

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF WATER )  
SERVICE CORPORATION OF KENTUCKY FOR )  
A GENERAL ADJUSTMENT IN EXISTING RATES )  
AND A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO DEPLOY )  
ADVANCED METERING INFRASTRUCTURE )

CASE NO.  
2022-00147

**MOTION TO INTERVENE BY CITY OF CLINTON**

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), the City of Clinton, by counsel, and respectfully moves this Commission to allow the City to intervene as a full participant in the above styled Matter. In support of the City of Clinton's (hereinafter referred to as Clinton), the Movant states as follows:

1. Clinton is one of two municipalities in Kentucky served by Water Service Corporation of Kentucky. Clinton is located in Hickman County on the far western edge of the Commonwealth. The other municipality, Middlesboro, is on the far eastern edge of the Commonwealth.
2. Clinton city employees have had a close working relationship with employees of Water Services Corporation of Kentucky, (hereinafter referred to as the Company). Clinton wastewater facilities were managed by WSCKY until December 31, 2021 when the parties mutually agreed to terminate the relationship. Clinton now manages the wastewater facilities. However, the cost of wastewater to the customer is based upon the cost of water supplied by the Company. There continues to be coordination between the Company and Clinton.
3. Clinton city employees have personal knowledge of the facilities belonging to the Company located within Clinton. Information related to maintenance and upkeep,

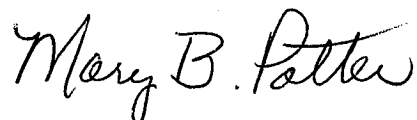
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issues upon which the Company is partially basing the most recent request for a rate increase are available with the assistance of Clinton.

4. Clinton has five hundred sixty-six (566) households and business customers of WSKY. Clinton's population has stagnated.. It has barely been two years since the last increase went into effect. An increase in water rates will exacerbate that situation.
5. Clinton's clerks and public service workers have information pertinent to this Commission's review of the improvements proposed by WSKY. As such, Clinton has information not readily available to the Attorney General or to this Commission and will therefore be of value to the Commission as this rate request is examined and decided.
6. It is expected that WSKY will not view this Motion to Intervene favorably. It is anticipated that WSKY will seek to persuade this Commission that Clinton has nothing to add as an intervenor. Clinton preemptively disputes that assertion. Clinton has been sought and been granted intervention and fully participated in WSKY rate cases in a majority of the rate increase cases the Company has brought. Clinton is will not unduly complicate or disrupt the proceedings.
7. 807 KAR 5:001, Section 4(11)(b) provides 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.
8. Clinton has a long working relationship with WSKY at levels from senior management to company workers. Clinton has information not readily available to the Attorney General or to this Commission to assist this Commission as this rate request is examined and decided.
9. Clinton has filed a timely motion to intervene in this proceeding.

WHEREFORE, the City of Clinton respectfully moves that the Clinton be allowed to intervene in this action as a party.

Respectfully submitted

A handwritten signature in black ink that reads "Mary B. Potter". The signature is written in a cursive style with a large, looped initial "M".

MARY B. POTTER  
209 N. Jefferson St.  
Clinton KY 42031  
[marybpotter@bellsouth.net](mailto:marybpotter@bellsouth.net)  
270-207-8743  
CLINTON CITY ATTORNEY

I have read the foregoing and it is true and accurate to the best of my knowledge and belief.

Mary B. Potter  
AFFIANT

STATE OF KENTUCKY  
COUNTY OF Hickman

Sworn, acknowledged, and signed before me to be her true act and deed this

24 day of June, 2022 by Mary B. Potter, Affiant..

Shannon R. Payne  
NOTARY PUBLIC,  
STATE AT LARGE  
MY COMM EXPIRES July 16, 2024

SHANNON R. PAYNE  
NOTARY PUBLIC  
STATE AT LARGE  
KENTUCKY  
MY COMMISSION EXPIRES JULY 16, 2024