

Public Comments Received for Case Number: 2025-00354
Response Monday, February 2, 2026

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, January 30, 2026

From: Matthew Renfrow
City: Shepherdsville
State: KY
Zip: 40165

Comments:

Dear Commissioners of the Kentucky Public Service Commission,
I am writing to formally protest the proposed rate increase requested by Bluegrass Water Utility Operating Company under Case No. 2025-00354. I am a concerned ratepayer and resident of Shepherdsville, Kentucky and I believe the proposed increase is excessive and would cause significant financial hardship.

The current utility costs are already difficult to manage within my budget. A further increase of 46.6% would mean trying to afford all other utilities and taking care of our newborn extremely difficult!

I urge the Commission to carefully scrutinize the utility companys justification for this increase, especially given concerns that rates have already been increased in a short amount of time since the company has purchased our sewer system.

I respectfully request that the KPSC deny or substantially reduce the requested rate increase to protect the average consumer. Your decision directly impacts the financial well-being of Kentuckians.

Thank you for your time and for considering my comments as part of the official case record.

Sincerely,

Matthew Renfrow

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: 2025-00354 FW: KY PSC Utility Inquiry
Date: Monday, February 2, 2026 9:39:00 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: KY Public Service Commission <pscfilings@ky.gov>
Sent: Thursday, January 29, 2026 4:30 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 [REDACTED] on Thursday, January 29, 2026 at 4:30 PM

Name: Kimberly Jenkins

Address: [REDACTED]

City: Prospect

State: KY

Zip Code: 40059

Phone number where you can be reached: [REDACTED]

Home phone:

Utility Name: Bluegrass Water Utlitiy Operating Comapny

State the nature of your concern: How can Bluegrass Water Utility Operating Company increase our rate 46.6% in one fell swoop? That is an incredibly high increase and we would like to know why they would be allowed to do that when we have no other options for sewer service in our area. (River Bluff Farms Oldham County) It feels like we should be given options, instead of an almost 50% increase with no other services to choose from. What is the PSC doing to regulate the increase and what can we do to intervene.

Have you contacted the utility about the problem: Yes

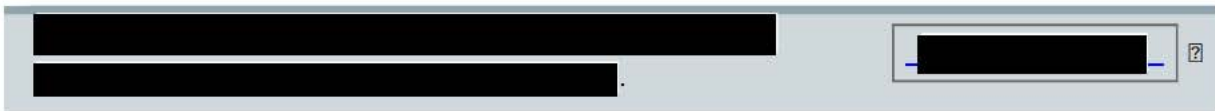
From: [PSC Public Comment](#)
To: [Kaitlyn Edlund](#)
Subject: RE: Opposition to Bluegrass Water Rate Increase — Case No. 2025-00354
Date: Monday, February 2, 2026 9:40:00 AM

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: Kaitlyn Edlund [REDACTED]
Sent: Saturday, January 31, 2026 2:51 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Opposition to Bluegrass Water Rate Increase — 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.

I have lived at [REDACTED], Prospect, KY 40059 since 2021. Directly behind my home is a sewer clean-out that produces a constant, loud “humming” noise and a strong, foul sewer odor that lasts several days each month. These conditions have significantly impacted our quality of life.

Because of the noise and smell, we rarely invite guests over anymore, as our backyard is not enjoyable to spend time in. Visitors who have come to our home have noticed and commented on both the odor and the noise. My daughter does not enjoy playing in the backyard due to these ongoing issues, which has taken away from her ability to safely and comfortably use our own property.

I have filed one to two complaints in the past with Bluegrass Water regarding both the excessive noise and the poor smell, yet these problems persist with no meaningful resolution.

