



Mayor Teresa Ann Isaac

LEXINGTON - FAYETTE URBAN COUNTY GOVERNMENT
Department of Law

January 27, 2006

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JAN 30 2006

PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: Case No. 2005-00546
(Application of Kentucky American Water)

Dear Ms. O'Donnell:

Please find enclosed herewith for filing an original and 10 copies of the Lexington-Fayette Urban County Government's Motion to Intervene in the referenced matter. Please contact me should you have any questions pertaining to the same.

Yours truly,

A handwritten signature in black ink, appearing to read "D. Barberie".

David J. Barberie
Corporate Counsel

ENC

DJB/let470

HORSE CAPITAL OF THE WORLD

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Lexington, KY 40507

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JAN 30 2006

IN THE MATTER OF:

APPLICATION OF KENTUCKY-AMERICAN WATER)
COMPANY FOR A DETERMINATION BY THE)
PUBLIC SERVICE COMMISSION OF THE)
ADEQUACY OF ITS WATER STORAGE CAPACITY) CASE NO.
ANALYSIS DATED DECEMBER 21, 2005 AND FOR A) 2005-00546
DEVIATION FROM 807 KAR 5:066, SECTION 4(4),)
UNTIL DECEMBER 31, 2020 PURSUANT TO 807)
KAR 5:066, SECTION 18)

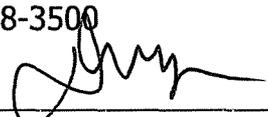
PUBLIC SERVICE
COMMISSION

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S MOTION TO INTERVENE**

COMES the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and moves for full intervenor status in this action pursuant to 807 KAR 5:001 Section 3(8) to the fullest extent permitted by law on behalf of itself and the residents of Fayette County, Kentucky, as any determination in this matter directly impacts the LFUCG and the residents of Fayette County, and as it is an intervener in other Commission cases related to this matter, including Case No. 2001-00117.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN
COUNTY GOVERNMENT
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500

BY: 

David J. Barberie
Corporate Counsel
Leslye M. Bowman
Director of Litigation

CERTIFICATE OF SERVICE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served by first class U.S. Mail delivery, postage prepaid, to Beth O'Donnell, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail delivery, postage prepaid, on the following, all on this the 27th day of January 2006:

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

Hon. David Edward Spenard
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

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ATTORNEY FOR LEXINGTON-FAYETTE
URBAN COUNTY GOVERNMENT