

**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**

**APR 04 2011**

**PUBLIC SERVICE  
COMMISSION**

**REQUEST TO INTERVENE**

**Comes the undersigned, counsel for the City of Clinton, and respectfully moves the Commission to allow the CITY OF CLINTON to intervene in the above styled action.**

**The Clinton City Council voted on March 7, 2011 to file an intervention in the above styled case for the following reasons:**

**1. The City of Clinton has a long relationship with the Applicant. The City sewer system has been managed by the Applicant since 1987. Applicant's duties regarding the sewer system are the overall operation and maintenance of the sewer operation for the City of Clinton, Kentucky**

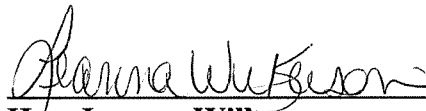
**2. The City of Clinton depends on the Applicant for calculating sewer rates. The City's sewer rates are 133% and are calculated by using the water amount usage of the water consumer and multiplying that dollar figure by 133% to obtain the sewer amount due.**

**3. The City of Clinton is a collection point for the Applicant. The City collects the water bills from the public, post payments made and makes deposits in the Applicant's account.**

4. **The City of Clinton has a contractual relationship with Applicant which requires Applicant to operate and maintain the sewer system, measure individual customer water usage and bill same. The City has had difficulty obtaining reports about correct individual usage levels and billing for sewer only customers.**

5. **There are a large number of persons in the City of Clinton who are over the age of sixty two (62). A large segment of the population of the City is on fixed income or limited income. Any increase in the water rates and subsequently the amount owed for sewer would be financially devastating to these citizens.**

**The undersigned requests City of Clinton 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.**



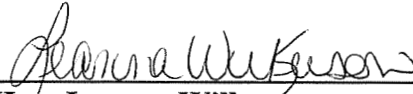
**Hon. Leanna Wilkerson**  
**City Attorney for the City of Clinton, Ky**  
**300 5<sup>th</sup> Street**  
**Fulton, KY 42041**

#### **CERTIFICATE OF SERVICE**

**I hereby certify the original of foregoing Request was served on the Kentucky Public Services Commission located at 211 Sower Blvd., Frankfort KY 40601 and 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 of Kentucky, Inc. and to David Spenard, Esq., Office of the Attorney General, 1024**

**Capital Center Drive, Suite 200, Frankfort, Kentucky, 40601 2<sup>nd</sup> day of April, 2011**

A handwritten signature in black ink, reading "Leanna Wilkerson", written over a horizontal line.

**Hon. Leanna Wilkerson**

**City Attorney for the City of Clinton, Ky**