west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street, SE
Charleston, WV 25304
Phone: 304-926-0495 / Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary
dep.wv.gov

MEMORANDUM

To: Brad Sergent, Chair
Meredith J. Vance, Director, Environmental Engineering Division, BPH

From: Katheryn Emery, P.E., Program Manager
Sewer Technical Review Committee

Date: February 18, 2026

Subject: City or St. Albans
IJDC Application - 2026W-2742
Water Systems Improvement Project

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1. This committee has reviewed the preliminary application and engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15A. It has been determined that the proposed project is:

   a. √ Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective, environmentally sound alternative for solving the water needs in this area.

   b. ___ Not consistent with the Act and may not be the most cost effective, environmentally sound alternative for solving the wastewater needs in this area.

   c. ___ Same as (a) above except that certain issues need to be addressed prior to design and construction as the attached comments indicate.

2. Our recommendation is that:

   a. √ The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.

   b. ___ The Funding Committee should recommend that the Council approve the proposed project and its funding plan.

c. ___ The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the engineering report. The proposed project should be tabled for the consultant to address technical comments.

d. ___ This project should be referred to the Consolidation Committee.

3. Other remarks:

The proposed project will include replacement of every water meter with a radio-read meter, installing a data collection network, implementing advanced meter infrastructure (AMI) software, and identifying service line materials. The project will address water meters that have exceeded their useful life, improve operational efficiency and meter accuracy, and help identify service line materials within the system to complete the lead service line (LSL) inventory.

The total project cost is $4,029,000 and the City intends to pursue a $4,029,000 WVIJDC Loan (3%, 20 years). The proposed monthly rate for 3,400 gallons is $74.10 (1.7% MHI) (based on the Combined Application).

The City should perform a cybersecurity vulnerability assessment.

The City should also reach out to the DWSRF program regarding availability of LSL funding for the inventory portion of the project.

Preliminary Project Ratings:
Public Health Benefits: 0
Compliance with Standards: 5

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MEMORANDUM

TO: Katheryn Emery, P.E., Program Manager, DWWM

FROM: Spencer Fultineer, DWWM

DATE: February 4, 2026

SUBJECT: City of St. Albans
Advanced Metering Infrastructure
IJDC No. 2026W-2742

RECOMMENDATION

The IJDC application and Preliminary Engineering Report (PER), prepared by The Chapman Technical Group for the above referenced project, have been reviewed and are technically feasible.

PROJECT DESCRIPTION

The Water Treatment Plant and Water Distribution System of the City of St. Albans Municipal Utility Commission (MUC) retrieves water from the Coal River and serves approximately 6,200 customers throughout the City. They treat approximately 1,238,000 gallons per day.

The purpose of this project is to improve meter reading accuracy and the operation of the system, which involves upgrading every water meter. This will involve the following: replacing every water meter with a radio-read meter, which includes 6,161 ⅝”x ¾” meters, forty-nine 1” meters, fourteen 1-½” meters, twenty-four 2” meters, one 3” meter, and two 4” meters; installing a data collection network; implementing advanced meter infrastructure (AMI) software; and identifying service line materials.

The proposed cost for this project is $4,029,000.00. The City will pursue a funding scenario of a $4,029,000.00 IJDC Loan (3%, 20 years). The proposed monthly rate for 3,400 gallons is $74.10 (1.7% MHI) and represents a rate increase of approximately 0.4% (based on the Combined Application).

NEED FOR PROJECT

The City's existing water meters have reached or exceeded their expected useful lives, resulting in decreased meter reading accuracy, increased maintenance needs, and reduced operational efficiency. The inaccurate meter readings have caused errors in customer billing, resulting in billing complaints and decreased customer confidence in the City of St. Albans MUC. Replacing every water meter with a radio-read meter and installing a data collection network and software should improve meter reading accuracy and customer service.

The MUC faces consistent difficulty maintaining employment of meter readers. Replacing every meter with radio-read meters should reduce the reliance on manual meter reading and improve operational efficiency.

