49:00 AM

Case No. 2025-00354

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, 2025-00354 in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Alex Freeman [REDACTED]
Sent: Tuesday, December 23, 2025 5:54 PM
To: PSC Consumer Inquiry [REDACTED]
Subject: Comment for Case 2025-00354



I'm writing to submit another public comment on case 2025-00354

Again, I fully oppose the recent application for the rate increase Bluegrass Water is proposing.

After looking at some of the documents they have provided, I have some serious concerns on where the money is going. Attached are a couple screenshots of those documents.

I live in Arcadia Pines Subdivision and can't speak for the other neighborhoods about the state of their lagoons.

First, the letter from Mr. Mitten stating they have invested \$111,000 into our lagoon and all the "upgrades" they say they have done, including adding an access road. I recently sent pictures to the Attorney General's office with the current state of our pond and lack of visible upgrades or repairs and the missing access road. I drive by the pond everyday and even before they took over ownership. They did however, add a remote monitoring station. Also provided is a document (G703) stating they've only done \$121 of repairs to the fence. Again, there has only been a little sign added to the fence stating it is the property of Bluegrass Water.

Second, the amount of connections in our subdivision is listed at 25. There are 32 homes connected to the pond, 7 houses have never received a bill and they have lived here just as long as me (5 years). Why do they not have a bill?

Third, there is a cost associated to our neighborhood regarding a 1/2 HP Disc Sewage Pump. There is no mechanical operations in our lagoon. It is all gravity fed. Who knows if they are adding items like this into other neighborhoods trying to "fix the books."

I bring this up because my neighbors and I can attest to there NEVER being any work done when they state they have done significant upgrades. Before considering any form of rate increase, there should be a full audit of this company's practices.

The rate increase should be denied and any other increase they propose. I hope you can use these documents that have been submitted by Bluegrass Water and the first hand information provided by one of its customers.

Please do the right thing and help the consumer.

Respectfully,
Alex Freeman

CONTINUATION SHEET

AIA DOCUMENT G703

PAGE 2 OF 2 PAGES

AIA Document G702, APPLICATION AND CERTIFICATION FOR PAYMENT, containing Contractor's signed certification is attached.

In tabulations below, amounts are stated to the nearest dollar.

Use Column I on Contracts where variable retainage for line items may apply.

APPLICATION NO: 26

APPLICATION DATE: December 31, 2022

PERIOD TO: 12/31/22

CONTRACTOR'S PROJECT NO:

A	B	C	D	E	F	G		H	I
ITEM NO.	DESCRIPTION OF WORK	SCHEDULED VALUE	WORK COMPLETED		MATERIALS PRESENTLY STORED (NOT IN D OR E)	TOTAL COMPLETED AND STORED TO DATE (D+E+F)	%(G ÷ C)	BALANCE TO FINISH (C - G)	RETAINAGE (IF VARIABLE RATE)
			FROM PREVIOUS APPLICATION (D + E)	THIS PERIOD					
1	Arcadia Pines WW General Plant Fence repair Access Road Treatment and Disposal Repair berm and drain field	\$5,000.00 \$5,000.00 \$25,000.00	\$121.00	\$0.00 \$0.00 \$0.00		\$121.00	2.42%	▲ ▲ \$4,879.00 \$5,000.00 ▲ ▲ ▲ ▲ ▲	\$0.00 \$0.00 ▲
	GRAND TOTALS	\$35,000.00	\$121.00	\$0.00	\$0.00	\$121.00	0.35%	▲	▲

1 of 3

DR 28 & 29: Customer Breakdown by Classification

Commercial	5	5
KY-Delaplain	3	3
KY-Delaplain Com Sewer	3	3
KY-Persimmon Ridge	1	1
KY-Bluegrass Com Sewer	1	1
KY-Springcrest	1	1
KY-Bluegrass Com Sewer	1	1
Residential	2353	2353
KY-Airview	203	203
KY-Bluegrass Res Sewer	203	203
KY-Arcadia Pines	25	25
KY-Bluegrass Res Sewer	25	25

