

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION)	
INTO CITY OF ALBANY FOR)	CASE NO.
ALLEGED ASSESSMENT OF AN)	2025-00390
UNAPPROVED RATE FOR)	
CUMBERLAND COUNTY WATER)	
DISTRIC)	

MOTION FOR INTERVENTION

By and through the undersigned counsel, and pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2) Cumberland County Water District (“Cumberland District”) requests that it be granted full intervenor status in the above-captioned proceeding.

In support of its Motion Cumberland District states the following:

1. 807 KAR 5:001, Section 4(11)(a)(1) requires that a person requesting leave to intervene as a party to a case before the Commission, by timely motion, must state his or her interest in the case and how intervention 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.

2. 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 develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

3. Cumberland District's mailing address and electronic mail address, along with the names, addresses, and electronic mail addresses for the attorneys authorized to represent Cumberland District in this proceeding are:

Michael Ballard, General Manager
Cumberland County Water District
133 Lower River Street
Burkesville, KY 42717
ccwateroffice@yahoo.com

Damon R. Talley
Stoll Keenon Ogden PLLC
112 North Lincoln Boulevard
P.O. Box 150
Hodgenville, Kentucky 42748
Telephone: (270) 358-3187
Fax: (270) 358-9560
damon.talley@skofirm.com

Tina C. Frederick
Stoll Keenon Ogden, PLLC
300 West Vine Street, Ste 2100
Lexington, KY 40507-1801
(859) 231-3951
Fax: (859) 259-3517
tina.frederick@skofirm.com

4. By Order entered December 23, 2025, The Commission established January 23, 2026, as the deadline for requests for intervention.

5. Cumberland District's motion for intervention in this proceeding is timely.

6. Cumberland District has a special interest in this case. Cumberland District has allegedly been charged an unapproved rate by the City of Albany, Kentucky ("Albany").

7. The Commission reduced Cumberland District's Purchased Water Expense in its recent rate case because Albany was allegedly charging Cumberland District a rate other than the rate in Albany's Commission-approved tariff.¹

8. In its Order establishing this proceeding, the Commission found that one objective of this case is to determine whether Albany should provide a refund to Cumberland District.²

9. Cumberland District's special interest cannot be adequately represented by any existing party, as there is no other party to this proceeding that has allegedly been charged an unapproved rate by Albany, and to whom a refund may be warranted. Accordingly, it is important that the interests of Cumberland District are represented in this proceeding.

¹ *Electronic Application of Cumberland County Water District for an Adjustment of Rates Pursuant to 807 KAR 5:076*, Order, Case No. 2025-00226 (KY PSC Dec. 23, 2025).

² Initiating Order at 3, Case No. 2025-00390, (Ky. PSC Dec. 23, 2025).

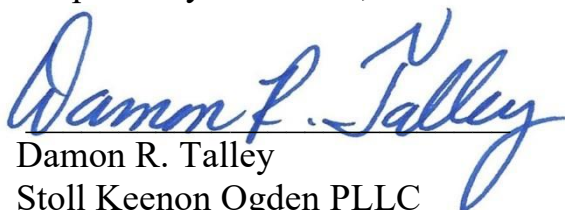
10. Cumberland District's intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matters at hand. Cumberland District has been working with its accountant to ascertain the amount Cumberland District was overcharged and the time period in which it occurred.

11. Cumberland District is prepared to actively participate in these proceedings, and not to unduly complicate or disrupt the proceedings.

WHEREFORE, based on the forgoing Cumberland District requests that it be granted full intervenor status in the above-captioned proceeding

Dated: January 19, 2026

Respectfully submitted,



Damon R. Talley
Stoll Keenon Ogden PLLC
112 North Lincoln Boulevard
P.O. Box 150
Hodgenville, Kentucky 42748
Telephone: (270) 358-3187
Fax: (270) 358-9560
damon.talley@skofirm.com

Tina C. Frederick
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507
Telephone: (859) 231-3951
Fax: (859) 253-1093
tina.frederick@skofirm.com
*Counsel for Cumberland County
Water District*

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was submitted electronically to the Public Service Commission on January 19, 2026, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

/s/ Tina C. Frederick
Tina C. Frederick