The City reported approximately 130,127,000 gallons of unaccounted water loss for the year 2024, which equates to 28.8% of the total volume of treated water pumped. Additionally, the MUC has reported being able to identify the materials used for approximately 13% of their service lines, leaving approximately 87% of service lines classified as "Unknown Material." The MUC intends to complete the Lead Service Line Inventory and is currently developing the comprehensive Geographic Information System. Installing radio-read meters and a data collection network will contribute to the ongoing efforts of the MUC to improve unaccounted for water loss and identify service line materials.

DEFICIENCIES/COMMENTS

- Using the Combined Application, the Total Engineering Design Fees are well below the ASCE Curve.

Preliminary Project Ratings:

Public Health Benefits	0
Compliance with Standards	5

Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812
Charleston, West Virginia 25323

Phone: (304) 340-0300
Fax: (304) 340-0325

February 6, 2026

Meredith J. Vance
Office of Environmental Health Services
350 Capitol Street, Room 313
Charleston, West Virginia 25301-3713

Re: Public Service Commission Staff Review Comments
Application No. 2026W-2742
St. Albans, City of – Water Distribution System Upgrades (Meters)
Infrastructure Preliminary Application

Dear Ms. Vance:

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of Technical Staff's comments enclosed herewith, we are recommending the application be:

__X__ Forwarded to the Funding Committee

_____ Forwarded to the Consolidation Committee

_____ Returned to the Applicant

Please advise if you have any questions.

Sincerely,

Brandon Crace

Brandon Crace
Engineering Division

Enclosures

PUBLIC SERVICE COMMISSION STAFF
TECHNICAL REVIEW

DATE: February 6, 2026

PROJECT SPONSOR: CITY OF ST. ALBANS – (WATER)

PROJECT SUMMARY: The City of St. Albans is proposing to make improvements to its water distribution system.

PROPOSED FUNDING: IJDC Loan $ 4,029,000 (3%, 20 years)

CURRENT RATES:	$55.50	3,400 gallons
	$63.00	4,000 gallons
PROPOSED RATES:	$74.10	3,400 gallons
	$84.00	4,000 gallons

Application No. 2026W-2742

RECOMMENDATION:
__X__ Forward to the Funding Committee
____ Forward to the Consolidation Committee
____ Return to the Applicant

FINANCIAL: Alex Kovarik

1. Current rates ($55.50 for 3,400 gallons) are above the rate attributable to 1.25% ($53.09) of the Median Household Income (MHI), but below the rates attributable to 1.5% ($63.71), 1.75% ($74.33) and 2.0% ($84.95) of the MHI. Increasing current rates to 1.5%, 1.75% and 2.0% of the MHI would provide additional revenues of $616,821, $1,414,476 and $2,212,131 respectively.

2. Using Scenario 1, the preferred funding package consisting of an IJDC Loan of $4,029,000 at 3% for 20 years, proposed rates ($74.10 for 3,400 gallons) will provide a cash flow surplus of $81,796 and debt service coverage of 143.55%.

3. Using the Scenario 2 alternate loan package of $4,029,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rates ($79.51 for 3,400 gallons) will provide a cash flow surplus of $86,342 and debt service coverage of 138.48%.

4. NOTES TO COMMENTS

A. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package), Attachment B for Scenario 2 (Loan Package) and Attachment C for Scenario 3 (Alternate Funding Package).

B. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2025, and the applicant's Rule 42 Exhibit submitted with the application.

C. Staff notes the Applicants filing includes the impact of prior, pending and subsequent projects to be undertaken. The project which is the subject of this review is identified as Phase 2 of a three-phase project and the applicable Cash Flow Analysis reflects increased rates for each project phase. The Applicant's preferred rates for this project, Phase 2, are $74.10 for 3,400 gallons, but also includes proforma rates for Phase 3 of $87.30 for 3,400 gallons. Staff analysis only takes into consideration the impact of Phase 2 and the preferred rates of $74.10 for 3,400 gallons.

D. Staff has included a Scenario 3 analysis. Staff notes that the project sponsor is proposing an IJDC Loan at 3% for 20 years. Since proposed target rates of $74.10 (3,400 gallons) are greater than 1.5% ($63.71) and less than 2% ($84.95) of the MHI, the terms of this proposed IJDC loan would typically be 2% for 30 years, for the preferred funding package. If the preferred funding package is adjusted for this change, proposed target rates ($74.10 for 3,400 gallons) would provide a cash flow surplus of $181,805 and debt service coverage of 151.92%.