353	KY-Arcadia Pines-WW	Acquisition - Closing Costs	12/31/20
353	KY-Arcadia Pines-WW	Acquisition - Land Rights - Lagoon	12/31/20
354	KY-Arcadia Pines-WW	Fence Modification	7/31/23
360	KY-Arcadia Pines-WW	Collection Sewers - Force	1/31/21
361	KY-Arcadia Pines-WW	Acquisition - Gravity Sewer & Manholes	12/31/20
361	KY-Arcadia Pines-WW	Acquisition - Legal & Engineering	6/30/21
363	KY-Arcadia Pines-WW	Acquisition - Laterals	12/31/20
371	KY-Arcadia Pines-WW	1/2 HP 2 disc sewage pump	1/1/25
380	KY-Arcadia Pines-WW	Acquisition - Water Treatment Plt	12/31/20
396	KY-Arcadia Pines-WW	High Tide	7/1/25
396	KY-Arcadia Pines-WW	High Tide	6/1/25



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BLUEGRASS WATER
Utility Operating Company
A - SGR Managed Utility

September 23, 2025

SENT VIA EMAIL (heather.napier@ky.gov)

Ms. Heather Napier
Consumer Complaint Investigator II
Office of the Attorney General
Rate Intervention
1024 Capital Center Drive, Suite 20
Frankfort, KY 40610

Re: Complaint No.: 1358 - Mr. Alex Freeman, 1165 Red Pine Circle, West Paducah, KY 42086

Ms. Napier:

The complaint your office received from Mr. Alex Freeman has been referred to me for response. I believe this response covers each of the items identified in your September 15, 2025, email. However, if I missed something or if you (or Mr. Freeman) require additional information, please let me know.

The form referenced on Sheet 28 of Bluegrass Utility Operating Company's ("Bluegrass") approved tariff does not apply to residential customers like Mr. Freeman. As stated on Sheet 27 of the tariff, that form applies to commercial and industrial customers served by Bluegrass's Delaplain sewer system in Scott County. Only those customers received and are required to complete the form. We believe all customers required to submit the form have done so, and the information provided has been duly processed. All capital and operating costs related to commercial and industrial customers served by the Delaplain system were properly recorded on Bluegrass's books and duly considered by regulators in setting the company's service rates.

At the time of its acquisition, the Arcadia Pines sewer collection and treatment system did not require significant upgrades or improvements. However, since its acquisition Bluegrass has installed a new access road and remote monitoring equipment, repaired fencing (to prevent unauthorized access to the plant), repaired the leaking lagoon berm, made improvements to the effluent drain field, and repaired significant rodent damage to the facility. No specific future improvements to the Arcadia Pines system are currently planned, but the company is committed to expending whatever funds are necessary to ensure the system operates in a manner that complies with all applicable health, safety, and environmental laws and provides safe and reliable service to customers. To date, Bluegrass has invested approximately \$111,000 in the Arcadia Pines system, which includes acquisition costs, capital improvements, and working capital. Statewide, the company's investment in all its water and wastewater systems is approximately \$15 million.

To the company's knowledge, all customers served by the Arcadia Pines sewer system have been regularly and appropriately billed since Bluegrass acquired the system. Bills are sent to specific customers at specific addresses; no bills are sent to "Current Resident" as Mr. Freeman alleges. And although Bluegrass acknowledges that customers sometimes fail to pay their bills, for reasons of confidentiality the company cannot disclose to Mr. Freeman the payment history of any other customer served by the Arcadia Pines system.

Regarding Mr. Freeman's desire for a written service agreement. Bluegrass's tariff, which was approved

by the Kentucky Public Service Commission, constitutes the company's "contract" with its customers. All terms of service, rates, and applicable charges are set out in the tariff, which is accessible through a link provided on the company's website (www.bluegrasswateruoc.com). The website's IP address, a customer service email address, and a contact telephone number are included on each monthly customer bill as well as on the system-

specific *Community Update* Bluegrass periodically provides its customers. A copy of the most recent Arcadia Pines *Community Update* accompanies this response.

Finally, Bluegrass is aware of the location of all sewer mains in the Arcadia Pines system.

If you have further questions regarding this matter, please direct them to the undersigned. My email address is [REDACTED]

Very truly yours,

A handwritten signature in blue ink, appearing to read "Russ Mitten", with a long horizontal flourish extending to the right.

