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August 19, 2026

Mr. Justin M. McNeil
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

AUG 19 2026

**PUBLIC SERVICE
COMMISSION**

Re: Case No. 2026-00111
Brittany Kincaid v. Farmdale Water District

Dear Mr. McNeil:

Please find enclosed Farmdale Water District's Motion to Dismiss and the Usage Reports from Ms. Kincaid's water meter for the weeks of August 11, 2026 and August 18, 2026.

Respectfully,

/s/ Tina C. Frederick
Tina Frederick
Counsel for Farmdale District

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BRITTANY KINCAID	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2026-00111
	)	
FARMDALE WATER DISTRICT	)	
	)	
DEFENDANT	)	

**MOTION TO DISMISS,
USAGE REPORT FOR AUGUST 3, 2026 – AUGUST 11, 2026, 5:00 A.M.,
AND USAGE REPORT FOR AUGUST 11, 2026 – AUGUST 18, 2026, 9:A.M.**

By and through the undersigned counsel, Farmdale Water District (“Farmdale” or “the District”) moves the Commission for an Order finding this Complaint has been satisfied. The District also provides notice of its filing of the Usage Reports for August 3, 2026, 12:00 a.m. through August 11, 2026, 5:00 a.m., and for August 11, 2026, 6:00 a.m. through August 18, 2026, 9:00 a.m. for the water meter serving Complainant’s residence. In support of its Motion, Farmdale states the following:

1. Ms. Kincaid filed her Complaint on April 28, 2026 seeking: (1) verification of a zero balance in the form of a written receipt or billing statement

showing the March 2026 balance was adjusted to zero; (2) a full account audit to ensure the “16-day overlap and double billing” that she alleged were corrected; and (3) that Farmdale District be required to list the full five-digit readings and the “100X multiplier” on all future statements to facilitate billing transparency.¹ In her Complaint, Ms. Kincaid acknowledged that the partial payment of \$78.56, which she tendered to Farmdale District on April 8, 2026, for her water bill dated March 25, 2026, was accepted as payment in full for her \$172.01 bill.

2. On June 16, 2026, the Commission ordered Farmdale to Answer or satisfy Ms. Kincaid’s Complaint within 10 days of its Order.

3. On June 18, 2026, Farmdale filed its Answer and Satisfaction, which included: (1) a report from Farmdale’s billing system showing no balance on Ms. Kincaid’s account; (2) a full accounting of Ms. Kincaid’s meter readings and an explanation for how her bills were generated and calculated from January 2026 through March 2026 to provide assurance that no double billing or billing period overlapping occurred, (3) an in-depth explanation of how Farmdale’s billing system operates; and (4) usage reports from Ms. Kincaid’s water meter.

¹ Complaint at PDF 5 of 15.

4. On June 29, 2026, Ms. Kincaid filed a statement into this proceeding in which she again alleged billing irregularities and requested that the Commission order Farmdale to display “explicit 5-digit accuracy data” on its bills.²

5. In its Answer and Satisfaction and in a subsequent filing it made on June 30, 2026, Farmdale explained that the new meters in its system (such as Ms. Kincaid’s meter) are programed to read to the gallon and the older meters in its system are read to the 100s of gallons, it must reprogram all of its older meters or replace them with new meters before reprogramming its billing system to bill to the gallon, rather than to the 100s of gallons.

6. Reprograming the billing system also involves the loss of historical data that must be preserved prior to reprograming. The way meter readings appear on Ms. Kincaid’s bill is the same way meter readings have appeared on Farmdale’s bills for decades. Reprograming the billing system to accept and to print meter readings of up to seven digits, which it what is necessary to read meters to the gallon and print the full meter reading on the bills,³ is going to cost Farmdale several thousand dollars in programing costs and it can only be done *after* all older meters are either replaced or reprogramed. Therefore, although this is a goal Farmdale has set for itself, this cannot happen imminently.

² Kincaid Supplemental Evidence at PDF 4 of 4, numbered paragraph 3 (filed June 29, 2026).

³ Displaying seven digits is necessary to record readings up to 1,000,000 gallons.

7. On June 30, 2026, Farmdale filed a usage report from Ms. Kincaid's meter for all water passing through the meter from midnight on June 1, 2026 until 5:00 p.m. on June 29, 2026 and a copy of Ms. Kincaid's June 25, 2026 bill.

8. Farmdale has filed weekly usage reports for Ms. Kincaid's meter into the record of this proceeding since July 8, 2026.

