

March 9, 2026

Linda Bridwell, P.E.
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RE: *Northern Kentucky Water District – Case No. 2025-00239*

Dear Ms. Bridwell:

Please find the enclosed Response to Commission Staff's First Request for Information in Case No. 2025-00239.

If you have any questions about this filing, please feel free to contact me.

Respectfully Submitted,



Tom Edge, Esq. (KBA #95534)
General Counsel
Director of Compliance, Communications, and Regulatory Affairs
Phone - 859-578-5457
Email : tedge@nkywater.org

enclosure

cc : Mr. Charles Downton, 7434 Tollgate Road, Alexandria, Kentucky 41001

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

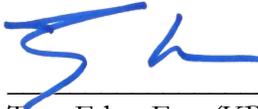
In the Matter of:

CHARLES E. DOWNTON)	
)	CASE NO. 2025-00239
COMPLAINANT)	
)	
V.)	
)	
NORTHERN KENTUCKY WATER DISTRICT)	
)	
DEFENDANT)	

RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Comes now the Northern Kentucky Water District ("NKWD") and submits its responses to the Commission Staff's Request for Information dated February 19, 2026.

RESPECTFULLY SUBMITTED:



Tom Edge, Esq. (KBA #95534)
Cassandra Zoda, Esq. (KBA #96871)
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Counsel for Northern Kentucky Water District

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on March 9, 2026 with a copy mailed to Mr. Charles Downton, 7434 Tollgate Road, Alexandria, Kentucky 41001 and that there are currently no other parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



Tom Edge, Esq. (KBA #95534)

NORTHERN KENTUCKY WATER DISTRICT

Response to Commission Staff's First Request for Information

CASE NO. 2025-00239

WITNESS – Barry Miller, Customer Service Manager

Q.1. Refer to Northern Kentucky District's Answer and Motion to Dismiss, filed September 25, 2025, paragraph 6 and Exhibit A, pdf at 12.

a. Reconcile the late penalty differences.

b. Explain how Northern Kentucky District calculated \$50.29 that appears as the Penalties Adjustment line item.

A.1. NKWD states that paragraph 6 relates to the water service charges only and applicable late fee (without consideration of taxes included). This amount was provided in that method to provide context and understanding for where Mr. Downton's number originated. The bill in Exhibit A, pdf at 12, shows it as billed which included taxes and penalty therefrom. That penalty was adjusted out until such time as this matter is resolved and new due date for the disputed balance set.

NORTHERN KENTUCKY WATER DISTRICT

Response to Commission Staff's First Request for Information

CASE NO. 2025-00239

WITNESS – Barry Miller, Customer Service Manager

Q.2. Explain how Northern Kentucky District will calculate the Complainant's late penalty if the \$504.55 unpaid bill receives the \$123.02 adjustment proposed in Exhibit C and identify any tariff provisions relevant to the calculation.

A.2. NKWD states the NKWD Tariff Section VIII – Payment of Bills states that bills shall become delinquent thirty (30) days after the billing date and once considered delinquent, a ten percent late penalty charge will be included.

As the billing is disputed and pending before the Commission, NKWD has placed a hold on the bill in dispute. Upon closure of this matter, NKWD as it has in past practice, will comply with the Commission's order if such requires any adjustment and from there reissue the bill to the customer with a new allotted thirty (30) days to make payment. If the bill remains unpaid after the thirty days, it is consider delinquent and the ten percent late penalty will be added to the bill.

NORTHERN KENTUCKY WATER DISTRICT

Response to Commission Staff's First Request for Information

CASE NO. 2025-00239

WITNESS – Barry Miller, Customer Service Manager

Q.3. Refer to Northern Kentucky District's Tariff Original Sheet No. 14.

- a. State how Northern Kentucky District defines “multi-family buildings.”**
- b. Explain the process Northern Kentucky District uses when establishing service for a new multi-family building customer.**

A.3. NKWD states that “multi-family buildings” is not specifically defined in NKWD’s Tariff. For classification and billing purposes, multi-family buildings fall within the Tariff’s definition of “Commercial,” which includes “sales to multiple premises residences served through a single meter or battery of meters,” including “two (or more) family houses and apartment houses.” See NKWD Tariff, Section I-A, Definition 9, Original Sheet No. 7.

Generally, NKWD’s practice has been to treat residential premises that contain more than one dwelling unit as multi-family buildings. This approach is supported by NARUC Uniform System of Accounts which defines “multiple family dwelling” to mean “a residential structure or group of structures which is capable of separately housing more than one family unit.” See *Public Service Commission Administrative Case No. 314, Adoption of a New Uniform System of Accounts for Kentucky Water Utilities* (Ky. PSC 2002) (NARUC Usa for Class A/B Water Districts and Associations, Definition No. 17.).

When establishing service for a new multi-family building customer, NKWD follows the general process set forth in the Tariff, with the metering configuration desired determining the application type and customer classification. Where a multi-family building is to be served by a master meter (a single meter serving the entire building), the property owner or authorized representative submits an Application for Water Service (Commercial). The account is classified as Commercial, and the property owner is the customer of record responsible for all charges. Where a multi-family building is to have individually metered units, each unit requires its own service connection and meter, and each unit's occupant or owner submits an Application for Water Service (Residential). Each individually metered unit is classified as Residential.

