

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY-AMERICAN WATER )  
COMPANY'S NOTICE OF INTENT )  
TO FILE RATE APPLICATION ) CASE NO. 2008-00427  
SUPPORTED BY FULLY FORECASTED )  
TEST YEAR )

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**MOTION FOR FULL INTERVENTION**

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Pursuant to KAR 5:001 Section 3(8), Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. ("CAC"), P.O. Box 11610, Lexington, KY 40576, hereby moves for leave to intervene as a full party in the above-referenced proceeding. In support of its Motion, CAC respectfully states as follows:

1. CAC is a non-profit, 501(c)(3), community action agency that provides social services to numerous low-income residents of Kentucky-American Water Company's service territory, including energy assistance and related services. Accordingly, CAC will provide a perspective and submit issues that are not likely to be presented by the other parties to this proceeding. The other parties to this matter do not adequately represent CAC's interests, and its participation will not unduly delay these proceedings.
2. By intervening in this action, CAC will present facts and concerns that will not be adequately addressed or represented by any other party. CAC's full intervention will be helpful to the Commission in fully considering the parties' respective arguments, and will not unduly complicate or disrupt this proceeding.
3. CAC expects to present testimony from Jack E. Burch, Executive Director. CAC may also choose to present testimony from other witnesses not yet identified.

4. CAC therefore respectfully requests that it be granted full intervener status in this proceeding, including the right to present exhibits and testimony; cross-examine witnesses; submit arguments; and file briefs as allowed by the Commission.

Respectfully submitted,

/s/ Joe F. Childers

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

**CERTIFICATE OF SERVICE**

I hereby certify that an original and one (1) copy of the foregoing document was sent by first class mail, postage prepaid, to Stephanie L. Stumbo, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602; and that a copy was served by first class mail, postage prepaid, and by e-mail, on the following on this the 11<sup>th</sup> day of November, 2008:

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/s/ Joe F. Childers  
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