

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

AN INVESTIGATION INTO THE INTRASTATE	)	ADMINISTRATIVE
SWITCHED ACCESS RATES OF ALL	)	CASE NO.
KENTUCKY INCUMBENT AND COMPETITIVE	)	2010-00398
LOCAL EXCHANGE CARRIERS	)	

**MOTION OF THE ELECTRIC AND WATER PLANT BOARD OF THE CITY OF  
FRANKFORT, KENTUCKY FOR FULL INTERVENTION**

The Electric and Water Plant Board of the City of Frankfort, KY ("FPB"); pursuant to 807 KAR 5:001, Section 3(8), by counsel, moves that the Public Service Commission ("Commission" or "PSC") permit FPB to intervene fully in the above-styled proceeding. In support of its Motion, FPB states as follows:

1. The full name and address of FPB is The Electric and Water Plant Board of the City of Frankfort, KY, P.O. Box 308, 317 W. Second Street, Frankfort, KY 40602. FPB is a facilities-based competitive local exchange carrier ("CLEC") providing local exchange service to its customers in the Frankfort and Franklin County Kentucky area.
2. FPB charges its customers for switched access services pursuant to Section 3.4.4, Local Switching, of its PSC KY Tariff No. 2 titled "Access Service Tariff."
3. On November 5, 2010 the Commission issued an Order creating "an administrative case . . . to examine the switched access rates of Kentucky incumbent and competitive carriers." (Order 1.) The Commission also noted it will examine "whether it should develop a regulatory scheme that firmly establishes a methodology for charging intrastate switched access rates." Id.

4. FPB respectfully requests that Commission orders, filings or other documents submitted by parties be served electronically or at the following address:

Hance Price  
Staff Attorney  
Frankfort Plant Board  
317 W. 2<sup>nd</sup> Street  
Frankfort, KY 40601  
(502) 352-4381  
[hprice@fewpb.com](mailto:hprice@fewpb.com)

5. The Commission's determinations in this proceeding may have a direct and material effect upon FPB's legal rights, duties, privileges, immunities or other legal interests. FPB has a substantial and special interest in a Commission determination with respect to the issues raised that is not otherwise adequately represented. FPB's participation in this proceeding is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the case.

6. FPB moves that it be granted full intervention in this matter with the right to fully participate in this proceeding as a party and that counsel for FPB be served with filed testimony, exhibits, pleadings, correspondence and all other documents submitted by parties and be certified as a party for the purposes of receiving service of any petition for rehearing for judicial review.

WHEREFORE, for the foregoing reasons, FPB respectfully requests that the Commission grant its Motion for Full Intervention.

Submitted this 29<sup>th</sup> day of November, 2010.

*Hance Price*

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Certification

I hereby certify that the electronic version of this filing made with Commission on November 29<sup>th</sup>, 2010, is a true and accurate copy of the document filed herewith in paper form, and the electronic version of the filing has been transmitted to the Commission.

*Hance Price*

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Hance Price