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PUBLIC SERVICE
COMMISSION



Lexington-Fayette Urban County Government
DEPARTMENT OF LAW

Jim Gray
Mayor

Janet M. Graham
Commissioner

May 9, 2013

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: Case No. 2013-00167
(Columbia Gas of Kentucky, Inc.)

Dear Mr. Derouen:

Please find enclosed herewith for filing an original and ten (10) copies of Lexington-Fayette Urban County Government's Motion to Intervene in the referenced matter.

Yours truly,

A handwritten signature in cursive script, appearing to read "David J. Barberie".

David J. Barberie
Managing Attorney

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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:


APPLICATION OF COLUMBIA GAS OF)
KENTUCKY, INC. FOR AN INCREASE IN)
ITS BASE RATES BASED UPON A FULLY)
FORECASTED TEST YEAR)

CASE NO. 2013-00167

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S MOTION FOR FULL INTERVENTION AND WAIVER**

COMES the Lexington-Fayette Urban County Government ("Lexington"), by counsel, and pursuant to 807 KAR 5:001 Section 3(8), moves that it be granted leave to intervene in this matter and that it be granted full intervention status. Approval of the application in this matter will have a significant impact on Lexington and the citizens of Fayette County. Lexington has a special interest in this matter, and it will not be adequately represented by the other parties. Lexington's participation in this matter is likely to assist the Commission in developing and identifying facts and issues and in fully considering this matter without unduly complicating or disrupting the proceedings.

Respectfully submitted,

BY: 

David J. Barberie
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Department of Law
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Lexington, Kentucky 40507
(859) 258-3500
Attorneys for Lexington-Fayette Urban
County Government

FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, on May 9, 2013:

Honorable Stephen B. Seiple
Attorney at Law
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OHIO 43216-0117

ATTORNEY FOR LEXINGTON-FAYETTE
URBAN COUNTY GOVERNMENT

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