Russ Mitten
General Counsel

From: [PSC Public Comment](#)
To: ["Rodney Eversole"](#)
Subject: RE: Case number 2025-00354
Date: Monday, December 29, 2025 8:49:00 AM

Case No. 2025-00354

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, 2025-00354 in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Rodney Eversole [REDACTED]
Sent: Thursday, December 25, 2025 9:45 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Case number 2025-00354

[REDACTED]

[REDACTED]

Virgil and Terry Eversole

[REDACTED]

Georgetown KY, 40324

I'm sending this email to oppose the rate increase Bluegrass water wants. They bought Delaplain out several years ago and was able to get a rate increase from \$12.50 to \$77.77 a month. This was a huge rate increase and now they want to increase it to \$114.00 a month. This is NOT water it is sewer only. I've tried to find an alternate solution but I've not had luck. I feel like I have no other choice. This will make a difference in my monthly bills. My mom and mother in law both live in their service area. This will cause a hardship on them. They are both on social security. This will be about 7-8 percent of their

monthly check. This is not the only bill they have to pay. I thought \$12.50 to \$77.00 was gouging but this is not right. I hope when you review this that you will consider the elderly who will have to pay this increase.

When I called the Public Service Commission I was informed that the letter had to have a case number on it. The lady I spoke to gave me the number to put on my complaint. I could not find a case number on the letter that Bluegrass Water sent. I feel like if I had not called PCS my letter would not have got to the right department or been considered.

Thank you for your time.

Case number 2025-00354



BLUEGRASS WATER

Utility Operating Company

A CSWR Managed Utility

12/11/2025

Dear Customer:

We are writing to update you on the wastewater services that serve your community.

Since purchasing the wastewater system that serves you, Bluegrass Water Utility Operating Company, LLC (Bluegrass Water) has invested nearly \$18.6 million in Kentucky communities to ensure that you, your families and your neighbors have access to clean, safe and reliable wastewater resources. The infrastructure upgrades to the wastewater system serving you may include installation of remote monitoring equipment to assure facilities are closely tracked and working properly at all times; sewer plant improvements to ensure proper treatment including flow equalization, replacement of blowers, pipes, and diffusers in aeration tankage, and many more necessary repairs. As a result of these efforts and additional improvements planned, Bluegrass Water expects to submit a request on December 11, 2025 to the Kentucky Public Service Commission (PSC) for a general adjustment of rates charged for service in order to increase annual wastewater operating revenues by \$2,669,423.86.

Please take notice of the following information about the proposed rate adjustment that is presented below:

The rates contained in this notice are the rates proposed by Bluegrass Water, but the PSC, the state agency that regulates all utility services in Kentucky, may order rates to be charged that differ from the proposed rates found in this notice. The Company has proposed raising residential rates from the present rate of \$77.77 to the proposed rate of \$114.00, which represents an increase of \$36.23 or 46.6% and also represents the effect upon the average bill for residential customers. The Company has also proposed raising the non-residential minimum charge from \$197.43 to \$285.00 which represents an increase of \$87.57 or 44.4%. The non-residential usage charge has been proposed to increase from \$11.67 per 1,000 gallons to \$55.86 per 1,000 gallons representing an increase of \$44.19 or 378.7%. The date the proposed rates are expected to be filed with the PSC is 12/11/2025; the proposed effective date of the rates is for service rendered on and after 1/31/2026. For the non-residential Delaplain customers, the average customer usage is 86,879 gallons and the effect the proposed rate will have on the average bill for each customer is an increase of \$3,926.86 or 324.2%.

You may examine Bluegrass Water's application at the offices of Dinsmore & Shohl LLP, 101 South Fifth St., Suite 2500, Louisville, KY 40202. If you would like to make prior arrangements to view the application at Dinsmore & Shohl LLP, please contact (866) 752-8982 or support@bluegrasswateruoc.com. Bluegrass Water's application may also be examined at the PSC's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., or through the commission's Web site at <http://psc.ky.gov>. Comments regarding the application may be submitted to the PSC through its Web site or by mail to:

Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602.

You may submit a timely written request for intervention to the PSC, establishing the grounds for the request including your status and interest in the proceeding, by mail to:

Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602.

If the PSC does not receive a written request for intervention within thirty (30) days of the mailing of this notice, the PSC may take final action on the application.

