

BLANKENSHIP LAW OFFICE, PLLC

November 10, 2008

Stephanie Stumbo
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

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NOV 13 2008

PUBLIC SERVICE
COMMISSION

Re: Case No. 2008-00443
Magoffin County Water District

Dear Ms. Stumbo:

Enclosed are the original and ten (10) copies of the Motion for Intervention, which is being filed on behalf of the Paintsville Utilities Commission.

I trust this is satisfactory. However, should you have any questions or concerns, please feel free to contact me at your convenience.

Very Truly Yours,



A. David Blankenship

**328 E. COURT STREET
PRESTONSBURG, KENTUCKY 41653
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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2008-00443

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NOV 13 2008

PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE
ADEQUACY OF THE WATER SUPPLY
OF MAGOFFIN COUNTY WATER
DISTRICT

PAINTSVILLE UTILITIES COMMISSION'S MOTION FOR INTERVENTION

COMES the Paintsville Utilities Commission (the "PUC"), by and through Counsel, pursuant to 807 KAR 5:001, Section 3(8), and all other applicable rules and regulations of the Commission, and moves for leave to intervene in this case.

1. PUC is a water commission created by the City of Paintsville on October 3, 1950. Under the present water supply capacity of the PUC, in addition to the residents of Johnson County, the PUC provides services to Lawrence County, Morgan County, and Floyd County.

2. The PUC is currently building a water treatment plant that could further extend its water supply services to more of the above counties and also to Martin County and Magoffin County, thus making it a truly regional water supply.

3. The new water treatment plant was designed under a regional concept with the intentions of providing safe, potable water to all counties surrounding Johnson County. The plant is designed to service four (4) million gallons of water a day and can be expanded to service up to six (6) million gallons of water a day.

4. As this case is exploring the possibilities available to the Magoffin County Water District for a safe and adequate water supply, the PUC seeks to intervene in this matter as to be considered a possible supplier of said water to the Magoffin County Water District when the new water treatment plant is completed.

5. Consequently, PUC has a special interest in this proceeding which is not otherwise adequately represented. Intervention by PUC will enable it to present issues and possibilities and to develop facts that will assist the Commission in fully considering this matter. Intervention by PUC will not unduly complicate or disrupt this proceeding.

6. PUC requests that it be permitted to intervene as a party in this proceeding so that it will be served with Commission Orders, testimony, data requests, responses to data requests, exhibits, pleadings, correspondence and all other documents filed by all parties and by the Commission.

7. The address of the PUC is as follows:

Larry Herald
Paintsville Utilities Commission
P.O. Box 630
Paintsville, Kentucky 41240

8. The undersigned is an attorney at law and represents the PUC.

WHEREFORE, the Paintsville Utilities Commission respectfully requests that it be permitted to intervene in this case.

This the 10th day of November, 2008.

Respectfully submitted,

BLANKENSHIP LAW OFFICE, PLLC

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Prestonsburg, Kentucky 41653
Attorney for Paintsville Utilities
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A. DAVID BLANKENSHIP

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing Motion for Intervention was this 10th day of November, 2008, mailed postage prepaid to the following:

Division of Water Frankfort Office Park
14 Reilly Road
Frankfort, KY 40601

Randall Hardin
Chairman
Magoffin County Water District
749 Parkway Road
P.O. Box 490
Salyersville, KY 41465

James W. Hoskins
Superintendent
Magoffin County Water District
749 Parkway Road
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Thomas Howard
Superintendent
Salyersville Water Works
401 College Street
Salyersville, KY 41465

Judy Jackson
Chairperson
Salyersville Water Works
401 College Street
Salyersville, KY 41465

Hon. David Edward Spenard
Assistant Attorney General
Office of the Attorney General Utility & Rate
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ATTORNEY