

Mayor
Edwinna Baker



City Clerk/ Administrator
Robbie Hume

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502-839-5372

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August 31, 2009

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

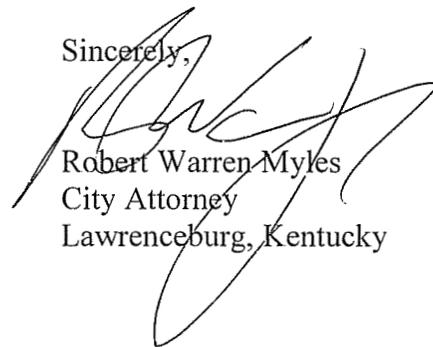
RE: Case No. 2009-00124

Dear Mr. Derouen,

Please find enclosed the Motion for Intervention tendered in the above referenced matter by the City of Lawrenceburg.

Thank you for your attention to this matter. Please feel free to contact me should you have any questions. I can be reached at 502-839-5372 as well as by e-mail at rwm316@gmail.com.

Sincerely,



Robert Warren Myles
City Attorney
Lawrenceburg, Kentucky

RECEIVED

AUG 31 2009

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 31 2009

PUBLIC SERVICE
COMMISSION

In the Matter of :

TARIFF FILING OF KENTUCKY-AMERICAN)
WATER COMPANY TO REVISE THE) Case No.
KENTUCKY RIVER AUTHORITY) 2009-00124
WITHDRAWAL FEE)

MOTION TO INTERVENE
BY THE
CITY OF LAWRENCEBURG

Comes now the Movant, the City of Lawrenceburg, by and through Counsel, pursuant to the Order of the Public Service Commission entered in this matter on August 18, 2009 and all other applicable statutes and regulations, and moves to intervene in the said above-styled proceeding and to be grant full intervenor status herein.

In support of this Motion, the City of Lawrenceburg states as follows:

1. That in an Order dated August 19, 2009, the Public Service Commission stated and found as follows:

...we find that all water utilities, public and municipal, that are subject to the Commission jurisdiction and that are assessed a withdrawal fee by the KRS should be given notice of this proceeding and an opportunity to intervene and to submit written memoranda on the issue.

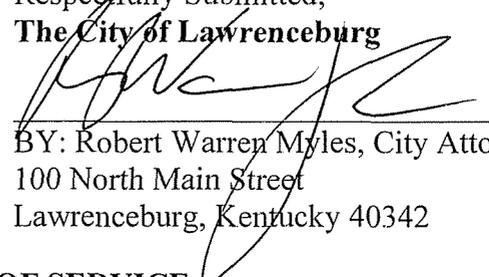
2. That the City of Lawrenceburg, 100 North Main Street, Lawrenceburg, Kentucky 40342, is a municipal subdivision of the Commonwealth of Kentucky, and in such capacity operates the Lawrenceburg Water Company.

3. That as a continuing and substantial portion of its operations, the City of Lawrenceburg actively withdraws water from the Kentucky River Basin and pays Tier I and Tier II user fees assessed by the Kentucky River Authority.

4. That a decision in the matter before the Commission styled as Case No.2009-00124 will have a direct impact on the Movant's customers, the ability of the Movant to provide services to its current and future water customers and may well dramatically effect the relationship between the Movant and the current water company bond holders.

WHEREFORE, the Movant, City of Lawrenceburg, respectfully requests that it be granted full rights and status as an intervenor herein.

Respectfully Submitted,
The City of Lawrenceburg



BY: Robert Warren Myles, City Attorney
100 North Main Street
Lawrenceburg, Kentucky 40342

CERTIFICATE OF SERVICE

This is to certify that an original and ten (10) photocopies of this Motion to Intervene were served, filed and hand delivered to Mr. Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Blvd. Frankfort, Kentucky 40601 and that a true and accurate copy of this Motion was mailed, first class postage prepaid, to the following:

Hon. Lindsey W. Ingram, III
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801

Hon. David E. Spenard
Utility and Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204

Hon. Hance Price
Attorney for the Frankfort Plant Board
317 West Second Street
Frankfort, Kentucky 40601

all on this the 31st day of August, 2009.



Robert Warren Myles
City Attorney
City of Lawrenceburg