## **BOEHM, KURTZ & LOWRY**

ATTORNEYS AT LAW 36 EAST SEVENTH STREET SUITE 1510 CINCINNATI, OHIO 45202 TELEPHONE (513) 421-2255

TELECOPIER (513) 421-2764

RECEIVED

MAY 0 4 2007

PUBLIC SERVICE COMMISSION

**VIA OVERNIGHT MAIL** 

May 3, 2007

Beth A. O'Donnell, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re:

Case No. 2007-00143

Dear Ms. O'Donnell:

Please find enclosed the original and twelve copies each of the Petition to Intervene of the Kentucky Industrial Utility Customers, Inc. in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document of file.

Very Truly Yours,

David F. Boehm, Esq.

**BOEHM, KURTZ & LOWRY** 

MLKkew Attachment

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 3<sup>rd</sup> day of May, 2007.

Honorable A.W. Turner, Jr. Kentucky-American Water Company aka Kentucky 2300 Richmond Road Lexington, KY 40502

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

Honorable David Edward Spenard Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

David F. Boehm

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

:

:

RECEIVED

MAY 0 4 2007

In the matter of: Notice Of Adjustment Of The Rates Of Kentucky-American Water Company Effective On And After May 30, 2007

Case No. 2007-0014 UBLIC SERVICE COMMISSION

## PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Kentucky Industrial Utility Customers, Inc. ("KIUC") requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

- 1. KIUC is an association of the largest industrials on the Kentucky-American Water system. Most of the water use of these industrials is for process use in manufacturing their products. The subject of the within investigation concerns the cost and reliability of intervenor's long-term supply of water, which is of the gravest concern. No other intervenor can represent the interests of this unique class of customers.
- 2. The members of KIUC who will participate herein are: Toyota Motor Manufacturing Company, Square D. Company and Lexmark International. KIUC will supplement its Petition with the names of additional participating members as this information becomes known.
- 3. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

David F. Boehm, Esq.
Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: (513) 421-2255 Fax: 513-421-2764
dboehm@BKLlawfirm.com
mkurtz@BKLlawfirm.com

WHEREFORE, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

David F. Boehm, Esq.

**BOEHM, KURTZ & LOWRY** 

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

dboehm@BKLlawfirm.com

COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

May 3, 2007