Just in the last several years, my sewer rates have risen dramatically — from roughly \$35 to the currently proposed \$114 per month. This increase is excessive and does not reflect the level of service provided, the conditions residents are living with, 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. The ongoing noise and odor from the clean-out behind my home demonstrate that significant issues remain unresolved.
- **Quality of Life Impact:** The constant humming noise and recurring sewer odor directly diminish our ability to use and enjoy our property, entertain guests, and allow our child to play in our backyard.
- **Financial Burden:** The proposed \$114 monthly bill is unaffordable for many households, especially seniors and families on fixed incomes, while 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 the Commission deny the proposed increase and require a full, independent audit — as well as a review of the specific infrastructure issues affecting neighborhoods like mine — before considering any further rate adjustments.

Thank you for your time and consideration.

Sincerely,

Kaitlyn Edlund

[REDACTED]

Prospect, KY 40059

[REDACTED]

[REDACTED]

From: [PSC Public Comment](#)
To: ["Patrice Jimenez"](#)
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC Proposed Wastewater Rate Adjustment (Filed December 11, 2025)
Date: Monday, February 2, 2026 9:41:00 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: Patrice Jimenez [REDACTED]
Sent: Sunday, February 1, 2026 7:19 PM
To: PSC Public Comment [REDACTED] Nunn, Matt (State Sen.) (LRC)
[REDACTED]; Hampton, Tony (State Rep.) (LRC)
[REDACTED]
Subject: Re: 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: 02/01/2026

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

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:

Grant this request for intervention pursuant to KRS 278.260;

Require Bluegrass Water to submit detailed cost-of-service and rate-design justification;

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

On Sat, Dec 27, 2025, 10:42 AM Patrice Jimenez [REDACTED] wrote:

Patrice Jimenez


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

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:

Grant this request for intervention pursuant to KRS 278.260;

Require Bluegrass Water to submit detailed cost-of-service and rate-design justification;

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

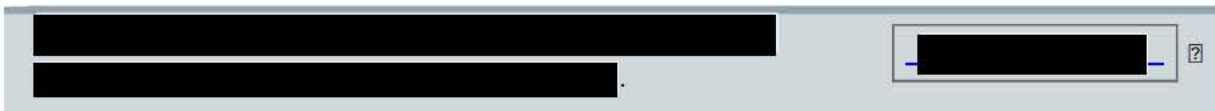
From: [PSC Public Comment](#)
To: [manuel jimenez](#)
Subject: RE: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC
Date: Monday, February 2, 2026 9:41:00 AM

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: manuel jimenez [REDACTED]
Sent: Sunday, February 1, 2026 7:23 PM
To: PSC Public Comment [REDACTED]; Hampton, Tony (State Rep.) (LRC)
[REDACTED] Nunn, Matt (State Sen.) (LRC) [REDACTED]
Subject: Formal Request for Intervention – Bluegrass Water Utility Operating Company, LLC



Manuel Eduardo 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:

Grant this request for intervention pursuant to KRS 278.260;

Require Bluegrass Water to submit detailed cost-of-service and rate-design justification;

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,

Manuel Edwadro Jimenez

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Sreenu Dandamudi
Central States Water Resources
1650 Des Peres Road
Suite 303
St. Louis, MO 63131

*Aaron Silas
Central States Water Resources
1650 Des Peres Road
Suite 303
St. Louis, MO 63131

*Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601

*R. Brooks Herrick
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KY 40202

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Edward T Depp
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KY 40202

*Cameron R Culbertson
Scott County Attorney
198 E. Washington St.
Georgetown, KY 40324

*Bluegrass Water Utility Operating Company, LLC
1630 Des Peres Road, Suite 140
St. Louis, MO 63131

*Timothy Mayer
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KY 40202

*Honorable David Edward Spenard
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KY 40202

*Bluegrass Water Utility Operating Company, LLC
1630 Des Peres Road, Suite 140
St. Louis, MO 63131

*Hannah Thompson
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KY 40202

*Russ Mitten
Bluegrass Water Utility Operating Company, LLC
1630 Des Peres Road, Suite 140
St. Louis, MO 63131

*Joe Pat Covington
Judge/Executive
101 East Main Street
Suite 210
Georgetown, KY 40324

*Randal A. Strobo
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KY 40202