

Public Comments Received for Case Number: 2025-00354
Response Wednesday, February 11, 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

Tuesday, February 10, 2026

From: LeAnna Rawson
City: Georgetown
State: KY
Zip: 50325

Comments:

My bill was always pretty consistent. Then in about the past 6 months or so it has been increasing. But the last 2 months have been outrageous increases.

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Tuesday, February 10, 2026

From: Nicole Russell
City: Elizabethtown
State: Kentucky
Zip: 42701

Comments:

This company has had several complaints all over several states. They have been playing the same dog and pony show about rates and tariffs that give them the excuse to raise peoples rates by astronomical amounts. We the people will not be taking it anymore. This corrupt greed needs to come to an end. Several ppl are here to denounce this companies lies and deception along with their lawyers. Shame on them for helping these crooks rob us blind. We are asking you to investigate this company to the fullest extent of the law. They have several companies with different names all over the US doing the same exact thing. Somebody needs to step in somewhere and put an end to this. Please listen to us

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Tuesday, February 10, 2026

From: Jessica Young
City: Prospect
State: KY
Zip: 40059

Comments:
Phil and Jessica Young
3700 Locust Circle E
Prospect KY 40059-8025

February 9, 2026

Kentucky Public Service Commission
PO Box 615
Frankfort, KY 40602

RE: Strong Opposition to Proposed Bluegrass Water Rate Increase (Case No. 2025-00354)

Dear PSC:

On January 29, 2026, we received a letter from Bluegrass Water Utility Operating Company regarding an update to their December 11, 2025 filing with the Kentucky Public Service Commission (Case No. 2025-00354). This filing proposes a substantial and highly objectionable general rate increase for residential sewer customers (among other rate increases that do not apply to us but which are equally heinous) to \$114.00 per month (up from the current \$77.77 charge). This rate hike represents an absurd increase of 46.6% – i.e., the equivalent of an additional \$36.23 on every bill.

This is not the first time Bluegrass Water has requested approval for a significant rate increase, but we are fairly certain this is the most egregious to date. Customers' incomes do not increase proportionally with such an extreme rate hike. It would create an unnecessary hardship for customers to have to pay an additional \$434.76 per year for a service that isn't optional (and isn't noticeably improving), especially within the context of the current economy, when the cost of literally every product and service continues to rise while wages stay stagnant.

We have read many other customer complaints that have been submitted to the PSC regarding this case, and clearly, a large number of Bluegrass Water customers have the same

concerns that we do over this reprehensible attempt to gouge customers' wallets even more than they already have. We would particularly like to reference and support the complaints from Larry Averitt of Paducah and Arthur Jamarillo of Richmond (received by the PSC at the end of December 2025), who both submitted very thoughtful and comprehensive letters detailing the many reasons this steep rate increase should not be granted.

We would also like to note that the letter from Bluegrass Water stated that "[i]f 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." While the letter was dated January 9, 2026, it was not postmarked until January 27, 2026 – 18 days later. As indicated above, we received the letter two days after that. By creating such a large gap between the writing of Bluegrass Water's letter and its mailing, we believe this to be an intentionally deceptive and/or obstructive practice intended to keep customers from being able to submit complaints in a timely manner.

We would like to request that the PSC deny any and all of Bluegrass Water's rapid rate increases at this time. Thank you for protecting the interests of Kentucky residents and for your efforts to ensure fair utility rates for customers across the state.

Sincerely,
Phil and Jessica Young

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Tuesday, February 10, 2026

From: Melanie Ramage
City: Paducah
State: KY
Zip: 42003

Comments:

In the DIRECT TESTIMONY OF Matt Howard, a Utility and Regulatory Financial Analyst at ScottMadden, Inc., and expert witness on behalf of Bluegrass Water, LLC, he is discussing the requested return on equity (ROE) for CSWR / Bluegrass Water. He states in part:

As established in Bluefield and Hope, the fair rate of return, including the cost of common equity, should provide the utility the opportunity to earn returns comparable to other investments with similar risks, at a level sufficient to assure investors that the enterprise will maintain its financial integrity. Because utilities compete for capital with other firms of comparable risk, the return authorized by the regulatory process should provide the utility with the ability to attract capital at a reasonable cost. In addition, the return should enable the utility to fulfill its obligations to the public of providing safe and reliable service at all times.

