COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF THE CITY OF)	
FALMOUTH TO INCRESAE THE WHOLESALE)	CASE NO.
WATER RATES CHARGED TO EAST)	2024-00244
PENDLETON WATER DISTRICT AND)	
PENDLETON COUNTY WATER DISTRICT)	

MOTION TO INTERVENE BY EAST PENDLETON WATER DISTRICT AND PENDLETON COUNTY WATER DISTRICT

Comes now East Pendleton Water District and Pendleton County Water District (collectively referred to as "Districts") to request full intervenor status in the above referenced case as provided by 807 KAR 5:001, Section 4(11)(b). The Districts' motion is timely filed prior to August 23, 2024, the due date for such filings established by the Commission's August 12, 2024 Order. Further, being greatly affected by the City's proposed tariff like no other person or entity, the Districts have a special interest that will not be adequately represented in the Commission's proceedings unless they are allowed full intervenor status. The Districts participation will undoubtedly present issues and develop facts that will assist the Commission in its review of the City's tariff without undue complication or disruption to the Commission's proceedings.

Respectfully submitted,

/s/ Joseph P. Cottingham
Joseph P. Cottingham, Esq.
Counsel for Districts
KY Bar #89620
Daley, Cottingham, Brandt & Asc., PLLC
4034 Alexandria Pike
Cold Spring KY 41076
(859) 547-4455

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail this 20th day of August 2024, to the parties of record listed below.

/s/ Joseph P. Cottingham
Joseph P. Cottingham, Esq.
Counsel for Districts
KY Bar #89620
Daley, Cottingham, Brandt & Associates, PLLC
4034 Alexandria Pike
Cold Spring KY 41076
(859) 547-4455

City of Falmouth 230 Main Street Falmouth, KY 41040

Luke Price City of Falmouth 230 Main Street Falmouth, KY 41040

Ramona Williams City of Falmouth 230 Main Street Falmouth, KY 41040