9. On July 30, 2026, Farmdale also filed a copy of Ms. Kincaid's July 27, 2026 bill.⁴

10. Ms. Kincaid's July 27, 2026 bill covered the June 1, 2026 through June 30, 2026 billing period. The bill was for 2,200 gallons of usage. The "Present" meter reading as shown on the bill was "277" the "Previous" reading as shown on the bill was "255."

11. The usage report filed by Farmdale on June 30, 2026 shows meter readings from 25569 through 25590 on June 1, 2026.⁵ The usage report filed by Farmdale on July 8, 2026 shows meter readings from 27721 through 27780 on June 30, 2026.⁶

12. The meter readings appearing on Ms. Kincaid's bills are merely **truncated** to the 100s of gallons. They are neither rounded up nor down, nor are

⁴ Farmdale Water District Notice of Filing at PDF 9 of 9 (filed July 30, 2026).

⁵ Farmdale Water District's Response to Complainant's June 28, 2026 Filing at PDF 26 of 26 (filed June 30, 2026).

⁶ Farmdale Water District Notice of Filing at PDF 8 of 9 (filed July 8, 2026).

they multiplied by anything. The readings are truncated expressions of actual meter readings that Farmdale District has demonstrated were made on the day that the bill indicates they were made.

13. Farmdale has provided nearly three-months' worth of weekly usage reports and two customer bills subsequent to Ms. Kincaid's Complaint wherein she sought assurance that the bill credit she received in April 2026 was permanent. The bill credit is permanent. Farmdale District has demonstrated that by filing subsequent bills that do not reference any prior balance.

14. There has **never** been any disputed amount involved in this Complaint. Even Ms. Kincaid acknowledges that Farmdale District does not owe her any amount.

15. Farmdale has filed an Answer to Ms. Kincaid's Complaint as ordered by the Commission and has attempted to satisfy the Complaint every way possible under the circumstances.

16. Farmdale has provided the Commission with substantial evidence to support a finding that there are no irregularities in its billing practices and that Ms. Kincaid's bills have been calculated accurately.

WHEREFORE, for the foregoing reasons, Farmdale District seeks an Order from this Commission finding that this Complaint is dismissed.

Dated: August 19, 2026

Respectfully submitted,

/s/Tina C. Frederick

Tina C. Frederick

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Counsel for Farmdale Water District

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 August 19, 2026; and that a true and accurate copy of this filing has been sent via U.S. Mail to Ms. Brittany Kincaid at the address provided on the Complaint.

/s/Tina C. Frederick
Tina C. Frederick

Usage Report

August 3, 2026 – August 11, 2026

Intervals (EDT)	Consumption (Gal) - Usage	Consumption (Gal) - Reading
8/11/2026 5:00	0	31303
8/11/2026 4:00	0	31303
8/11/2026 3:00	0	31303
8/11/2026 2:00	0	31303
8/11/2026 1:00	0	31303
8/11/2026 0:00	10	31303
8/10/2026 23:00	0	31300
8/10/2026 22:00	10	31300
8/10/2026 21:00	10	31287
8/10/2026 20:00	0	31280
8/10/2026 19:00	10	31280
8/10/2026 18:00	0	31270
8/10/2026 17:00	0	31270
8/10/2026 16:00	0	31270
8/10/2026 15:00	0	31270
8/10/2026 14:00	0	31270
8/10/2026 13:00	0	31264
8/10/2026 12:00	0	31264
8/10/2026 11:00	0	31264
8/10/2026 10:00	0	31264
8/10/2026 9:00	0	31264
8/10/2026 8:00	0	31264
8/10/2026 7:00	0	31264
8/10/2026 6:00	0	31264
8/10/2026 5:00	0	31264
8/10/2026 4:00	0	31264
8/10/2026 3:00	10	31264
8/10/2026 2:00	0	31260
8/10/2026 1:00	0	31260
8/10/2026 0:00	0	31260
8/9/2026 23:00	0	31260
8/9/2026 22:00	0	31260
8/9/2026 21:00	0	31260
8/9/2026 20:00	0	31260
8/9/2026 19:00	10	31260
8/9/2026 18:00	10	31250
8/9/2026 17:00	10	31238
8/9/2026 16:00	20	31230
8/9/2026 15:00	0	31210
8/9/2026 14:00	10	31210
8/9/2026 13:00	0	31200
8/9/2026 12:00	0	31200
8/9/2026 11:00	0	31200