E. Senate Bill 234, effective June 12, 2015, required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11.

F. The City of St. Albans should carefully evaluate its revenue requirements before passing a rate ordinance in order to ensure that rates are sufficient to provide a reasonable surplus and meet coverage requirements. Staff

notes that the City is a political subdivision of the state and it has at least 4,500 customers and annual gross revenues of $3 million or more. Therefore, in accordance with Senate Bill 234, effective June 12, 2015, the Commission has no jurisdiction regarding the City's rates pursuant to WV Code 24-2-4b. However, the Commission does have jurisdiction pursuant to WV Code 24-2-1 (b)(6) for the investigation and resolution of disputes involving political subdivisions of the state regarding inter-utility agreements, rates, fees and charges, service areas and contested utility combinations.

ENGINEERING: Brandon Crace

1. Pursuant to House Bill 2742 passed in the 2025 Legislative Session, this project will not require a Certificate of Convenience and Necessity from the PSC.

2. Scope: The City of St. Albans is proposing to make improvements to its water distribution system. The proposed project scope includes: an audit of existing water meters, a new data collection network, commissioning and start-up of new meter system, training personnel, integration of the existing billing system, first year of software, 6161 water meters (5/8" x 3/4"), 49 water meters (1"), 14 water meters (1-1/2"), 24 water meters (2"), 1 water meter (3"), 2 water meters (4"), project management, and coordination. The estimated construction cost is $3,300,000 (includes 10% construction contingency), and the estimated total project cost is $4,029,000 (includes 10% project contingency).

   Need: The PER indicates "…the existing water meters have reached their expected useful lives…", and "…a lack of interest in the workforce across the public utility industry…" are reasons for pursuing this infrastructure project. The PER states that the proposed scope of work will improve meter accuracy, increase operational efficiency, and reduce unaccounted for water.

   Customer Density: This project is an upgrade project; therefore, customer density will remain unchanged.

   Cost per Customer: Based upon the estimated total project cost is $4,029,000, and having approximately 6011 customers, the cost per customer will be approximately $670. The cost per customer in terms of proposed borrowing is $670, as the proposed funding is 100% loan.

3. Project Feasibility: The project appears to be technically feasible and poses little technical risk.

4. Project Alternatives: The PER did not include an evaluation of alternatives.

5. Consolidation: There are no consolidation opportunities presented by this project.

6. Operation and Maintenance (O&M) Expenses: The PER did not include a breakdown or discussion of changes to O&M expenses. However, the Engineer did indicate that it is likely that any reduction in personnel expenses will be offset by the necessary annual software license.

7. Engineering Agreement: The application includes information to determine compliance with West Virginia Code §5G-1-1, *et seq*. Total technical services (engineering) costs for the project are $447,000, which is equal to 13.55% of the construction cost of $3,300,000 (includes 10.0% construction contingency).

8. Deficiencies/Comments:
   - The Engineer stated that the number of meters indicated in the construction cost estimate is based on a review of current billing software, and the actual number of meters to be replaced will be more accurately reflected following the proposed water meter audit.

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2742
February 6, 2026

PREFERRED FUNDING PACKAGE
SCENARIO 1

		Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		4,268,980	5,399,477	(423,500)	(1)	4,975,978
Other Operating Revenue		102,814	101,000	-		101,000
SB 234 Annual Working Cash Collections				423,500	(2)	423,500
Interest Income & Other Misc.		353,374	353,374	-		353,374
Total Cash Available		4,725,168	5,853,851	-		5,853,852
OPERATING DEDUCTIONS						
Operating Expenses		3,004,910	3,388,000	-		3,388,000
Taxes		89,844	98,000	-		98,000
Total Cash Requirements Before Debt Service		3,094,754	3,486,000	-		3,486,000
Cash Available for Debt Servi	(A)	1,630,414	2,367,851	-		2,367,852
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	788,438	1,657,167	(7,644)	(3)	1,649,523
Other Debt		-	-	-		-
Reserve Account @ 10%		-	86,873	(765)	(4)	86,108
Renewal & Replacement Fund (2.5%)		118,129	146,346	(19,422)	(5)	126,924
Total Debt Service Requirement		906,567	1,890,386	(27,831)		1,862,556
SB 234 Cash Working Capital		375,614	423,500	-		423,500
Remaining Cash		348,233	53,965	27,831		81,796
Percent Coverage	(A) / (B)	206.79%	142.89%			143.55%
Average rate for 3,400 gallons		$ 55.50	$ 74.10	$ -		$ 74.10
Average rate for 4,000 gallons		$ 63.00	$ 84.00	$ -		$ 84.00