Josiah Cox

President

Bluegrass Water Utility Operating Company, LLC

From: [PSC Public Comment](#)
To: [manuel jimenez](#); [PSC Public Comment](#); [Hampton, Tony \(State Rep.\) \(LRC\)](#); [Nunn, Matt \(State Sen.\) \(LRC\)](#)
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC
Date: Monday, December 29, 2025 8:50:00 AM

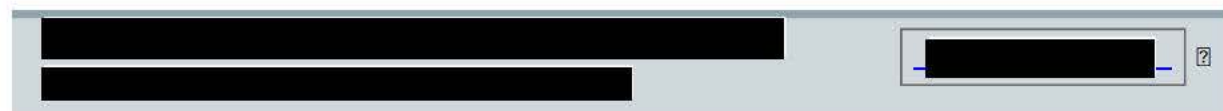
Case No. 2025-00354

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 Public Comments portion of the case file for the Commission's consideration. Please cite the case number in this matter, 2025-00354, in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Individuals or entities seeking to become a party to an administrative case before the Commission shall comply with 807 KAR Title 5, including the filing requirement set forth in 807 KAR 5:001. Tendered documents that fail to comply with applicable filing requirements may be treated as public comments.

Thank you for your interest in this matter.

From: manuel jimenez [REDACTED]
Sent: Saturday, December 27, 2025 10:42 AM
To: PSC Public Comment <PSC.Comment@ky.gov>; Hampton, Tony (State Rep.) (LRC) [REDACTED]; Nunn, Matt (State Sen.) (LRC) [REDACTED]
Subject: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC



Manuel Edwardo Jimenez
[REDACTED]
Georgetown, KY 40324

Date: December 27th, 2025

Kentucky Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company,

LLC

Proposed Wastewater Rate Adjustment (Filed December 11, 2025)

Dear Senator Nunn, Representative Hampton, and Commissioners:

Pursuant to **KRS 278.260**, and the Commission's statutory duty to ensure that utility rates are **fair, just, reasonable, and non-discriminatory**, I hereby submit this formal request for intervention in the above-referenced proceeding.

I am a residential customer of Bluegrass Water Utility Operating Company, LLC ("Bluegrass Water") residing in a **4-family** household with low and consistent wastewater usage. The proposed residential rate increase of approximately **46.6%** is excessive, inequitable, and unsupported by proportional cost causation, and therefore violates both **KRS Chapter 278** and long-standing Kentucky precedent.

Statutory Violations

Under **KRS 278.030(1)**, utility rates must be "fair, just, and reasonable," and utilities are prohibited from charging rates that are unjustly discriminatory. Additionally, **KRS 278.170(1)** prohibits utilities from subjecting any customer or class of customers to unreasonable disadvantage.

The proposed increase relies heavily on inflated minimum charges that disconnect the price paid from actual wastewater usage. As a result, low-usage residential customers such as myself are forced to subsidize costs unrelated to their contribution to system demand, placing us at an unreasonable disadvantage in violation of statute.

Kentucky Case-Law and PSC Precedent

Kentucky courts have repeatedly affirmed that utilities bear the burden of proving that proposed rates are reasonable and properly allocated:

- In **Kentucky Industrial Utility Customers, Inc. v. Public Service Commission**, the Kentucky Supreme Court held that the Commission must ensure rates are supported by substantial evidence and are not excessive or unfairly allocated among customer classes.
- In **Cincinnati Bell Telephone Co. v. Public Service Commission**, the Court reaffirmed that rates must reflect a rational relationship between cost causation and customer charges, and that the PSC has a duty to protect consumers from unreasonable rate designs.
- The Commission has further recognized in numerous rate orders that **minimum charges must be narrowly tailored** and may not be used to impose disproportionate costs on customers who do not materially drive system expenses.

Collectively, this precedent establishes that rate structures which obscure cost responsibility, penalize conservation, or impose excessive burdens on low-usage customers are inconsistent with Kentucky law.

Failure of Proof and Public Interest Concerns

While infrastructure investment may be a legitimate utility objective, Kentucky law is clear that:

- Costs must be **prudently incurred**;
- Rate impacts must be **reasonably distributed**; and
- Utilities must demonstrate that **less burdensome alternatives** have been fully considered.

Bluegrass Water has not met this burden. A nearly 50% increase in wastewater rates for an essential service—without adequate usage-based justification—would be confiscatory in effect for small households and contrary to the public interest the Commission is charged with protecting under **KRS 278.040(2)**.

Request for Relief

For the foregoing reasons, I respectfully request that the Commission:

1. Grant this request for intervention pursuant to **KRS 278.260**;
2. Require Bluegrass Water to submit detailed cost-of-service and rate-design justification;
3. Reject or substantially reduce the proposed residential rate increase; and
4. Direct the utility to develop a rate structure consistent with Kentucky statutory and case law.

Please confirm receipt of this request and include me on the service list for all future filings in this matter.

