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December 15, 2010

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

RECEIVED

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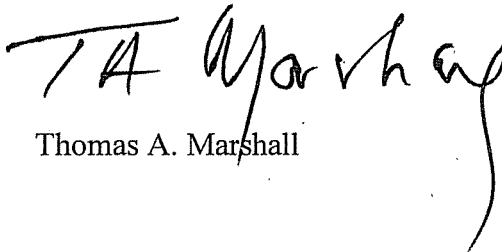
**PUBLIC SERVICE
COMMISSION**

Motion for Intervention and Suspension of Rates
on behalf of Peaks Mill Water District and Elkhorn
Water District

Dear Mr. Derouen,

Herewith are filed the original and 10 copies of the Motion for Intervention and Suspension of Rates regarding the proposed tariff filed by the Frankfort Water and Electric Plant Board on or about November 18, 2010. If additional information is needed, please contact me, Thomas A. Marshall, at 223-4723 or 682-6008. I am located in Frankfort and should be able to quickly respond. Your assistance and that of your staff is very much appreciated.

Sincerely,



Thomas A. Marshall

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. _____
ELECTRIC AND WATER PLANT BOARD)

**Motion for Full Intervention and Suspension of Proposed Rates
on behalf of Peaks Mill Water District and Elkhorn Water District**

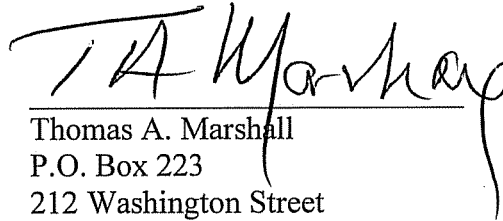
Come the Peaks Mill Water District and Elkhorn Water District (hereinafter “Districts”), by counsel, which hereby move and request that the Districts be granted full intervention in regards to the Frankfort Electric and Water Plant Board’s (“Frankfort Plant Board”) request for a rate increase, as evidenced by a proposed tariff filed on or about November 18, 2010, and that the rate or rates proposed and stated in the aforementioned tariff be suspended.

For their grounds for full intervention, the Districts state that they are wholesale water customers of the Frankfort Plant Board, and that their rates are subject to regulation by the Kentucky Public Service Commission (hereinafter “Commission”). Further, the Districts contend that it is in the best interest of their customers that the Commission review and investigate the proposed increase in regards to reasonableness and the adequacy of the justification, and that the Districts can aid in the review of the proposed rates.

The Districts request that the Commission carefully review any cost of service study or other justification that is provided in support of this most recent proposal to

increase rates, and that the Commission consider any other issue or matter that would assist in determining the reasonableness of the proposed wholesale rates.

Respectfully submitted,



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Counsel for Peaks Mill Water District
and Elkhorn Water District

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION has been sent by first-class mail, postage prepaid, on this date, December 15, 2010, to the following:

Jim Smith
General Manager
Frankfort Plant Board
317 W. Second Street
P.O. Box 308
Frankfort, KY 40602

Donald T. Prather
500 Main Street, Suite 5
Shelbyville, KY 40065
Attorney for North Shelby
Water Company and U.S. 60
Water District

Hance Price, Esq.
Counsel, Frankfort Plant Board
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