

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2005-00235

In the Matter of:

APPLICATION OF MALLARD POINT
DISPOSAL SYSTEMS, INC. FOR AN
ADJUSTMENT OF RATES PURSUANT TO THE
ALTERNATIVE RATE FILING PROCEDURE
FOR SMALL UTILITIES

RECEIVED

JUL 25 2005

PUBLIC SERVICE
COMMISSION

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**OBJECTION TO MOTIONS FOR FULL INTERVENTION BY LESLEY
FLOCCARE, DAVID & LORIE WISE, GREGORY & KAREN BROWN,
BRAIN & LESLIE STUMBO, JAMES & CAROL PRICE, STEVE &
TABATHA MCELDRED, ROBERT A. PATRICK, JIM & REBECCA
NELSON, CHARLES F. KNAPP, JEFFERY R. HURST, JOHN &
SHARLYN GOLDING, ERIC FREEMAN, JAMES & JOAN DELMORO,
JERRY BRATFISH, DAVID G. ABSHER, CATHERINE A. WHITE,
MARVIN BAKER, AND DON MCNAMEE**

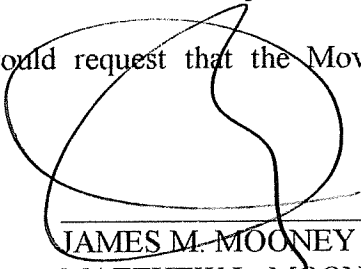
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Comes the Applicant Mallard Point Disposal Systems, Inc. (Mallard Point), and objects to the Motions to Intervene filed herein by Lesley Floccare, David & Lorie Wise, Gregory & Karen Brown, Brain & Leslie Stumbo, James & Carol Price, Steve & Tabatha McEldred, Robert A. Patrick, Jim & Rebecca Nelson, Charles F. Knapp, Jeffery R. Hurst, John & Sharlyn Golding, Eric Freeman, James & Joan Delmoro, Jerry Bratfish, David G. Absher, Catherine A. White, Marvin Baker, and Don McNamee (Movants) upon the following grounds:

In Mallard Point's last rate case, several Mallard Point customers were granted full intervention and, consequently, several submitted duplicative data requests to Mallard Point during that proceeding, causing unnecessary burden and expense upon Mallard Point. In order to ensure that Mallard Point is not subjected to unnecessarily duplicative data requests again in this proceeding, Mallard Point respectfully requests that the Commission consider joining the Movants together as a single entity in order that they might submit a single, composite request.

It is worth noting that the motions filed by Jeffery R. Hurst, Brain & Leslie Stumbo, James & Carol Price, David & Lorie Wise, Steve & Tabatha McEldred, Gregory & Karen Brown, Lesley Floccare, Marvin Baker, and Don McNamee are made on identical, pre-printed forms. Moreover, the motions filed by David G. Absher, Jerry Bratfish, Eric Freeman, John & Sharlyn Golding, Jim & Rebecca Nelson, Charles F. Knapp, and Catherine A. White, while not made on the same form, are modeled identically thereafter. Consequently, it appears these Movants, at least, are already organized and affiliated in some fashion, and joining them together as a single entity will not prejudice their involvement in this proceeding.

Alternatively, Mallard Point, would request that the Movants be granted limited, as opposed to full, intervention.



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ATTORNEYS FOR MALLARD POINT
DISPOSAL SYSTEMS, INC.

CERTIFICATE OF SERVICE

I hereby certify that the original and ten (10) copies hereof was mailed, postage prepaid, to the following:

Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

and that a copy of the foregoing was mailed, postage prepaid, to the following:

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Georgetown, Kentucky 40324

Don McNamee
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Georgetown, Kentucky 40324

on this the 22nd day of July, 2005.



JAMES M. MOONEY

ATTORNEY FOR MALLARD POINT
DISPOSAL SYSTEMS, INC.

LAW OFFICES
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