

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY-)
AMERICAN WATER COMPANY) CASE NO.
FOR AN ADJUSTMENT OF RATES) 2012-00520

MOTION FOR FULL INTERVENTION

* * * * *

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 3(8) moves that it be granted leave to intervene in this matter and that it be granted full intervention.

In this matter the Commission will examine the request of Kentucky-American Water Company for an adjustment in rates. Approval of this application would have a significant impact on CAC's low income clients.

CAC, whose address is P.O. Box 11610, Lexington, KY 40576, is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents in Kentucky-American Water Company's service territory. As such, CAC has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. CAC has participated as a party in numerous rate cases as an advocate for low-income utility customers, including Kentucky American Water Company's 2010 rate case. CAC's interests are not adequately represented by the other parties to this proceeding. CAC will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

CAC expects to present the testimony of Jack E. Burch, Executive Director of CAC, and may choose to present testimony of other witnesses not yet identified.

WHEREFORE, CAC requests that it be granted leave for full intervention and that it be certified as a full party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross-examine witnesses, and be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties or orders of the Commission.

Respectfully submitted,



IRIS G. SKIDMORE
Bates and Skidmore
415 W. Main St., Suite 2
Frankfort, KY 40601
Telephone: (502)-352-2930
Facsimile: (502)-352-2931
BatesAndSkidmore@gmail.com

COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that CAC's January 2, 2013 electronic filing is a true and accurate copy of the Motion for Full Intervention to be filed in paper medium; that the electronic filing has been transmitted to the Commission on January 2, 2013; that an original and one copy of the filing will be delivered to the Commission on January 2, 2013; and that, on January 2, 2013, electronic mail notification of the electronic filing is provided to the Commission and the following:

Lindsey W. Ingram, III, Esq.
Monica Braun, Esq.
STOLL KEENON OGDEN PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
L.Ingram@skofirm.com

David Edward Spenard, Esq.
Office of the Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601
David.Spenard@ag.ky.gov

David J. Barberie, Esq.
Janet M. Graham, Esq.
Department of Law
200 East Main Street
Lexington, KY 40507
dbarberi@lexingtonky.gov

A handwritten signature in blue ink, appearing to read "David J. Barberie".

Counsel for CAC