

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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OCT 29 2010

PUBLIC SERVICE
COMMISSION

In The Matter Of:

APPLICATION OF NORTHERN KENTUCKY WATER) CASE NO. 2010-00094
DISTRICT FOR APPROVAL OF AN INCREASE IN)
GENERAL RATES)

MOTION FOR FULL INTERVENTION
BY ASSOCIATION OF COMMUNITY MINISTRIES

Pursuant to K.R.S. 278.310 and 807 KAR 5:001, Section 3(8), THE NORTHERN KENTUCKY TEA PARTY ("NKYTP"), by counsel, files this Motion for Full Intervention in the above-styled proceeding. NKYTP's address is P.O. Box 853, Independence, Kentucky 41051.

NKYTP is a Kentucky nonprofit corporation and its membership is comprised of 4 independent county based community groups that provide education, training and public and social services concerning issues of public interest in the Northern Kentucky area. The common mission for all 4 membership groups is to provide a format and organization to network in partnership with the various Northern Kentucky Government entities, local citizens, businesses and organizations. Each community group serves a specific geographical area to ensure that all of Northern Kentucky is covered under the umbrella of the NKYTP. An example of the social services provided by the NKYTP members is tax and legislative training and guidance to local and state government entities. NKYTP members provide both financial assistance and advocacy

to citizens that are engaging government entities on regulatory or decisions relating to the setting of rates for public utilities or taxing entities such as the Northern Kentucky Water District.

NKYTP has an interest in this proceeding as an advocate for all customers in the Northern Kentucky Water Service District, especially those who because of their inability to commit the time required to attend public meetings and devote the time required to read the technical documents involved in this case. Through its participation in this case, NKYTP will assist the Commission in evaluating how the proposed rate increase as a result of unfunded mandates will impact water customers in the Northern Kentucky Water Service district and other Kentuckians.

NKYTP is a new organization formed in 2010 and has had a positive impact representing its members in other public hearings. NKYTP wishes to continue these positive impacts by participating in this hearing before the Public Service Commission for the application of Northern Kentucky Water District for approval of an increase in general rates, Case No. 2010-00094.

NKYTP represents an interest that is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

The attorneys for NKYTP authorized to represent it in this proceeding and to take service of all documents are:

Duane Skavdahl, Esq.
300 Buttermilk Pike, Suite 324
Ft. Mitchell, Kentucky
Phone: (859) 547-1200
Email: dskavdahl@smithrolfes.com
Fax: (502) 547-1219

WHEREFORE, NKYTP requests that it be granted full intervention as a party to this proceeding.

Respectfully submitted,



Hon. Duane R. Skavdahl (88132)
300 Buttermilk Pike, Suite 324
Ft. Mitchell, Kentucky 41017
Phone: (859) 547-1200

Attorney for NKYTP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Full Intervention by Northern Kentucky Tea Party was served this 21st day of October, 2010, via ordinary U.S. Mail, postage prepaid to the following:

Jack Conway, Attorney General
Office of the Attorney General
Capitol Suite 118
700 Capitol Avenue
Frankfort, Kentucky 40601-3449

David Spenard, Assistant Attorney General
Office of the Attorney General
Capitol Suite 118
700 Capitol Avenue
Frankfort, Kentucky 40601-3449



Hon. Duane R. Skavdahl

Hon. Duane R. Skavdahl
300 Buttermilk Pike, Suite 324
Ft. Mitchell, Kentucky 41017

October 21, 2010

VIA FACSIMILE AND ORDINARY MAIL

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40601

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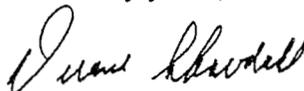
RE: Application Of Northern Kentucky Water District
For Approval Of An Increase In General Rates
Public Service Commission, Case No.: 2010-00094

Dear Mr. Derouen:

Enclosed please find the original and twelve (12) copies of the Motion for Full Intervention by Association of Community Ministries which we have prepared for filing in the above referenced matter. Should you have questions, or need further information, please do not hesitate to contact me.

Thank you in advance for your assistance with this matter.

Sincerely yours,



Duane R. Skavdahl

DRS:es

Enclosure: *(Motion for Full Intervention)*