8/9/2026 10:00	0	31200
8/9/2026 9:00	0	31194
8/9/2026 8:00	0	31194
8/9/2026 7:00	0	31194
8/9/2026 6:00	0	31194
8/9/2026 5:00	0	31194
8/9/2026 4:00	0	31194
8/9/2026 3:00	0	31194
8/9/2026 2:00	0	31194
8/9/2026 1:00	0	31194
8/9/2026 0:00	0	31194
8/8/2026 23:00	0	31194
8/8/2026 22:00	10	31194
8/8/2026 21:00	0	31190
8/8/2026 20:00	0	31190
8/8/2026 19:00	0	31190
8/8/2026 18:00	0	31190
8/8/2026 17:00	0	31190
8/8/2026 16:00	20	31190
8/8/2026 15:00	30	31170
8/8/2026 14:00	0	31140
8/8/2026 13:00	40	31140
8/8/2026 12:00	10	31100
8/8/2026 11:00	30	31090
8/8/2026 10:00	10	31060
8/8/2026 9:00	10	31041
8/8/2026 8:00	0	31040
8/8/2026 7:00	0	31040
8/8/2026 6:00	0	31040
8/8/2026 5:00	0	31039
8/8/2026 4:00	0	31039
8/8/2026 3:00	0	31039
8/8/2026 2:00	0	31039
8/8/2026 1:00	0	31039
8/8/2026 0:00	0	31039
8/7/2026 23:00	0	31039
8/7/2026 22:00	0	31039
8/7/2026 21:00	10	31035
8/7/2026 20:00	0	31030
8/7/2026 19:00	0	31030
8/7/2026 18:00	0	31030
8/7/2026 17:00	0	31023
8/7/2026 16:00	0	31023
8/7/2026 15:00	0	31023

8/7/2026 14:00	0	31023
8/7/2026 13:00	0	31023
8/7/2026 12:00	0	31023
8/7/2026 11:00	0	31023
8/7/2026 10:00	0	31023
8/7/2026 9:00	0	31023
8/7/2026 8:00	10	31023
8/7/2026 7:00	0	31020
8/7/2026 6:00	0	31020
8/7/2026 5:00	0	31020
8/7/2026 4:00	0	31020
8/7/2026 3:00	0	31020
8/7/2026 2:00	0	31020
8/7/2026 1:00	0	31020
8/7/2026 0:00	0	31020
8/6/2026 23:00	0	31020
8/6/2026 22:00	10	31020
8/6/2026 21:00	10	31010
8/6/2026 20:00	20	31000
8/6/2026 19:00	20	30980
8/6/2026 18:00	0	30960
8/6/2026 17:00	0	30960
8/6/2026 16:00	0	30960
8/6/2026 15:00	0	30960
8/6/2026 14:00	0	30960
8/6/2026 13:00	0	30960
8/6/2026 12:00	0	30960
8/6/2026 11:00	0	30960
8/6/2026 10:00	0	30960
8/6/2026 9:00	0	30960
8/6/2026 8:00	0	30960
8/6/2026 7:00	10	30960
8/6/2026 6:00	0	30950
8/6/2026 5:00	0	30950
8/6/2026 4:00	0	30950
8/6/2026 3:00	0	30950
8/6/2026 2:00	0	30950
8/6/2026 1:00	0	30948
8/6/2026 0:00	0	30948
8/5/2026 23:00	20	30948
8/5/2026 22:00	0	30930
8/5/2026 21:00	0	30930
8/5/2026 20:00	0	30930
8/5/2026 19:00	0	30930

8/5/2026 18:00	0	30930
8/5/2026 17:00	0	30924
8/5/2026 16:00	0	30924
8/5/2026 15:00	0	30924
8/5/2026 14:00	0	30924
8/5/2026 13:00	0	30924
8/5/2026 12:00	0	30924
8/5/2026 11:00	0	30924
8/5/2026 10:00	0	30924
8/5/2026 9:00	0	30922
8/5/2026 8:00	0	30922
8/5/2026 7:00	20	30922
8/5/2026 6:00	0	30910
8/5/2026 5:00	0	30904
8/5/2026 4:00	0	30904
8/5/2026 3:00	0	30904
8/5/2026 2:00	0	30904
8/5/2026 1:00	0	30904
8/5/2026 0:00	0	30904
8/4/2026 23:00	0	30904
8/4/2026 22:00	0	30904
8/4/2026 21:00	0	30904
8/4/2026 20:00	20	30904
8/4/2026 19:00	0	30890
8/4/2026 18:00	0	30890
8/4/2026 17:00	0	30885
8/4/2026 16:00	0	30885
8/4/2026 15:00	0	30885
8/4/2026 14:00	0	30885
8/4/2026 13:00	0	30885
8/4/2026 12:00	0	30885
8/4/2026 11:00	0	30885
8/4/2026 10:00	0	30885
8/4/2026 9:00	0	30883
8/4/2026 8:00	0	30883
8/4/2026 7:00	20	30883
8/4/2026 6:00	0	30870
8/4/2026 5:00	0	30860
8/4/2026 4:00	0	30860
8/4/2026 3:00	0	30860
8/4/2026 2:00	0	30860
8/4/2026 1:00	0	30860
8/4/2026 0:00	0	30860
8/3/2026 23:00	10	30860