Respectfully submitted,

Manuel Edwadro Jimenez

From: [PSC Public Comment](#)
To: "Patrice Jimenez"; [PSC Public Comment](#); [Nunn, Matt \(State Sen.\) \(LRC\)](#); [Hampton, Tony \(State Rep.\) \(LRC\)](#)
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC Proposed Wastewater Rate Adjustment (Filed December 11, 2025)
Date: Monday, December 29, 2025 8:51:00 AM

Case No. 2025-00354

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 Public Comments portion of the case file for the Commission's consideration. Please cite the case number in this matter, 2025-00354, in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Individuals or entities seeking to become a party to an administrative case before the Commission shall comply with 807 KAR Title 5, including the filing requirement set forth in 807 KAR 5:001. Tendered documents that fail to comply with applicable filing requirements may be treated as public comments.

Thank you for your interest in this matter.

From: Patrice Jimenez [REDACTED]
Sent: Saturday, December 27, 2025 10:42 AM
To: PSC Public Comment [REDACTED]; Nunn, Matt (State Sen.) (LRC)
[REDACTED]; Hampton, Tony (State Rep.) (LRC)
[REDACTED]
Subject: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC Proposed Wastewater Rate Adjustment (Filed December 11, 2025)

[REDACTED] [REDACTED]

Patrice Jimenez
[REDACTED]
Georgetown, KY 40324

Date: 12/27/2025

Kentucky Public Service Commission

Post Office Box 615
Frankfort, Kentucky 40602

Re: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC
Proposed Wastewater Rate Adjustment (Filed December 11, 2025)

Dear Senator Nunn, Representative Hampton, & Commissioners:

Pursuant to KRS 278.260, and the Commission's statutory duty to ensure that utility rates are fair, just, reasonable, and non-discriminatory, I hereby submit this formal request for intervention in the above-referenced proceeding.

I am a residential customer of Bluegrass Water Utility Operating Company, LLC ("Bluegrass Water") residing in a 4-person household with low and consistent wastewater usage. The proposed residential rate increase of approximately 46.6% is excessive, inequitable, and unsupported by proportional cost causation, and therefore violates both KRS Chapter 278 and long-standing Kentucky precedent.

Statutory Violations

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Utilities must demonstrate that less burdensome alternatives have been fully considered.

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Reject or substantially reduce the proposed residential rate increase; and
Direct the utility to develop a rate structure consistent with Kentucky statutory and case law.

Please confirm receipt of this request and include me on the service list for all future filings in this matter.

Respectfully submitted,

Patrice Jimenez

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: 2025-00354
Date: Monday, December 29, 2025 8:52:00 AM

Case No. 2025-00354

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, 2025-00354 in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: [REDACTED]
Sent: Friday, December 26, 2025 11:01 AM
To: PSC Consumer Inquiry [REDACTED]
Subject:

[REDACTED]

[REDACTED]

Wiglesworth Farms, LLC



Georgetown, KY 40324

12/26/25

To: PSC

From: Jerry Wiglesworth, Owner

Re: proposed Bluegrass Water Rate Increase

On 12/24/25, I received the attached letter dated 12/11/25, notifying me that they are proposing a very substantial rate increase for 2026 to an already ridiculously high rate.

Attached are my costs for water from Ky American Water and costs for sewage from Bluegrass Water for the period of 1/1/24 thru 12/31/25 and sewage cost for period 1/1/22 thru 12/31/23.

As you can see the current rate is 4.75 times higher than my water bill and the proposed rate would be 6.86 times higher than water bill.

Also, the proposed rate would be 4.54 times higher than the rate for the two years prior to the expansion of the sewage system.

I have a small business that doesn't use a lot of water therefore these increases have placed a financial burden on me and request some adjustment based on the usage for myself and any other small businesses like mine.

A Common Sense approach when considering any proposed rate increase would be greatly appreciated and hopefully denied. After all, the work has only been completed two years. Seems a little earl to be asking for a rate increase and especially one of that magnitude.

