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January 13, 2026

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

Re: *Graves County Water District*
Case No. 2025-00060

Dear Ms. Bridwell:

Pursuant to the Public Service Commission's Order of December 23, 2025 in the above-referenced proceeding, Graves County Water District ("the District") submits revised tariff sheets reflecting the rates authorized therein.

In its Order, the Public Service Commission ("the Commission") directed that the District to "file proper notice in accordance with 807 KAR 5:011 for the revised Meter Set/Tap On Fees approved in this case." The Order did not explain or define "proper notice."

Based upon its review of 807 KAR 5:011, the District believes **all rates** set forth in the enclosed tariff sheets became effective as of December 23, 2025. 807 KAR 5:011, Section 6(2)(a) provides that "[a] new tariff or revised sheet of an existing tariff shall be issued and placed into effect by Order of the commission." The Commission has reviewed and found **all rates** contained in the submitted sheets to be fair, just, and reasonable and ordered them effective as of December 23, 2025. See Order of December 23, 2025 at 34 (Ordering Paragraph 3).

In its Order of December 23, 2025, the Commission asserts that the District failed to provide the required public notice of proposed revisions to its Meter Set/Tap-On Fees. The record and past Commission decisions do support this assertion. The District did not propose revising its Meter Set/Tap-On Fees. Its application is silent on these fees. During discovery, Commission Staff requested information regarding the District's costs to make meter connections and then, in its report to the Commission recommended that the District's meter connection fees be increased.¹

¹ Commission Staff Report at 9-10.

In its Order of December 23, 2025, the Commission accepted these recommendations, finding that the Commission Staff-recommended fees “reflect[ed] the current expenses incurred to install new taps” and were necessary “to prevent an under-recovery” of the costs to provide such services. Order at 32. Based upon Commission Staff’s recommendation, the Commission also ordered increases to several non-recurring charges that were not requested.²

As the District neither proposed nor requested these revisions but was ordered to charge the revised charges, 807 KAR 5:011 does not require it to provide public notice of the revisions. 807 KAR 5:011, Section 6(2) states:

A new tariff or revised sheet of an existing tariff shall be issued and placed into effect by:

(a) Order of the commission; or

(b) Issuing and filing with the commission a new tariff or revised sheet of an existing tariff and providing notice to the public in accordance with Section 8 of this administrative regulation and statutory notice to the commission.

Section 6(2)(a) refers to a rate or charge that the Commission has ordered. It does not require public notice of that action. In contrast, Section 6(2)(b) addresses the situation in which a utility proposes a new or revised rate. It requires the utility to provide public notice as specified in Section 8 of 807 KAR 5:011 and statutory notice to the Commission as KRS 278.180 requires. The content of this public notice, as prescribed in 807 KAR 5:011, Section 8(4), addresses a rate that a utility proposes to charge, not a rate that the Commission has already ordered. For example, Section 8(4) requires the public notice to state the “**proposed** effective date and the date the **proposed rates** are expected to be filed with the commission,” and the present and **proposed rates**. It further requires the notice to state that comments may be filed with the Commission, that a person may request intervention, and that the Commission may take final action on the filing within 30 days of the filing.

In numerous prior cases, the Commission has not required a utility to give notice of the approval of rates that the utility did not request but that Commission Staff recommended or the Commission ordered on their own motion.³ Even in the present case, the requirement for public

² The Commission approved increases to the District’s Tampering Fee, Connection Fee, Reconnection Fee, and Service Charge. Order of December 23, 2025 at 29-31. In its Application, the District did not request any changes in its non-recurring charges. In response to Commission Staff’s recommendation that several of these charges be reduced, the District objected to Commission Staff’s recommendations, arguing that they conflicted with prior Commission decisions.

³ See, e.g., *Electronic Application of Hyden-Leslie County Water District for An Alternative Rate Adjustment*, Case No. 2020-00141 (Ky. PSC Nov. 6, 2020) (water loss control surcharge); *Electronic Application of Dexter-Almo Heights Water District for A Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2024-00273 (Ky. PSC Oct. 20, 2025) (tap-

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notice appears unevenly applied. Notice of increases in Meter Set/Tap-On Fees is deemed necessary but notice of increases in numerous non-recurring charges is not. The Order of December 23, 2025 provides no explanation for why public notice is required.⁴

It is unclear the purpose served through publication of notice of the approved Meter Set/Tap-On Fees. Commission Staff has already thoroughly reviewed the utility's cost to set a meter. The Commission has made a similar review and approved the charge. What benefit is expected to be gained from or additional action contemplated as a result of the publication of notice?

The District has or will take several actions to advise the public of the recently approved rates. It has with this filing submitted revised tariff sheets that will be readily available to the public through the Commission's website. It will make these rates available to the public through the Mayfield Electric and Water System website. Finally, the District will ensure that each customer has access to receive a copy of the District's rate schedules at least once annually as 807 KAR 5:006, Section 7(1)(b) requires. Given these measures, the public will have adequate notice of **all the District's rates**.

Should the Commission reject the arguments set forth in this letter and require publication of notice of the approved Meter Set/Tap-On Fees, the District will require some guidance as to the contents of such notice. As noted above, the provisions of 807 KAR 5:011, Section 8(4) are not appropriate and, if followed, will create public confusion.

on fees); *Electronic Application of Western Fleming County Water Association for A Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2024-00275 (Ky. PSC Mar. 28, 2025) (tap-on fees and non-recurring charges); *Electronic Application of Crittenden-Livingston Water District for An Alternative Rate Filing Pursuant to 807 KAR 5:076*, Case No. 2024-00278 (Ky. PSC Nov. 4, 2025) (tap-on fee and non-recurring charge); *Electronic Application of Western Rockcastle County Water Association, Inc. for A Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2025-00001 (Ky. PSC Aug. 12, 2025) (tap fees); *Electronic Application of Allen County Water District for A Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2025-00014 (Ky. PSC July 18, 2025) (tap-on fees and non-recurring charges); *Electronic Application of Bath County Water District for A Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2025-00132 (Ky. PSC Nov. 3, 2025) (non-recurring charges); *Electronic Application of McKinney Water District for A Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2025-00014 (Ky. PSC Dec. 4, 2025) (tap-on fees and non-recurring charges).

⁴ The District has already provided the public with adequate notice. At the time of filing its application, it published notice of the filing which advised the public of the requested rate adjustment but also stated:

The rates contained in this notice are the rates proposed by Graves County Water District. However, the Public Service Commission may order rates to be charged that differ from these proposed rates. Such action may result in rates for consumers other than the rates shown in this notice.

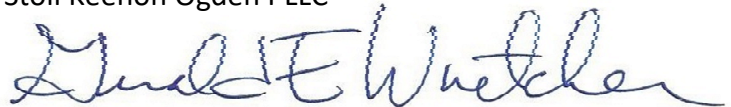
This notice gave the public notice of the proposed rate adjustment and the Commission proceeding and further advised the public of possibility of other adjustments to the District's rates, including its Meter Set/Tap-on fees and non-recurring charges.

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Please be advised that the District intends to present the question of public notice to the Commission in a motion for rehearing, which it expects to file with the Commission no later than January 15, 2026.

Sincerely,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink, reading "Gerald E. Wuetcher". The signature is written in a cursive, flowing style with a large initial "G" and "W".

Gerald E. Wuetcher

Enclosures