~ Direct Testimony of Matthew Howard Case No. 2025-00354 Exhibit 17 pp. 8,9

SoCSWR / Bluegrass Water WANTS TO TALK ABOUT COMPARABILITY when it benefits them! In just this short paragraph of three sentences, Mr. Howard uses the term comparable twice.

However, the usual and customary application of that same basic concept of COMPARABILITY was NEVER MENTIONED with regard to the calculation of fair, just, and reasonable monthly service rates, pursuant to KRS 278.030 and KRS 278.270.

This clearly demonstrates the intentionally biased, unjust, and corrupt nature of CSWRs self-serving arguments in favor of their unwarranted rate increase requests.

Furthermore, Mr. Howard states in Exhibit 17 pp. 53-55, that CSWR / Bluegrass Water incurs extraordinary business risk due to its acquisition of troubled water and wastewater systems. And according to CSWR / BW, every system they purchase is troubled or distressed, and in need of costly repairs, which we know is BLATANTLY FALSE.

Just one documented example of that fact is the unsuccessful acquisition attempt of the Look Up Forest system in South Carolina, which CSWR, LLC / CSWR-SC described as a troubled wastewater system. However, SCPSC official documentation states:

In response to ORS Discovery Request No. 1-39, CSWR-SC specified Look Up Forest HOA was a troubled wastewater system. The Company indicated it based its position on a list of a multiple wastewater system assets that the Company felt based upon a visual inspection either needed rehabilitated or replaced. The Company also stated Look Up Forest HOA was a troubled system due to what it deemed was a consistent failure to comply with permit requirements and environmental regulations.

ORS disagrees with the Companys position that Look Up Forest HOA is a troubled system. As discussed in the Direct testimony of ORS Witness Mehzard, the Look Up Forest HOA has made substantial capital investments in the wastewater system during the past few years in order to bring the system into compliance. The Look Up Forest HOA has also worked closely with Renewable Water Resources (ReWa) to establish an action plan to address its environmental challenges. The actions of Look Up Forest HOA to invest capital and comply with the environmental regulations indicate the Look Up Forest HOA is a viable wastewater system.

~Direct Testimony of Daniel P. Hnnnell II September 30, 2024 Docket No. 2024-28-S Look Up Forest Homes Association, Inc. p.19

Additionally, facts like these cast extreme doubt on CSWR, LLC / Bluegrass Waters use of the terms troubled or distressed with regard to ALL of their system acquisitions!

But perhaps that extraordinary business risk stems from the cost to SCWR, LLC / Bluegrass Water for acquiring new systems? However that is obviously not the case, based on the following quote from CSWR, LLC President, Josiah Cox.

Our first offer for these distressed systems is one dollar (\$1.00) . . .right . . .is where we begin the negotiations with these owners, and then we work our way towards the lowest price we can purchase the system for.

And in fact, MANY of the systems acquired by CSWR, LLC were purchased for the sum total of \$1.00.

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From: Michael
City: Elizabethtown
State: KY
Zip: 42701

Comments:

Prices are already way to high if price goes up more will be putting in a septic tank. Will be cheaper in the long run!! Stopthis price gouging company now!

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From: LARRY AVERITT
City: Paducah
State: KY
Zip: 42003

Comments:

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Extraordinary risk, indeed!!!

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From: In the DIRECT TESTIMONY OF Matt Howard, a Utility
City: Paducah
State: KY
Zip: 42003

Comments:

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