10:02 AM

12/25/25

Accrual Basis

Wiglesworth Farms LLC Register QuickReport January 2024 through December 2025

Type	Date	Num	Memo	Account	Clr	Split	Amount
Bluegrass Water UOC, Inc.							
Check	01/15/2024	5450		Stock Yards Ban...		Sewage 410 ...	-284.93
Check	02/13/2024	5467		Stock Yards Ban...		Sewage 410 ...	-295.53
Check	03/14/2024	5487		Stock Yards Ban...		Sewage 410 ...	-255.54
Check	04/12/2024	5514		Stock Yards Ban...		Sewage 410 ...	-253.91
Check	05/14/2024	5532		Stock Yards Ban...		Sewage 410 ...	-286.40
Check	06/11/2024	5556		Stock Yards Ban...		Sewage 410 ...	-249.46
Check	07/13/2024	5574		Stock Yards Ban...		Sewage 410 ...	-264.79
Check	08/14/2024	5593		Stock Yards Ban...		Sewage 410 ...	-255.54
Check	09/12/2024	5608		Stock Yards Ban...	X	Sewage 410 ...	0.00
Check	09/12/2024	5609		Stock Yards Ban...		Sewage 410 ...	-255.54
Check	10/08/2024	5628		Stock Yards Ban...		Sewage 410 ...	-283.30
Check	11/11/2024	5647		Stock Yards Ban...		Sewage 410 ...	-289.77
Check	12/16/2024	5670		Stock Yards Ban...		Sewage 410 ...	-292.55
Check	01/17/2025	5697		Stock Yards Ban...		Sewage 410 ...	-283.30
Check	02/11/2025	5714		Stock Yards Ban...		Sewage 410 ...	-347.04
Check	03/17/2025	5733		Stock Yards Ban...		Sewage 410 ...	-264.79
Check	04/10/2025	5749		Stock Yards Ban...		Sewage 410 ...	-289.77
Check	05/14/2025	5770		Stock Yards Ban...		Sewage 410 ...	-262.29
Check	06/16/2025	5785		Stock Yards Ban...		Sewage 410 ...	-285.30
Check	07/11/2025	5804		Stock Yards Ban...		Sewage 410 ...	-264.79
Check	08/07/2025	5822		Stock Yards Ban...	X	Sewage 410 ...	0.00
Check	08/07/2025	5823		Stock Yards Ban...		Sewage 410 ...	-274.04
Check	09/20/2025	5843		Stock Yards Ban...		Sewage 410 ...	-255.54
Check	10/13/2025	5858		Stock Yards Ban...		Sewage 410 ...	-264.79
Check	11/10/2025	5881		Stock Yards Ban...		Sewage 410 ...	-289.77
Check	12/11/2025	5905		Stock Yards Ban...		Sewage 410 ...	-276.82

Total Bluegrass Water UOC, Inc.

-6,625.50

TOTAL

-6,625.50

$$\text{Current } \frac{\text{Sewage}}{4625.50} \div \frac{\text{Water}}{1395.56} = 4.75$$

$$\text{Proposed } 9567.22 \div 1395.56 = 6.86$$

$$\text{Proposed } 9567.22 \div \frac{\text{Sewage } 2022 + 2023}{2103.59} = 4.54$$

$$\text{Proposed Increase } 2941.72$$

$$\text{Sewage B. 11 } 9567.22$$

$$\text{for next 2 years}$$

10:04 AM

12/25/25

Accrual Basis

Wiglesworth Farms LLC
Register QuickReport
 January 2024 through December 2025

Type	Date	Num	Memo	Account	Clr	Split	Amount
Kentucky American Water							
Check	01/04/2024	5441		Stock Yards Ban...		water 410 Tri...	-66.97
Check	02/06/2024	5461		Stock Yards Ban...		water 410 Tri...	-71.47
Check	03/04/2024	5483		Stock Yards Ban...		water 410 Tri...	-76.10
Check	04/03/2024	5500		Stock Yards Ban...		water 410 Tri...	-119.96
Check	05/01/2024	5523		Stock Yards Ban...		water 410 Tri...	-108.14
Check	05/30/2024	5543		Stock Yards Ban...		water 410 Tri...	-101.63
Check	07/02/2024	5565		Stock Yards Ban...		water 410 Tri...	-95.02
Check	08/07/2024	5587		Stock Yards Ban...		water 410 Tri...	-75.88
Check	10/08/2024	5627		Stock Yards Ban...		water 410 Tri...	-89.31
Check	10/29/2024	5640		Stock Yards Ban...		water 410 Tri...	-78.76
Check	11/28/2024	5658		Stock Yards Ban...		water 410 Tri...	-96.79
Check	01/05/2025	5678		Stock Yards Ban...		water 410 Tri...	-94.70
Check	03/17/2025			Stock Yards Ban...		water 410 Tri...	-207.20
Check	04/07/2025			Stock Yards Ban...		water 410 Tri...	-87.37
Check	05/08/2025			Stock Yards Ban...		water 410 Tri...	-87.42
Check	06/06/2025			Stock Yards Ban...		water 410 Tri...	-98.99
Check	07/07/2025			Stock Yards Ban...		water 410 Tri...	-87.45
Check	08/01/2025	5818		Stock Yards Ban...	X	water 410 Tri...	0.00
Check	08/08/2025			Stock Yards Ban...		water 410 Tri...	-93.22
Check	09/08/2025			Stock Yards Ban...		water 410 Tri...	-81.72
Check	10/10/2025			Stock Yards Ban...		water 410 Tri...	-87.48
Check	11/10/2025			Stock Yards Ban...		water 410 Tri...	-87.48
Check	12/10/2025			Stock Yards Ban...		water 410 Tri...	-110.53
Total Kentucky American Water							-2,103.59
TOTAL							-2,103.59

