

**THOMAS A. MARSHALL**  
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October 19, 2006

**RECEIVED**

**OCT 19 2006**

**PUBLIC SERVICE  
COMMISSION**

Beth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

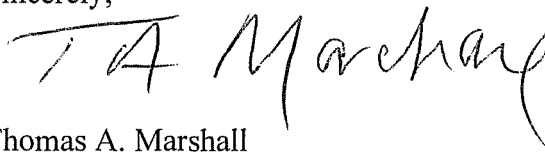
Re: Motion for Intervention  
Peaks Mill Water District  
Case No. 2006-00444

Dear Ms. O'Donnell:

Please accept for filing the attached Motion for Intervention as tendered by Peaks Mill Water District through counsel. The original and ten copies are provided for filing and review by the Commission and Staff.

Your assistance is very much appreciated.

Sincerely,



Thomas A. Marshall  
Counsel, Peaks Mill Water District

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

**In the Matter of:**

**PROPOSED ADJUSTMENT OF THE WHOLESALE )  
WATER SERVICE RATES OF THE FRANKFORT ) CASE NO. 2006-00444  
ELECTRIC & WATER PLANT BOARD )**

**Motion for Full Intervention by Peaks Mill Water District**

Comes the Peaks Mill Water District (“Peaks Mill”), by counsel, and hereby tenders this motion requesting that it be granted full intervention in Case No. 2006-0444, and in any other matter currently before the Commission, however styled or numbered, regarding rate changes or charges that will affect Peaks Mill and its customers.

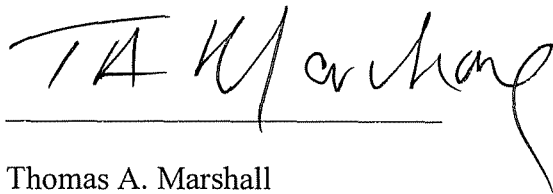
Specifically, Peaks Mill has been advised that on September 20, 2006, the Frankfort Electric & Water Plant Board (also, referred to as the Frankfort Plant Board) filed a tariff or notice with the Commission indicating and setting forth an increase in the wholesale rate(s) for Peaks Mill and other regulated wholesale customers. It was indicated that the increase is to be effective November 1, 2006.

The Peaks Mill Water District has its office at 310 Perkins Lane, Frankfort, KY 40601, and is subject to regulation by the Kentucky Public Service Commission. Peaks Mill hereby asks that the Commission investigate the rates as proposed by the Frankfort Plant Board so as to determine whether the rates are fair, just and reasonable. Peaks Mill asks that the Commission carefully review any cost of service study or other justification that is provided in support of the rates in order to determine whether adequate information has been provided to support the proposed rates. Further, Peaks Mill asks

that the Commission consider any other issue or matter related to the wholesale rates that would assist in determining the reasonableness of the rates as proposed. Peaks Mill believes that its participation in these proceedings would not be burdensome upon the Commission or the proceedings, and that such participation will assist in the Commission's review.

If the proposed rates have not been suspended by the Commission, it is requested that the Commission suspend the rate adjustments or increases as proposed by the Frankfort Plant Board and scheduled to be effective on November 1, 2006, while the Commission conducts its review, and until a final determination is made as to the rates to be approved.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T A Marshall", is written over a horizontal line. The signature is cursive and extends to the right of the line.

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Counsel for Peaks Mill Water District

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing MOTION has be sent by first-class mail, postage prepaid, on this date, October, 19, 2006, to the following:

Hance Price, Esq.  
Counsel, Frankfort Plant Board  
317 W. Second Street  
P.O. Box 308  
Frankfort, KY 40602

Donald T. Prather, Esq.  
500 Main Street, Suite 5  
Shelbyville, KY 40065  
Counsel, N. Shelby Water Co.  
and U.S. 60 Water District

A handwritten signature in black ink, appearing to read "TA Marshall", written in a cursive style.

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Thomas A. Marshall