

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY- )  
AMERICAN WATER COMPANY FOR A )  
CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY ) CASE NO. 2023-00248  
AUTHORIZING THE CONSTRUCTION OF )  
A WATER TRANSMISSION MAIN TO THE )  
CITY OF MILLERSBURG )

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**CITY OF PARIS'S  
MOTION TO INTERVENE**

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City of Paris (Paris”), by counsel, hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 4(11) for intervention in the above-styled matter. In support of its motion, Paris states the following:

The City of Paris is a city of the home rule class. Its mailing address is 525 High Street Paris, KY 40361.

The Commission has interpreted KRS 278.040(2) as requiring a person seeking intervention to 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. *See Order, Kentucky Power Co.*, Case No. 2017-00179 (Ky. PSC June 19, 2017). This matter involves an issue related to Kentucky-American Water Company’s (“KAWC”) service to its customers. The Commission, therefore, has jurisdiction. In addition, Paris further meets this requirement because it provides wholesale water service to KAWC.

Administrative regulation 807 KAR 5:001, Section 4(11)(b) states:

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.

Paris meets both these criteria. Paris has a special interest in KAWC's application that will not otherwise be adequately represented. Paris is in a contractual relationship with KAWC to provide wholesale water service to KAWC. On July 29, 2014 Paris and KAWC entered a Water Purchase Agreement ("Agreement") to supply KAWC with up to 200,000 gallons of water per month to meet KAWC's requirements. *See* Kentucky-American Water Company's Verified Application, Ex. 1 at 1. According to KAWC's application, it purchased \$187,000 worth of water from Paris in 2022. *Id.* at ¶13. In addition, KAWC's proposed transmission main will be located near water mains and other infrastructure owned by Paris. Paris has a special interest in maintaining its customer base. Ultimately, no other party could adequately represent these special interests of Paris.

Paris is also likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. In this particular case, KAWC alleges that the supply of water and the quality of water "at times, is inadequate." *See* Kentucky-American Water Company's Verified Application at ¶¶ 5-6. Paris can provide additional information on its ability to provide wholesale water service.

Paris desires to play a constructive role in this matter and isolate issues that are most important to it. Paris's focus will serve to neither unduly complicate nor disrupt the proceeding.

Attorneys for Paris listed below possess the facilities to receive electronic transmission of all notices and messages related to this proceeding at the electronic mailing addresses listed below. All correspondence to Paris should be sent to the attorneys' addresses or email addresses listed below.

Accordingly, because Paris has a special interest in this case that is not otherwise adequately represented and because it is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. Paris respectfully requests intervention in this proceeding.

Respectfully submitted,



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