

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAY 19 2004

In the Matter of:

PUBLIC SERVICE
COMMISSION

AN ADJUSTMENT OF THE)
RATES OF KENTUCKY-)
AMERICAN WATER COMPANY) CASE NO. 2004-00103
KENTUCKY UTILITIES COMPANY)
)

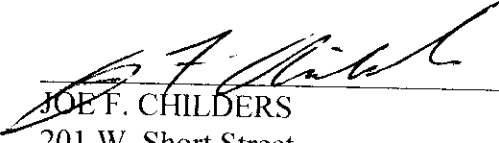
MOTION FOR FULL INTERVENTION

Come now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), P.O. Box 11610, Lexington, KY 40576, by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby move for leave to intervene as a full party in the above-referenced proceeding. In support of this motion, CAC states as follows:

1. CAC is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents of Kentucky-American Water Company's service territory. As such, it is likely to present issues and provide a perspective which is not likely to be presented by the other parties to this proceeding, and its interests are not adequately represented by other parties to this proceeding. CAC's participation will not unduly delay these proceedings.
3. In this proceeding, the Commission will examine the request by Kentucky-American Water Company for an adjustment to its rates, which if approved as requested could have a significant impact on the low-income clients served by

CAC.

4. CAC expects to present testimony from Jack E. Burch, Executive Director
Additionally, CAC may choose to present testimony from other witnesses not yet identified.
5. The intervention of CAC into this action is likely to present issues and facts that will not be adequately addressed or represented by any other party and will be helpful to the Commission in fully considering the matters without unduly complicating or disrupting this proceeding.
6. CAC respectfully requests that it be granted leave for full intervention and to participate fully as a party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine



JOE F. CHILDERS
201 W. Short Street
Suite 310
Lexington, KY. 40507
(859) 253-9824

**ATTORNEY FOR COMMUNITY
ACTION COUNCIL FOR
LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS
COUNTIES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the following persons:

Coleman D. Bush
Director Business Development
Kentucky-American Water Co.

2300 Richmond Road
Lexington, KY 40502

Roy L. Ferrell
W.Va.-American Water Co.
1600 Pennsylvania Avenue
Charleston, WV 25302

Lindsey W. Ingram, III, Esq.
Stoll, Keenon & Park
300 W. Vine Street
Suite 2100
Lexington, KY 40507

Lindsey W. Ingram, Jr., Esq.
Stoll, Keenon & Park
300 W. Vine Street
Suite 2100
Lexington, KY 40507

Michael A. Miller
W.Va.-American Water Co.
1600 Pennsylvania Avenue
Charleston, WV 25302

Roy W. Mundy, II
Kentucky-American Water Co.
2300 Richmond Road
Lexington, KY 40502

David Spenard, Esq.
Assistant Attorney General
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

David J. Barberie, Esq.
Lexington-Fayette Urban Co. Government
Department of Law
200 East Main Street
Lexington, KY 40507

on this the 18th day of May, 2004.



JOE F. CHILDERS