8/3/2026 22:00	0	30860
8/3/2026 21:00	0	30860
8/3/2026 20:00	0	30860
8/3/2026 19:00	0	30860
8/3/2026 18:00	10	30860
8/3/2026 17:00	0	30849
8/3/2026 16:00	0	30849
8/3/2026 15:00	0	30849
8/3/2026 14:00	10	30849
8/3/2026 13:00	0	30839
8/3/2026 12:00	0	30839
8/3/2026 11:00	0	30839
8/3/2026 10:00	10	30839
8/3/2026 9:00	50	30830
8/3/2026 8:00	10	30780
8/3/2026 7:00	10	30770
8/3/2026 6:00	0	30760
8/3/2026 5:00	0	30758
8/3/2026 4:00	0	30758
8/3/2026 3:00	0	30758
8/3/2026 2:00	0	30758
8/3/2026 1:00	0	30758
8/3/2026 0:00	0	30758

Usage Report

August 11, 2026 – August 18, 2026

Intervals (EDT)	Consumption (Gal) - Usage	Consumption (Gal) - Reading
8/18/2026 9:00	0	31815
8/18/2026 8:00	0	31815
8/18/2026 7:00	0	31815
8/18/2026 6:00	0	31815
8/18/2026 5:00	0	31815
8/18/2026 4:00	0	31815
8/18/2026 3:00	0	31815
8/18/2026 2:00	0	31815
8/18/2026 1:00	0	31815
8/18/2026 0:00	10	31815
8/17/2026 23:00	40	31810
8/17/2026 22:00	0	31770
8/17/2026 21:00	0	31770
8/17/2026 20:00	0	31770
8/17/2026 19:00	10	31770
8/17/2026 18:00	0	31760
8/17/2026 17:00	0	31757
8/17/2026 16:00	0	31757
8/17/2026 15:00	20	31757
8/17/2026 14:00	10	31740
8/17/2026 13:00	0	31720
8/17/2026 12:00	10	31720
8/17/2026 11:00	0	31720
8/17/2026 10:00	0	31720
8/17/2026 9:00	0	31720
8/17/2026 8:00	0	31720
8/17/2026 7:00	0	31720
8/17/2026 6:00	0	31720
8/17/2026 5:00	0	31720
8/17/2026 4:00	0	31720
8/17/2026 3:00	0	31720
8/17/2026 2:00	0	31720
8/17/2026 1:00	0	31712
8/17/2026 0:00	10	31712
8/16/2026 23:00	0	31710
8/16/2026 22:00	0	31710
8/16/2026 21:00	0	31710
8/16/2026 20:00	0	31710
8/16/2026 19:00	0	31710
8/16/2026 18:00	0	31710
8/16/2026 17:00	0	31704
8/16/2026 16:00	0	31704
8/16/2026 15:00	0	31704

