

THOMAS A. MARSHALL
ATTORNEY AT LAW

P.O. Box 223
Frankfort, Kentucky 40602

2008-00250

212 Washington Street
Telephone: (502) 223-4723
~~marshall@msl.com~~

July 3, 2008

RECEIVED

JUL 03 2008

**PUBLIC SERVICE
COMMISSION**

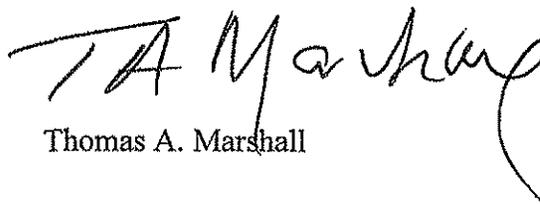
Ms. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Motions for Intervention by Elkhorn and Peaks Mill Water Districts
Frankfort Plant Board's Wholesale Water Adjustment

Dear Ms. Stumbo:

Elkhorn and Peaks Mill Water Districts hereby file and present their Motions for Intervention in the matter of the wholesale water adjustment as filed by the Frankfort Electric and Water Plant Board on or about June 6, 2008. If there are any questions, please contact me at 223-4723 or tamarshall@mac.com.

Sincerely,


Thomas A. Marshall

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JUL 03 2008
PUBLIC SERVICE
COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)
WATER SERVICE RATES OF THE FRANKFORT) CASE NO. 2008-00250
ELECTRIC AND WATER PLANT BOARD)

Motion for Full Intervention by Elkhorn Water District

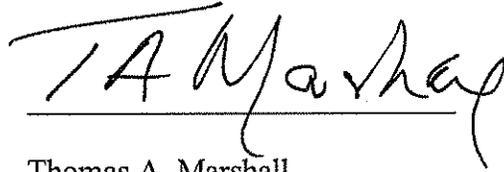
Comes the Elkhorn Water District ("Elkhorn"), by counsel, and hereby tenders this motion requesting that Elkhorn be granted full intervention in regards to the Frankfort Electric and Water Plant Board's ("Frankfort Plant Board") request for a rate increase, approximately 18.39 percent, as evidenced by a proposed tariff filed on or about June 6, 2008, and to be effective on July 7, 2008.

For its grounds for intervention, Elkhorn states that it is located in Franklin County, Kentucky, and is subject to regulation by the Kentucky Public Service Commission. Elkhorn is a wholesale customer of the Frankfort Plant Board, and believes that it is in the best interest of Elkhorn's customers that the Commission review and investigate the proposed increase(s) in regards to reasonableness and the adequacy of the justification.

Elkhorn requests that the Commission carefully review any cost of service study or other justification that is provided in support of the rates, and that the Commission consider any other issue or matter related to the wholesale rates that would assist in

determining their reasonableness. In conclusion, it is requested that the rates proposed by the Frankfort Plant Board be suspended during Commission review.

Respectfully submitted,



Thomas A. Marshall
P.O. Box 223
212 Washington Street
Frankfort, KY 40602
Ph: (502) 223-4723
Fax: (502) 223-0001
tamarshall@mac.com

Counsel for Elkhorn Water District

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION has been sent by first-class mail, postage prepaid, on this date, July 3, 2008, to the following:

Warner J. Caines
General Manager
Frankfort Plant Board
317 W. Second Street
P.O. Box 308
Frankfort, KY 40602

Donald T. Prather
500 Main Street, Suite 5
Shelbyville, KY 40065
Attorney for North Shelby
Water Company and U.S. 60
Water District

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

