

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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**PUBLIC SERVICE
COMMISSION**

IN THE MATTER OF:

APPLICATION OF HARDIN COUNTY WATER)
DISTRICT #1 TO MODIFY)
WATER UTILITY TARIFF)
OF MASTER METERS FOR BILLING)
MULTI-UNIT RESIDENTIAL PROPERTIES)

CASE NO. 2009-00113

MOTION FOR FULL INTERVENTION

Homestead Manufactured Home Community, Yarwood Mobile Home Park, LLC,
Country Lane Mobile Home Park, Duvall Mobile Home Park, Masden’s Mobile Home Park,
LLC, Lynch’s Mobile Home Park, Golden Rainbow Mobile Home Park, Inc., Parkside Manor
MHP Radcliff, LLC, Rogersville Mobile Home Park and Paradise Mobile Home Park, Inc.
(hereinafter “Mobile Home Parks”), by counsel, hereby move the Public Service Commission of
the Commonwealth of Kentucky (“the Commission”), to grant them full intervention in the
above-captioned matter, pursuant to 807 KAR 5:001, Section 8(3). The Mobile Home Parks
request intervention as a party to the fullest extent permitted by law.

In support of this Motion, the above mentioned Mobile Home Parks own mobile home
park communities that are served by Hardin County Water District #1 (“Hardin County Water”)
and these mobile home park communities will be substantially impacted by the Commission’s
decision on the Application filed by Hardin County Water to modify its water utility tariff
providing for master meters for billing multi-unit residential properties, which would include
mobile home parks. The Mobile Home Park will be significantly affected by this tariff
modification, if approved, because it will be cost prohibitive to comply with the proposed tariff’s
provisions, will result in substantial increases in customer/resident rental rates, and could result
in substantial loss of water. Any ruling by the Commission in this case would therefore have a

direct impact on the mobile home communities, the mobile home parks themselves (the proposed intervenors) and their customers/residents. As such, the Mobile Home Parks have a special interest in the case not otherwise adequately represented by any other party.

It is appropriate therefore that the Mobile Home Parks be made parties to the case and the undersigned counsel should be served with all testimony, pleadings, correspondence and all other documents submitted by parties, and to participate in the hearing in this matter.

For the foregoing reasons, the Mobile Home Parks respectfully request the Kentucky Public Service Commission to grant this Motion for Full Intervention.

Respectfully Submitted,

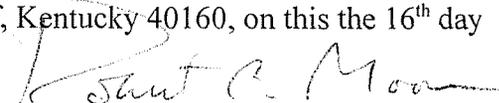


Robert C. Moore
Hazelrigg & Cox, LLP
415 West Main Street, 1st Floor
P.O. Box 676
Frankfort, Kentucky 40602-0676

Counsel for Homestead
Manufactured Home Community,
Yarwood Mobile Home Park, LLC,
Country Lane Mobile Home Park,
Duvall Mobile Home Park,
Masden's Mobile Home Park, LLC,
Lynch's Mobile Home Park, Golden
Rainbow Mobile Home Park, Inc.,
Rogersville Mobile Home Park,
Parkside Manor MHP Radcliff, LLC,
and Paradise Mobile Home Park, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on David T. Wilson II, Skeeters, Bennett, Wilson & Pike, 550 W. Lincoln Trail, Blvd., P. O. Box 610, Radcliff, Kentucky 40160, Brett Pyles, Operations Manager, Hardin County Water District #1, 1400 Rogersville Road, Radcliff, Kentucky 40160, on this the 16th day of April, 2009.



Robert C. Moore