

BATES AND SKIDMORE

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AUG 31 2009

PUBLIC SERVICE
COMMISSION

Jack B. Bates

Iris G. Skidmore

August 31, 2009

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.P. Box 615
Frankfort, KY 40602-0615

Re: *Tariff Filing of Kentucky-American Water Company to Revise the Kentucky River
Authority Water Withdrawal Fee*
Case No. 2009-00124

Dear Mr. Derouen:

Submitted herewith for filing are the following documents: Original and ten (10) copies of the Motion for Full Intervention by the Kentucky Municipal Utility Association.

If you have questions, do not hesitate to contact this office.

Sincerely,



Jack B. Bates

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 31 2009

PUBLIC SERVICE
COMMISSION

In the Matter of:

TARIFF FILING OF KENTUCKY-AMERICAN)
WATER COMPANY TO REVISE THE)
KENTUCKY RIVER AUTHORITY)
WITHDRAWAL FEE)

CASE NO. 2009-00124

MOTION FOR FULL INTERVENTION

* * * * *

Comes the Kentucky Municipal Utility Association (“KMUA”), by counsel, and pursuant to 807 KAR 5:001, Section 3(8), moves that it be granted leave to intervene in this matter and that it be granted full intervention.

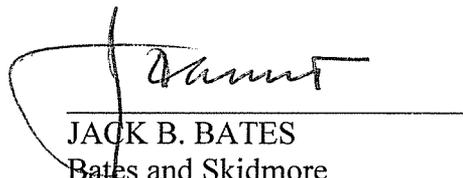
The Commission, according to its August 18, 2009 Order, will investigate the reasonableness and lawfulness of Kentucky-American Water Company’s (“KAWC”) proposed tariff revision.

KMUA is an association of fifty-nine (59) municipal utilities in Kentucky. Its address is 110-A East Todd Street, Frankfort, KY 40601, and its Executive Director is Annette DuPont-Ewing. Certain of KMUA’s membership provide water service to customers in the Kentucky River Basin, and as a consequence must pay water use fees imposed by the Kentucky River Authority. KAWC’s proposed tariff revision and its handling of the water use fees will have an impact on KMUA members. As an association KMUA has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. KMUA’s interests are not adequately represented by the other parties to this proceeding. KMUA will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by KMUA will not unduly delay these proceedings, or unduly complicate or disrupt them.

WHEREFORE, KMUA requests that:

1. Full intervention be granted and that KMUA be certified as a full party;
2. KMUA be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties, and orders of the Commission;
3. KMUA be allowed to file a written memorandum addressing the issues identified in the Commission's August 18, 2009 Order; and
4. KMUA be granted the right to present testimony and exhibits, present witnesses, cross-examine witnesses, as may be necessary or appropriate.

Respectfully submitted,



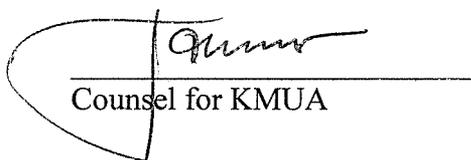
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COUNSEL FOR KMUA

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2009, a true and accurate copy of the foregoing MOTION FOR FULL INTERVENTION was served by United States mail, postage prepaid, to the following:

Lindsey W. Ingram III
Stoll Keenon & Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507-1801



Counsel for KMUA