

February 21, 2005

Hon. Elizabeth O'Donnell  
Executive Director  
Public Service Commission of Kentucky  
211 Sower Boulevard  
Frankfort, KY 40601

RECEIVED  
FEB 23 2005  
PUBLIC SERVICE  
COMMISSION

Re: Case No. 2004-00442

Dear Ms. O'Donnell:

Enclosed please find for filing the original and ten (10) copies of the Kentucky Cable Telecommunications Association's Motion to Intervene in the above referenced case. In addition, I have enclosed an additional copy of the first page which we request be file-stamped and returned in the envelope provided.

Thank you for your attention to this matter.

Very truly yours,

WYATT, TARRANT & COMBS, LLP

  
Frank F. Chuppe

FFC/pw  
Enclosures  
20230717.1

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED  
FEB 23 2005  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF CLARK ENERGY )  
COOPERATIVE, INC. OF WINCHESTER, )  
KENTUCKY, FOR COMMISSION )  
AUTHORIZATION TO ADJUST CATV ) CASE NO. 2004-00442  
POLE ATTACHMENT RATES )

**KENTUCKY CABLE TELECOMMUNICATIONS  
ASSOCIATION'S MOTION FOR FULL INTERVENTION**

Pursuant to 807 KAR 5:001, § 3 and 5:001, § 10, the Kentucky Cable Telecommunications Association ("KCTA") moves to intervene in the above-referenced proceeding. KCTA is a non-profit organization consisting of more than 100 cable systems serving the majority of cable television customers throughout Kentucky. One of its members, Adelpia Communications, is a utility customer of Clark Energy Cooperative, Inc. and is directly affected by Clark Energy's Application to increase its pole attachment rates.

KCTA's intervention is in lieu of the individual intervention of the Clark Energy customer named herein. Consequently, KCTA's invention will promote the efficient progress of this proceeding. Further, KCTA seeks full intervention pursuant to 807 KAR 5:001, § 3(a) to allow it to fully participate as a party and to be served with documents related to Clark Energy's Application.

KCTA has previously been allowed to intervene on behalf of its members in the Application of an electric utility to increase its pole attachment rates. (See e.g., Public Service Commission Case No. 2004-00319, Application of Jackson Purchase Energy Corporation for adjustments in existing cable television rates). KCTA pledges to adhere to all Commission rules and procedures applicable to it as a party intervenor in the proceeding.

WHEREFORE, KCTA moves the Commission for full intervention in the above referenced proceeding.


Respectfully submitted,

Gardner F. Gillespie  
HOGAN & HARSTON, L.L.P.  
555 Thirteenth Street  
Washington, DC 20004-1109

  
\_\_\_\_\_  
Frank F. Chuppe  
WYATT, TARRANT & COMBS, LLP  
500 West Jefferson Street, Suite 2600  
Louisville, KY 40202  
(502) 562-7336

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon Overt L. Carroll, President & CEO, Clark Energy Cooperative, 2640 Ironworks Road, P.O. Box 748, Winchester, KY 40392 and to the Attorney General of Kentucky, Office of Rate Intervention, 1024 Capitol Center Drive, Frankfort, KY 40601 by U.S. Mail, first class postage prepaid, this 22<sup>nd</sup> day of February, 2005.

  
\_\_\_\_\_  
Frank F. Chuppe