8/16/2026 14:00	0	31704
8/16/2026 13:00	0	31704
8/16/2026 12:00	0	31704
8/16/2026 11:00	10	31704
8/16/2026 10:00	0	31700
8/16/2026 9:00	0	31694
8/16/2026 8:00	0	31694
8/16/2026 7:00	0	31694
8/16/2026 6:00	0	31694
8/16/2026 5:00	0	31694
8/16/2026 4:00	0	31694
8/16/2026 3:00	0	31694
8/16/2026 2:00	0	31694
8/16/2026 1:00	0	31691
8/16/2026 0:00	10	31691
8/15/2026 23:00	0	31690
8/15/2026 22:00	20	31690
8/15/2026 21:00	0	31662
8/15/2026 20:00	0	31662
8/15/2026 19:00	10	31662
8/15/2026 18:00	0	31660
8/15/2026 17:00	0	31660
8/15/2026 16:00	0	31660
8/15/2026 15:00	0	31660
8/15/2026 14:00	0	31660
8/15/2026 13:00	0	31656
8/15/2026 12:00	0	31656
8/15/2026 11:00	0	31656
8/15/2026 10:00	0	31656
8/15/2026 9:00	0	31656
8/15/2026 8:00	0	31656
8/15/2026 7:00	0	31656
8/15/2026 6:00	0	31656
8/15/2026 5:00	0	31651
8/15/2026 4:00	0	31651
8/15/2026 3:00	0	31651
8/15/2026 2:00	0	31651
8/15/2026 1:00	0	31650
8/15/2026 0:00	0	31650
8/14/2026 23:00	10	31650
8/14/2026 22:00	10	31650
8/14/2026 21:00	10	31634
8/14/2026 20:00	0	31630
8/14/2026 19:00	20	31630

8/14/2026 18:00	20	31610
8/14/2026 17:00	0	31590
8/14/2026 16:00	0	31590
8/14/2026 15:00	0	31590
8/14/2026 14:00	0	31590
8/14/2026 13:00	0	31581
8/14/2026 12:00	0	31581
8/14/2026 11:00	0	31581
8/14/2026 10:00	30	31581
8/14/2026 9:00	10	31554
8/14/2026 8:00	0	31550
8/14/2026 7:00	0	31550
8/14/2026 6:00	0	31550
8/14/2026 5:00	0	31542
8/14/2026 4:00	0	31542
8/14/2026 3:00	0	31542
8/14/2026 2:00	0	31542
8/14/2026 1:00	0	31541
8/14/2026 0:00	0	31541
8/13/2026 23:00	10	31541
8/13/2026 22:00	0	31540
8/13/2026 21:00	0	31540
8/13/2026 20:00	0	31540
8/13/2026 19:00	0	31540
8/13/2026 18:00	10	31540
8/13/2026 17:00	0	31526
8/13/2026 16:00	0	31526
8/13/2026 15:00	20	31526
8/13/2026 14:00	20	31510
8/13/2026 13:00	0	31489
8/13/2026 12:00	0	31489
8/13/2026 11:00	0	31489
8/13/2026 10:00	0	31489
8/13/2026 9:00	0	31488
8/13/2026 8:00	0	31488
8/13/2026 7:00	0	31488
8/13/2026 6:00	0	31488
8/13/2026 5:00	0	31484
8/13/2026 4:00	0	31484
8/13/2026 3:00	0	31484
8/13/2026 2:00	0	31484
8/13/2026 1:00	0	31484
8/13/2026 0:00	0	31484
8/12/2026 23:00	0	31484

8/12/2026 22:00	0	31484
8/12/2026 21:00	20	31480
8/12/2026 20:00	20	31470
8/12/2026 19:00	30	31450
8/12/2026 18:00	10	31420
8/12/2026 17:00	0	31407
8/12/2026 16:00	0	31407
8/12/2026 15:00	0	31407
8/12/2026 14:00	0	31407
8/12/2026 13:00	0	31407
8/12/2026 12:00	0	31407
8/12/2026 11:00	0	31407
8/12/2026 10:00	0	31407
8/12/2026 9:00	0	31403
8/12/2026 8:00	10	31403
8/12/2026 7:00	0	31400
8/12/2026 6:00	0	31400
8/12/2026 5:00	0	31400
8/12/2026 4:00	0	31400
8/12/2026 3:00	0	31400
8/12/2026 2:00	0	31400
8/12/2026 1:00	0	31398
8/12/2026 0:00	0	31398
8/11/2026 23:00	0	31398
8/11/2026 22:00	0	31398
8/11/2026 21:00	20	31398
8/11/2026 20:00	0	31380
8/11/2026 19:00	0	31380
8/11/2026 18:00	50	31380
8/11/2026 17:00	20	31323
8/11/2026 16:00	0	31310
8/11/2026 15:00	0	31310
8/11/2026 14:00	0	31310
8/11/2026 13:00	0	31310
8/11/2026 12:00	0	31310
8/11/2026 11:00	0	31310
8/11/2026 10:00	0	31310
8/11/2026 9:00	0	31310
8/11/2026 8:00	0	31310
8/11/2026 7:00	0	31310
8/11/2026 6:00	0	31310
8/11/2026 5:00	0	31303
8/11/2026 4:00	0	31303
8/11/2026 3:00	0	31303