

DAMON R. TALLEY, P.S.C.

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DAMON R. TALLEY

ATTORNEY AT LAW

June 15, 2009

Mr. Jeff DeRouen
Executive Director
Public Service Commission
PO Box 615
Frankfort, KY 40602

RECEIVED

JUN 16 2009

PUBLIC SERVICE
COMMISSION

RE: Case No. 2009-00162
Green River Valley Water District

Dear Mr. DeRouen:

Enclosed are the original and ten (10) copies of the Motion for Full Intervention which is being filed on behalf of the Horse Cave Water Commission.

Yours truly,

DAMON R. TALLEY, P.S.C.


DAMON R. TALLEY

DRT:ms

Enclosures

cc: Hon Pat Ross, Attorney for GRVWD
David Paige, General Manager, GRVWD
Horse Cave Water Commission

In the Matter of:

THE APPLICATION OF GREEN RIVER)
VALLEY WATER DISTRICT FOR)
FINANCING AND A CERTIFICATE OF) CASE No. 2009-00162
CONVENIENCE AND NECESSITY TO)
CONSTRUCT A WATERWORKS PROJECT)

**HORSE CAVE WATER COMMISSION’S
MOTION FOR FULL INTERVENTION**

Comes the Horse Cave Water Commission, by Counsel, pursuant to 807 KAR 5:001, Section 3(8), and all other applicable rules and regulations of the Commission, and moves for leave to intervene in this case. **Full intervention** rights are being sought.

1. The Horse Cave Water Commission (“Horse Cave”), a component entity of the City of Horse Cave, Kentucky, pursuant to the provisions of KRS Chapter 96, oversees the operation and management of the municipal water system owned by the City of Horse Cave, Kentucky.

2. Horse Cave is the largest wholesale water customer of the Green River Valley Water District (“Green River District”).

3. The application filed by Green River District asserts that construction of the proposed waterworks improvement project is necessary to meet the increased water demands in Horse Cave.¹

4. Consequently, Horse Cave has a special interest in this proceeding which is not otherwise adequately represented. Full intervention by Horse Cave will enable it to present issues and to develop facts that will assist the Commission in fully considering this matter. Full intervention by Horse Cave will not unduly complicate or disrupt this proceeding.

5. Horse Cave requests that it be permitted to intervene as a party in this proceeding to the fullest extent permitted by law and the applicable regulations of the Commission so that it will be served with Commission orders, testimony, data requests, responses to data requests, exhibits, pleadings, correspondence, and all other documents filed by all parties and by the Commission.

6. Full intervention by Horse Cave will enable it to present issues and to develop facts that should assist the Commission and help expedite the review process.

¹ See Application of Green River District at pages 4 and 5.

7. The address of Horse Cave is as follows:

Horse Cave Water Commission
313 South Dixie Street
Horse Cave, KY 42749

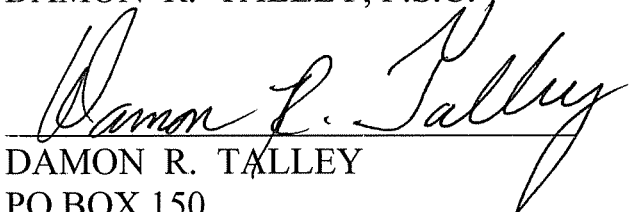
Attn: Chris Houk, Secretary

8. The undersigned is an attorney at law and is representing Horse Cave in this matter.

WHEREFORE, the Horse Cave Water Commission respectfully requests that it be permitted to intervene in this case and that it be granted **full intervention** status.

This 15th day June, 2009.

Respectfully submitted,
DAMON R. TALLEY, P.S.C.


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