9:58 AM

12/25/25

Accrual Basis

Wiglesworth Farms LLC
Register QuickReport
 January 2022 through December 2023

Type	Date	Num	Memo	Account	Clr	Split	Amount
Bluegrass Water UOC, Inc.							
Check	01/22/2022	4926		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	02/17/2022	4953		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	03/11/2022	4973		Stock Yards Ban...		Sewage 410 ...	-49.34
Check	04/15/2022	5005		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	05/09/2022	5025		Stock Yards Ban...		Sewage 410 ...	-49.34
Check	06/11/2022	5053		Stock Yards Ban...		Sewage 410 ...	-70.49
Check	07/18/2022	5079		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	08/15/2022	5097		Stock Yards Ban...		Sewage 410 ...	-63.44
Check	09/15/2022	5124		Stock Yards Ban...		Sewage 410 ...	-42.22
Check	10/13/2022	5147		Stock Yards Ban...		Sewage 410 ...	-77.54
Check	11/14/2022	5172		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	12/12/2022	5186		Stock Yards Ban...		Sewage 410 ...	-133.92
Check	01/14/2023	5208		Stock Yards Ban...		Sewage 410 ...	-49.34
Check	02/13/2023	5226		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	03/14/2023	5251		Stock Yards Ban...		Sewage 410 ...	-98.69
Check	04/11/2023	5278		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	05/10/2023	5306		Stock Yards Ban...		Sewage 410 ...	-126.87
Check	06/13/2023	5325		Stock Yards Ban...		Sewage 410 ...	-49.34
Check	07/17/2023	5344		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	08/14/2023	5355		Stock Yards Ban...		Sewage 410 ...	-49.34
Check	09/13/2023	5369		Stock Yards Ban...		Sewage 410 ...	-35.25
Check	10/12/2023	5394		Stock Yards Ban...		Sewage 410 ...	-42.29
Check	11/14/2023	5411		Stock Yards Ban...		Sewage 410 ...	-77.54
Check	12/12/2023	5431		Stock Yards Ban...		Sewage 410 ...	-42.29
Total Bluegrass Water UOC, Inc.							-1,395.56
TOTAL							-1,395.56

12/11/2025

Dear Customer:

We are writing to update you on the wastewater services that serve your community.

Since purchasing the wastewater system that serves you, Bluegrass Water Utility Operating Company, LLC (Bluegrass Water) has invested nearly \$18.6 million in Kentucky communities to ensure that you, your families and your neighbors have access to clean, safe and reliable wastewater resources. The infrastructure upgrades to the wastewater system serving you may include installation of remote monitoring equipment to assure facilities are closely tracked and working properly at all times; sewer plant improvements to ensure proper treatment including flow equalization, replacement of blowers, pipes, and diffusers in aeration tankage, and many more necessary repairs. As a result of these efforts and additional improvements planned, Bluegrass Water expects to submit a request on December 11, 2025 to the Kentucky Public Service Commission (PSC) for a general adjustment of rates charged for service in order to increase annual wastewater operating revenues by \$2,669,423.86.