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2742

Attachment A
PREFERRED FUNDING PACKAGE
SCENARIO 1

Staff Adjustments

	Adjustment Description		$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**4,975,978**	**(423,500)**
		Per Application with Project	**5,399,477**	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**423,500**	**423,500**
		Per Application with Project	**-**	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	**Principal & Interest**	**Per Staff Analysis**	**1,649,523**	**(7,644)**
		Per Application with Project	**1,657,167**	
	The difference in P&I is related to Staff's calculation of a loan of $4,029,000 for 20 years at 3%.			
(4)	**Reserve Account @ 10%**	**Per Staff Analysis**	**86,108**	**(765)**
		Per Application with Project	**86,873**	
	Staff assumed a 10% reserve on the new debt.			
(5)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**126,924**	**(19,422)**
		Per Application with Project	**146,346**	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2742
February 6, 2026

LOAN PACKAGE
SCENARIO 2

		Max Rate Going Level Per Application Before Project	Max Rate Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		4,268,980	5,792,333	(423,500)	(1)	5,368,834
Other Operating Revenue		102,814	101,000	-		101,000
SB 234 Annual Working Cash Collections				423,500	(2)	423,500
Interest Income & Other Misc.		353,374	353,374	-		353,374
Total Cash Available		4,725,168	6,246,707	-		6,246,708
OPERATING DEDUCTIONS						
Operating Expenses		3,004,910	3,388,000	-		3,388,000
Taxes		89,844	98,000	-		98,000
Total Cash Requirements Before Debt Service		3,094,754	3,486,000	-		3,486,000
Cash Available for Debt Servi	(A)	1,630,414	2,760,707	-		2,760,708
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	788,438	1,991,792	1,811	(3)	1,993,603
Other Debt		-	-	-		-
Reserve Account @ 10%		-	120,335	182	(4)	120,517
Renewal & Replacement Fund (2.5%)		118,129	156,168	(19,422)	(5)	136,746
Total Debt Service Requirement		906,567	2,268,295	(17,429)		2,250,866
SB 234 Cash Working Capital		375,614	423,500	-		423,500
Remaining Cash		348,233	68,912	17,429		86,342
Percent Coverage	(A) / (B)	206.79%	138.60%			138.48%
Average rate for 3,400 gallons		$ 55.50	$ 79.51	$ -		$ 79.51
Average rate for 4,000 gallons		$ 63.00	$ 90.25	$ -		$ 90.25

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2742

Attachment B
LOAN PACKAGE
SCENARIO 2

Staff Adjustments

	Adjustment Description		$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**5,368,834**	**(423,500)**
		Per Application with Project	**5,792,333**	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**423,500**	**423,500**
		Per Application with Project	**-**	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	**Principal & Interest**	**Per Staff Analysis**	**1,993,603**	**1,811**
		Per Application with Project	**1,991,792**	
	The difference in P&I is related to Staff's calculation of a loan of $4,029,000 for 40 years (funded over 38 years) at 5%.			
(4)	**Reserve Account @ 10%**	**Per Staff Analysis**	**120,517**	**182**
		Per Application with Project	**120,335**	
	Staff assumed a 10% reserve on the new debt.			
(5)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**136,746**	**(19,422)**
		Per Application with Project	**156,168**	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2742
February 6, 2026

