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December 2, 2010

RECEIVED

DEC 06 2010

PUBLIC SERVICE
COMMISSION

Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Blvd
P.O. Box 615
Frankfort, KY 40602

Re: Proposed Adjustment of the Wholesale Water Service Rates of
the Frankfort Electric and Water Plant Board
Case No. 2010-_____

Dear Mr. Derouen:

Enclosed are the original and ten copies of the Motion for Full Intervention and Motion to Suspend Rates. Please file the original to the record of this action and return the file-stamped copy of the first page to me in the enclosed self-addressed, stamped envelope.

Thank you very much for your attention to this matter.

Yours truly,

MATHIS, RIGGS & PRATHER, P.S.C.

By: 
Donald T. Prather

DTP/pm
Enclosure
cc: Bill Eggen
Jerry Ruble
David Bowles
Dtp/wtr/us60/rate/psc ltr3

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)
WATER SERVICE RATES OF THE FRANKFORT) CASE NO. 2010-_____
ELECTRIC AND WATER PLANT BOARD)

**MOTION FOR FULL INTERVENTION
AND
MOTION TO SUSPEND RATES**

Comes North Shelby Water Company ("North Shelby") and U.S. 60 Water District of Shelby and Franklin Counties, Kentucky ("U.S. 60"), by counsel, and respectfully move that they be granted leave to fully intervene in the captioned rate case, and moves that the rate increase be suspended pending a decision in this case. As grounds for this motion, U.S. 60 states that Frankfort Electric and Water Plant Board ("Frankfort") provide almost all of the water for its customers. North Shelby purchases approximately one-half of its water from Frankfort. The proposed rate increase, if granted, would significantly increase the water rates for both North Shelby and U.S. 60's customers and therefore both utilities respectfully request full intervention in this case.

Respectfully submitted,

Mathis, Riggs & Prather, P.S.C.

By: 

Donald T. Prather
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Attorney for North Shelby and
U.S. 60

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing Motion For Full Intervention was this 3 day of December, 2010 mailed to the following:

Jim Smith, General Manager
Frankfort Electric and Water
Plant Board
PO Box 308
Frankfort, Kentucky 40602



Donald T. Prather