

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ADJUSTMENT OF RATES OF KENTUCKY- ) CASE NO.  
AMERICAN WATER COMPANY ) 2010-00036

**MOTION FOR FULL INTERVENTION**

\* \* \* \* \*

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 3(8) moves that it be granted leave to intervene in this matter and that it be granted full intervention.

In this matter the Commission will examine the request of Kentucky-American Water Company for an adjustment in rates. Approval of this application would have a significant impact on CAC's low income clients.

CAC, whose address is P.O. Box 11610, Lexington, KY 40576, 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 in Kentucky-American Water Company's service territory. As such, CAC has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. CAC's interests are not adequately represented by the other parties to this proceeding. CAC will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

CAC expects to present the testimony of Jack E. Burch, Executive Director of CAC, and may choose to present testimony of other witnesses not yet identified.

WHEREFORE, CAC requests that it be granted leave for full intervention and that it be certified as a full party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross-examine witnesses, and be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties or orders of the Commission.

Respectfully submitted,

/s/ Iris G. Skidmore  
IRIS G. SKIDMORE  
Bates and Skidmore  
415 W. Main St., Suite 2  
Frankfort, KY 40601  
Telephone: (502)-352-2930  
Facsimile: (502)-352-2931  
[BatesAndSkidmore@gmail.com](mailto:BatesAndSkidmore@gmail.com)

COUNSEL FOR CAC

### **CERTIFICATE OF SERVICE**

I hereby certify that CAC's February 24, 2010 electronic filing is a true and accurate copy of the Motion for Full Intervention to be filed in paper medium; that the electronic filing has been transmitted to the Commission on February 24, 2010; that an original and one copy of the filing will be delivered to the Commission on February 24, 2010; and that, on February 24, 2010, electronic mail notification of the electronic filing is provided to the Commission and the following:

A.W. Turner, Jr., General Counsel  
KENTUCKY-AMERICAN WATER COMPANY  
2300 Richmond Road  
Lexington, Kentucky 40502  
[A.Turner@amwater.com](mailto:A.Turner@amwater.com)

Lindsey W. Ingram, III, Esq.  
STOLL KEENON OGDEN PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801  
[L.Ingram@skofirm.com](mailto:L.Ingram@skofirm.com)

David Edward Spenard, Esq.  
Office of the Attorney General  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601  
[David.Spenard@ag.ky.gov](mailto:David.Spenard@ag.ky.gov)

/s/ Iris G. Skidmore  
Counsel for CAC