

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**CASE NO. 2010-00476**

**In the Matter of:**

**Application of Kentucky Water  
Service Corporation of Kentucky  
For An Adjustment of Rates**

**RECEIVED**

**MAR 23 2011**

**PUBLIC SERVICE  
COMMISSION**

**REQUEST TO INTERVENE**

Comes the undersigned, counsel for Hickman County, Kentucky, by and through its Fiscal Court, and respectfully moves the Commission to allow the HICKMAN COUNTY FISCAL COURT to intervene in the above styled action.

The Hickman County Fiscal Court voted on March 14, 2011, to file an intervention in the above styled case for the following reasons:

1. Hickman County Detention Center is the largest single consumer of water in the county and possibly in the Applicant's area of customer base. The Hickman County Detention Center, a seventy-five (75) bed jail, spends \$840.00 monthly on water. Costs for water usage by the Hickman County Detention Center for 2010 were \$10,800.00
2. Other public buildings for which the Hickman County Fiscal Court pays water usage are for 2010:
  - a. Hickman County Courthouse the sum of \$966.65
  - b. Hickman County Courthouse Annex the sum of \$494.16; and
  - c. Hickman County Road Department the sum of \$143.88

3. Higher rates will make it even more difficult to recruit new industry and retain current industry.

4. 21% of the citizens of Hickman County are over the age of 65. Most of these senior citizens are on a fixed income and increased water rates would be a substantial burden to them and may endanger their physical well being.

5. Recent population numbers show a continued decline in population. Many have indicated within the last two years that the high cost of water and sewer utilities would cause them to consider moving if possible.

The undersigned requests Hickman County Fiscal Court be allowed to intervene to present issues unique to the fiscal impact on county government, to be allowed to present expert testimony, if feasible, related to the effect of the proposed rate increase, and to be allowed to participate as a party in the above styled action.



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SUE ELLEN MORRIS  
Hickman County Attorney  
Attorney for Hickman County Fiscal Court  
Hickman County Courthouse  
110 East Clay Street, Suite D  
Clinton, KY 42031  
1-270-653-6335

#### CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing Request to Intervene was served upon Water Service Corporation of Kentucky by first class mailing, postage prepaid, to its counsel of record: John N. Hughes, Esq., 124 West Todd St., Frankfort, Kentucky, 40601, counsel for Water Service

Corporation of Kentucky, Inc. and to David Spenard, Esq., Office of the Attorney  
General, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky, 40601 **this**

21<sup>st</sup> day of March, 2011.

A handwritten signature in cursive script, reading "Sue Ellen Morris", written over a horizontal line.

Sue Ellen Morris  
Hickman County Attorney  
110 East Clay Street, Suite D.  
CLINTON, KY 42031  
1-270-653-6335