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**PUBLIC SERVICE
COMMISSION**

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November 13, 2025

Ms. Linda C. Bridwell
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602-0615

Re: Case No. 2025-00284
MARJORIE PATRICIA ENGLISH V. GRAYSON COUNTY WATER DISTRICT

Dear Ms. Bridwell:

Please find enclosed for filing on behalf of Grayson County Water District an Answer to the Complaint in the above styled case.

This is to certify that the Answer has been submitted to the Commission via email to PSCED@ky.gov and mailed via first-class mail with the U.S. Mail to the Complainant at the address listed on the complaint on this the 13th day November, 2025. No paper copies of this filing will be made with the Commission.

Should you have any questions, please contact me at your convenience.

Sincerely,



Lindsay Durbin

Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MARJORIE PATRICIA ENGLISH)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2025-00284
GRAYSON COUNTY WATER DISTRICT)	
)	
DEFENDANT)	

ANSWER

Defendant Grayson County Water District (“Grayson District” or “Defendant”) for its Answer to the Complaint of Marjorie Patricia English (“Complainant”) respectfully states:

1. Grayson District admits that Complainant requested an inspection on or about June 13, 2025 at the property located at 118 Wilson Lane due to suspected water leak.
2. Grayson District admits that water service was discontinued on June 20, 2025 by a Grayson County Water District technician.

3. Grayson District admits that the bill for water usage issued on July 17, 2025 was \$6,455.39, representing approximately 853,820 gallons. However, after discussion with the Complainant, Grayson District offered to give the Complainant credit for the 1,500 gallons paid each month for 23 months based on the minimum billing (34,500 gallons) for which they were charged and agreed to credit the Complainant for the water lost between their initial inspection on June 13, 2025 and the water disconnection on June 20, 2025 (48,830 gallons). That brought the total billable gallons down to 770,490 gallons for a total bill of \$5,845.92. Complainant was then offered the benefit of a payment plan to assist with payment.
4. Grayson District admits that the water meter at the subject property is over fifteen years old; however, when the meter was removed and replaced the meter was tested and there were no issues found with the meter.
5. Grayson District admits that reported billings volumes at 118 Wilson Lane may have been affected by equipment issues since September 2023; however, Grayson District emphasizes that customers are in the best and most reasonable position to monitor their own water consumption patterns. Unlike Grayson District, which serves thousands of customers across a wide geographic area, customers have daily access to their property and immediate knowledge of their water usage activities. Properties legitimately experience

periods of zero consumption due to vacancy, travel, or seasonal use, making it impossible for Grayson District to distinguish between legitimate non-use and potential meter malfunctions without customer input. Customers receive monthly bills showing their consumption and are therefore uniquely positioned to identify and promptly report irregularities in their usage patterns. Grayson District reasonably relies on customers to fulfill this basic monitoring responsibility, as customers alone possess the knowledge of whether water should or should not be consumed at their specific property during any given billing period.

6. Grayson District denies that it failed to properly maintain its equipment or that such alleged failure prevented timely leak detection.
7. Grayson District denies that it is obligated under its existing tariff to base billing on historical usage rather than actual usage as recorded by its equipment.
8. Any allegations not specifically admitted herein are denied.

DEFENSES

9. The Complaint fails to set forth any claim upon which relief can be granted by this Commission and, therefore, should be dismissed.

10. The Complaint fails to set forth a prima facie case that Grayson District has violated its tariff or any statute or Commission regulation, and the Complaint should be dismissed for that reason.
11. Grayson District has acted fully consistent with its tariffs and the Filed Rate Doctrine set forth in KRS 278.160 therefore bars Complainant claims.
12. Original Sheet No. 38 of Grayson District's tariff on file with the Commission provides that "W. Leak Adjustments. The District does not make any adjustments for leaks." The Complaint's requested relief is contrary to the expressed terms and conditions to which Complainant agreed to receive service.
13. Complainant had the obligation to monitor water usage and promptly report suspected leaks to minimize damage and excessive usage.
14. Complainant received monthly bills consistently showing zero water usage from September 2023 through June 2025—a period of nearly two years—despite her actual, continuous occupancy and regular water consumption at the property. Complainant had both actual knowledge of her water consumption and constructive notice through monthly billing statements showing no usage. Despite this clear and ongoing notice, Complainant failed to alert Grayson District to the discrepancy for nearly two years. Had

Complainant exercised reasonable diligence and promptly notified Grayson District when she first received bills showing zero usage while actively consuming water, Grayson District could have corrected the Endpoint issue. Complainant's failure to act on obvious and continuous notice directly caused the damages she now seeks to avoid, making her own negligence the proximate cause of her claimed harm.

15. Complainant has generally failed to sustain her burden of proof under the applicable statutes, including but not limited to, KRS 278.260, KRS 278.270, and KRS 278.280.

16. Any damages claimed by Complainant were caused by Complainant's own negligence or failure to properly maintain the plumbing system on the property.

17. Grayson District respectfully reserves the right to plead any and all additional defenses that discovery may reveal.

WHEREFORE, based on the foregoing, Grayson District respectfully requests the Public Service Commission dismiss the Complaint with prejudice as Grayson District has complied with its Tariff and the relevant statutory and regulatory requirements. Furthermore, it has offered Complainant all available assistance available to her as authorized by Grayson District's tariff and as highlighted herein.

While Grayson District regrets that this unfortunate circumstance has happened upon Complainant, Grayson District is limited only to the remedies called for in its Tariff as approved by the Public Service Commission as outlined herein.

Dated: November 13, 2025

Respectfully submitted,

/s/ Lindsay Durbin

Lindsay Durbin

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Counsel for Grayson County Water District

COMMONWEALTH OF KENTUCKY)
) **SS**
COUNTY OF GRAYSON)

IN TESTIMONY WHEREOF, witness the signature of the undersigned on this 13 day of November, 2025.

Subscribed and sworn to before me, a Notary Public in and for said County and State,
by Jeremy Woosley, in his capacity as District Manager of Grayson County Water
District, on this 13 day of November 2025.

My Commission expires: 2/10/26

CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on November 13, 2025; A copy of this response has this day been mailed via First-Class Mail to: Marjorie Patricia English at 118 Wilson Lane Leitchfield, KY 42754.

/s/ Lindsay Durbin

Lindsay Durbin

Counsel for Grayson County Water District