Please take notice of the following information about the proposed rate adjustment that is presented below:

The rates contained in this notice are the rates proposed by Bluegrass Water, but the PSC, the state agency that regulates all utility services in Kentucky, may order rates to be charged that differ from the proposed rates found in this notice. The Company has proposed raising residential rates from the present rate of \$77.77 to the proposed rate of \$114.00, which represents an increase of \$36.23 or 46.6% and also represents the effect upon the average bill for residential customers. The Company has also proposed raising the non-residential minimum charge from \$197.43 to \$285.00 which represents an increase of \$87.57 or 44.4%. The non-residential usage charge has been proposed to increase from \$11.67 per 1,000 gallons to \$55.86 per 1,000 gallons representing an increase of \$44.19 or 378.7%. The date the proposed rates are expected to be filed with the PSC is 12/11/2025; the proposed effective date of the rates is for service rendered on and after 1/31/2026. For the non-residential Delaplain customers, the average customer usage is 86,879 gallons and the effect the proposed rate will have on the average bill for each customer is an increase of \$3,926.86 or 324.2%.

You may examine Bluegrass Water's application at the offices of Dinsmore & Shohl LLP, 101 South Fifth St., Suite 2500, Louisville, KY 40202. If you would like to make prior arrangements to view the application at Dinsmore & Shohl LLP, please contact (866) 752-8982 or support@bluegrasswateruoc.com. Bluegrass Water's application may also be examined at the PSC's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., or through the commission's Web site at <http://psc.ky.gov>. Comments regarding the application may be submitted to the PSC through its Web site or by mail to:

Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602.

You may submit a timely written request for intervention to the PSC, establishing the grounds for the request including your status and interest in the proceeding, by mail to:

Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602.

If the PSC does not receive a written request for intervention within thirty (30) days of the mailing of this notice, the PSC may take final action on the application.

Josiah Cox
President
Bluegrass Water Utility Operating Company, LLC

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: 2025-00354 FW: PHIL Hazle
Date: Monday, December 29, 2025 8:55:00 AM

Case No. 2025-00354

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, 2025-00354 in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00354 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Phil Hazle [REDACTED]
Sent: Sunday, December 28, 2025 5:37 PM
To: PSC Consumer Inquiry [REDACTED]
Subject: PHIL Hazle



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Decemer 29, 2025

To: Public Service Commission
P. O. Box 615
Frankfort, KY 40602

From: Phil Hazle
[REDACTED]
New Concord, KY 40276
Email: [REDACTED]
Phone: [REDACTED]

Re: Intervention Request
Case 2025-00354

I have lived at my current address (Calloway County) over 40 years in the Center Ridge Water District.

In May 2020 Bluegrass Water bought the water system from Center Ridge Water District for \$120,000.00

Our flat rate for water was \$22.79 on that date. This rate does not include sewer. Approximately four months later Bluegrass requested a rate increase to \$105.84 as I remember. The PSC approved a rate increase to \$77.63 under Case #2020-00290, over tripling our rates. A review of 2020 case will reveal the vote was 2 to 1 with Chairman Kent Chandler writing a strong dissent. I encourage the Commission to review Commissioner Chandler's dissent in Case #2020-00290.

We were treated unfairly in 2020.

On December 11, 2025, Bluegrass has again asked for another unfair, unjust and unreasonable rate increase.

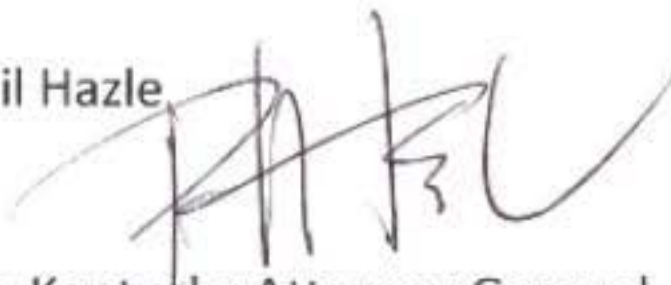
This out of state company bought about 15 systems in Kentucky. I believe our system is the only "water only" purchase. I found expenses they claimed in 2020 that appeared to be inflated and questionable.

I am again asking the Public Service Commission to protect the citizens of Calloway County from this greedy utility company. Furthermore, I ask the Commission to lower the existing inflated rate of \$77.63 at its discretion.

All we are asking is to be treated fairly. Please reserve our right of intervention or objection to oppose this unfair rate increase.

Thank you for your consideration.

Phil Hazle

A handwritten signature in black ink, appearing to be 'PHIL HAZLE', written over a horizontal line.

cc: Kentucky Attorney General
Rate Intervention Section
1024 Capital Center Drive
Frankfort, KY 40601

Honorable Kenneth C. Imes
Calloway County Judge/Executive

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
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Frankfort, KY 40601-8204

*Bluegrass Water Utility Operating Company, LLC
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St. Louis, MO 63131

*Aaron Silas
Central States Water Resources
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