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October 19, 2006

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**PUBLIC SERVICE
COMMISSION**

Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

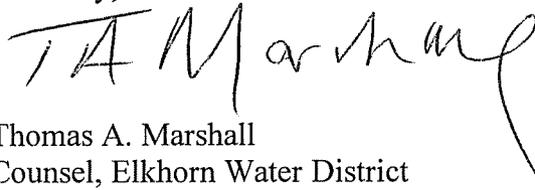
Re: Motion for Intervention
Elkhorn Water District
Case No. 2006-00444

Dear Ms. O'Donnell:

Please accept for filing the attached Motion for Intervention as tendered by Elkhorn Water District through counsel. The original and ten copies are provided for filing and review by the Commission and Staff.

Your assistance is very much appreciated.

Sincerely,



Thomas A. Marshall
Counsel, Elkhorn Water District

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. 2006-00444
ELECTRIC & WATER PLANT BOARD)**

Motion for Full Intervention by Elkhorn Water District

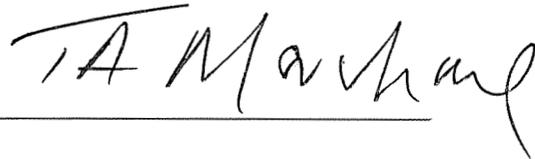
Comes the Elkhorn Water District (“Elkhorn”), by counsel, and hereby tenders this motion requesting that it be granted full intervention in Case No. 2006-0444, and in any other matter currently before the Commission, however styled or numbered, regarding rate changes or charges that will affect Elkhorn and its customers. Specifically, Elkhorn has been advised that on September 20, 2006, the Frankfort Electric & Water Plant Board (also, referred to as the Frankfort Plant Board) filed a tariff or notice with the Commission indicating and setting forth an increase in the wholesale rate(s) for Elkhorn and other regulated wholesale customers. It was indicated that the increase is to be effective November 1, 2006.

The Elkhorn Water District, P.O. Box 67, Frankfort, KY 40602, is subject to regulation by the Kentucky Public Service Commission. Elkhorn hereby asks that the Commission investigate the rates as proposed by the Frankfort Plant Board so as to determine whether the rates are fair, just and reasonable. Elkhorn asks that the Commission carefully review any cost of service study or other justification that is provided in support of the rates in order to determine whether adequate information has been provided to support the proposed rates. Further, Elkhorn asks that the Commission

consider any other issue or matter related to the wholesale rates that would assist in determining the reasonableness of the rates as proposed. Elkhorn believes that its participation in these proceedings would not be burdensome upon the Commission or the proceedings, and that such participation will assist in the Commission's review.

If the proposed rates have not been suspended by the Commission, it is requested that the Commission suspend the rate adjustments or increases as proposed by the Frankfort Plant Board and scheduled to be effective on November 1, 2006, while the Commission conducts its review, and until a final determination is made as to the rates to be approved.

Respectfully submitted,

A handwritten signature in black ink that reads "T A Marshall". The signature is written in a cursive style and is positioned above a horizontal line.

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Counsel for Elkhorn Water District

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION has be sent by first-class mail, postage prepaid, on this date, October, 19, 2006, to the following:

Hance Price, Esq.
Counsel, Frankfort Plant Board
317 W. Second Street
P.O. Box 308
Frankfort, KY 40602

Donald T. Prather, Esq.
500 Main Street, Suite 5
Shelbyville, KY 40065
Counsel, N. Shelby Water Co.
and U.S. 60 Water District


Thomas A. Marshall