ALTERNATE FUNDING PACKAGE
SCENARIO 3

		Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		4,268,980	5,399,477	(423,500)	(1)	4,975,978
Other Operating Revenue		102,814	101,000	-		101,000
SB 234 Annual Working Cash Collections				423,500	(2)	423,500
Interest Income & Other Misc.		353,374	353,374	-		353,374
Total Cash Available		4,725,168	5,853,851	-		5,853,852
OPERATING DEDUCTIONS						
Operating Expenses		3,004,910	3,388,000	-		3,388,000
Taxes		89,844	98,000	-		98,000
Total Cash Requirements Before Debt Service		3,094,754	3,486,000	-		3,486,000
Cash Available for Debt Service	(A)	1,630,414	2,367,851	-		2,367,852
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	788,438	1,657,167	(98,561)	(3)	1,558,606
Other Debt		-	-	-		-
Reserve Account @ 10%		-	86,873	(9,857)	(4)	77,016
Renewal & Replacement Fund (2.5%)		118,129	146,346	(19,422)	(5)	126,924
Total Debt Service Requirement		906,567	1,890,386	(127,840)		1,762,546
SB 234 Cash Working Capital		375,614	423,500	-		423,500
Remaining Cash		348,233	53,965	127,840		181,805
Percent Coverage	(A) / (B)	206.79%	142.89%			151.92%
Average rate for 3,400 gallons		$ 55.50	$ 74.10	$ -		$ 74.10
Average rate for 4,000 gallons		$ 63.00	$ 84.00	$ -		$ 84.00

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2742

Attachment C
ALTERNATE FUNDING PACKAGE
SCENARIO 3

Staff Adjustments

	Adjustment Description		$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**4,975,978**	**(423,500)**
		Per Application with Project	**5,399,477**	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**423,500**	**423,500**
		Per Application with Project	**-**	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	**Principal & Interest**	**Per Staff Analysis**	**1,558,606**	**(98,561)**
		Per Application with Project	**1,657,167**	
	The difference in P&I is related to Staff's calculation of a loan of $4,029,000 for 30 years at 2%.			
(4)	**Reserve Account @ 10%**	**Per Staff Analysis**	**77,016**	**(9,857)**
		Per Application with Project	**86,873**	
	Staff assumed a 10% reserve on the new debt.			
(5)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**126,924**	**(19,422)**
		Per Application with Project	**146,346**	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304-2345
Telephone Number: (304) 926-0495
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Harold D. Ward, Cabinet Secretary
www.dep.wv.gov

M E M O R A N D U M

MEMO TO: Meredith J. Vance
Office of Environmental Health Services
Bureau for Public Health

FROM: Brian D. Bailey
Technical Analyst
General Permits & Support Team

DATE: January 30, 2026

SUBJECT: Infrastructure Preliminary Application for the City of St. Albans: Meter Replacement Project in Kanawha County, WV. (2026W-2742)

We have reviewed the above referenced project application information. The City of St. Albans, discharges its backwash to its site, which is covered under WV/NPDES Site Registration No. WVG640139, and expires July 18, 2028.

If the City of St. Albans is considering repairing and painting an existing water treatment plant or storage tanks, then the scope of this project requires precautions to prevent contamination of the waters of the state. Prior to beginning any removal of old paint, the City of St. Albans should contact Mr. Brad Wright or a member of his staff at (304)-926-0499, extension 49746 for guidance in determining whether the paint to be removed is considered a hazardous waste. If so, proper containment and disposal procedures must be followed for the paint and any material associated with the sandblasting. If it is determined that the paint is not hazardous, the City of St. Albans should contact John Lockhart or a member of his staff at (304)-926-0499, extension 43821 for proper disposal options.

Construction activities with a disturbed area of one (1) acre or greater are now required to register for the NPDES Storm Water Construction General Permit No. WV0115924 that became

effective on April 6, 2024. Projects registered under the previous General Permit No. WV0115100 were automatically provided coverage under WV/NPDES General Permit No. WV0115924. For more information, they may contact Larry Board at (304)-926-0499, extension 43883.

In light of the above, we have no objection to this project as long as the appropriate provisions are taken to assure compliance with Chapter 22, Article 11, of the Code of West Virginia and any associated regulations. The responsible party may contact Mylinda Maddox (304) 926-0499 ext. 43825, should additional information be required.

BDB:mam

cc: Katheryn Emery