

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Electronic Application of Water Service                    )  
Corporation of Kentucky for a General                    )            Case No. 2020-00160  
Adjustment in Existing Rates                                 )

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**WSCK RESPONSE TO HICKMAN COUNTY SCHOOL BOARD’S  
MOTION TO INTERVENE**

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Water Service Corporation of Kentucky (“WSCK”), by counsel, respectfully submits the following Response to the Hickman County School Board’s (“School Board”) Motion to Intervene and requests that the Public Service Commission deny the School Board’s motion.

On June 26, 2020, the School Board filed a Motion to Intervene with the Public Service Commission. Administrative Regulation 807 KAR 5:001, Section 4(11)(b) states that the Commission

shall grant a person leave to intervene if the commission finds that he or she has made a timely motion for intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.

Additionally, KRS 278.040(2) requires that a person seeking intervention must have an interest in the rates or service of a utility, as those are the only matters that are subject to the Commission’s jurisdiction.

Notably, the Commission has consistently stated that “[a] mere recitation of the quantity

of water consumed by the movant or a general statement regarding a potential impact of a possible modification of rates will not be deemed sufficient to establish a special interest.”<sup>1</sup>

In its motion, School Board mentions utility related expenses, but it has not specifically stated what special interest it has in the case that is not otherwise adequately represented.

The School Board has also not identified any topics that it would be likely to present issues or to develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

Because the School Board does not have a special interest in the case that is not otherwise adequately represented and because the School Board’s intervention is not likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings, the School Board’s motion should be denied.

Respectfully submitted,



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ATTORNEYS FOR WATER SERVICE CORPORATION  
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<sup>1</sup> See, e.g., Kentucky-American Water Co., Case No. 2018-00358 (Ky. PSC Dec. 5, 2018).