

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

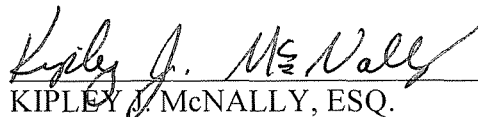
JOINT PETITION OF THE CITY OF )  
PIKEVILLE AND MOUNTAIN ) CASE NO. 2006-00123  
WATER DISTRICT FOR THE )  
TRANSFER OF CERTAIN )  
WASTEWATER FACILITIES AND )  
RELATED DEBT )

REQUEST TO TAKE THE CITY OF PRESTONSBURG'S  
MOTION TO INTERVENE UNDER SUBMISSION

City of Prestonsburg, acting by and through its Utilities Commission, the Prestonsburg City's Utilities Commission (collectively, the "Movant"), by counsel, files as a response its Request for the Commission to take under submission its Motion to Intervene to the supplemental response of the City of Pikeville (individually, "Pikeville") and Mountain Water District (collectively "Joint Petitioners") to Movant's Motion to Intervene.

By counsel, Movant requests that the Commission take its Motion to Intervene under Submission and issue an appropriate order granting Movant's Motion to Intervene, or in the alternative, re-characterize Movant's Motion to Intervene as a Complaint as requested in Movant's Reply.

Respectfully submitted,




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Special Counsel For the City of Prestonsburg and  
the Prestonsburg City's Utilities Commission

**CERTIFICATE OF SERVICE**

This is to certify that an original and ten copies of the foregoing Reply to the Response of the Joint Petitioners to the Motion of City of Prestonsburg to Intervene in the above-referenced case was mailed by first class mail, postage prepaid to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; and copies were mailed to John N. Hughes, Esq., 124 W. Todd Street, Frankfort, Kentucky 40601 and Joseph G. Jacobs, Chairman of Sandy Valley Water District, P.O. Box 127, Betsy Layne, Kentucky 41605.

  
Kipley J. McNally, Special Counsel for the  
City of Prestonsburg and the Prestonsburg  
City's Utilities Commission