

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY-)
AMERICAN WATER COMPANY) CASE NO.
FOR AN ADJUSTMENT OF RATES) 2015-00348

MOTION FOR FULL INTERVENTION

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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 4(11) 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. Any increase in water bills that may result from this application for a rate increase will adversely impact the low-income population served by CAC.

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. CAC regularly partners with utilities in programs to assist low income customers.

CAC has participated as a party in numerous rate cases as an advocate for low-income utility customers, including Kentucky-American Water Company's most recent rate case. In these cases, CAC has advocated for lower rates and programs that provide assistance for low-income customers.

Because CAC is the primary advocate for low income customers in Kentucky- American Water Company's service area, it 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. As the primary advocate

for low income customers, CAC will present issues and develop facts that will be helpful to the Commission in fully hearing this matter. Participation in this matter by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

CAC expects to present the testimony of Malcolm J. Ratchford, 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,



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COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that CAC's November 16, 2015 electronic filing is a true and accurate copy of the Motion for Full Intervention and cover letter to be filed in paper medium; that the electronic filing has been transmitted to the Commission on November 16, 2015; that an original and one copy of the filing will be delivered to the Commission on November 16, 2015; that there are currently no parties excused from participation by electronic service; and that, on November 16, 2015, electronic mail notification of the electronic filing is provided to the Commission and the following:

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