

February 22, 2010

Jeff R. DeRouen
Executive Director
Kentucky Public Service Commission
P. O Box 615
211 Sower Blvd.
Frankfort, KY 40602-0615

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FEB 23 2010

PUBLIC SERVICE
COMMISSION

Re: Case No. 2009-00548
Case No. 2009-00549

Dear Mr. DeRouen:

Please find enclosed the original and ten (10) copies of two Motions for Full Intervention that we are submitting for filing on behalf of the Kentucky Cable Telecommunications Association.

Thank you and please let me know if you have any questions.

Very truly yours,

WYATT, TARRANT & COMBS, LLP



Frank F. Chuppe

FFC/mw

cc: Randy Hollis
Gardner F. Gillespie
Dominic F. Perella

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**COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN)
ADJUSTMENT OF BASE RATES)

CASE NO. 2009-00548

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**PUBLIC SERVICE
COMMISSION**

**KENTUCKY CABLE TELECOMMUNICATIONS
ASSOCIATION'S MOTION TO INTERVENE**

The Kentucky Cable Telecommunications Association ("KCTA") respectfully moves for full intervention in the above-referenced proceeding pursuant to K.R.S. § 278.310 and 807 KAR 5:001, § 3(8).

KCTA is a non-profit organization consisting of 118 cable television systems serving the majority of cable customers throughout Kentucky. Several KCTA members attach their facilities to the utility poles of Kentucky Utilities Company("Kentucky Utilities"), and they accordingly are directly affected by that portion of Kentucky Utilities' rate-adjustment application that seeks to increase the utility's pole attachment rates. The Commission has regularly approved KCTA's intervention in ratemaking proceedings and pole attachment cases to protect its members' interest in reasonable rates. Indeed, the Commission has regulated pole attachment rates since 1982, and KCTA has represented its members in virtually every pole attachment case that has arisen during that period.

KCTA's intervention is in lieu of the individual intervention of its affected members. Consequently, KCTA's intervention will promote the efficient progress of this proceeding by reducing the burden on other parties and on the Commission. It also will allow the interests of KCTA's members to be represented without the burden of each being required to retain its own counsel and make its own filings.

KCTA seeks full intervenor status pursuant to 807 KAR 5:001 § 3 to allow it to fully participate as a party and to be served with documents related to LG&E's application. KCTA pledges to adhere to all Commission rules and procedures applicable to it as a party intervenor. The undersigned attorneys are authorized to represent KCTA in this proceeding and to take service of all documents.

WHEREFORE, KCTA moves for full intervention in the above proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion to Intervene was served upon the following, by U.S. Mail, postage prepaid, on this the 20th day of February, 2010

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