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PUBLIC SERVICE  
COMMISSION

May 17, 2013

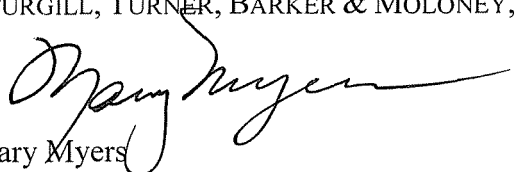
Jeff DeRouen, Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602-0615

In re Fern Lake Company Rate Adjustment, Case No. 2013-00172

Dear Mr. Derouen:

Please find an original and 10 copies of the enclosed Motion to Intervene to be filed of record in the above-referenced matter. Please return an extra copy to us with the Clerk's stamp. A self-addressed stamped envelope is enclosed for your convenience. Thank you for your assistance.

Sincerely,  
STURGILL, TURNER, BARKER & MOLONEY, PLLC



Mary Myers  
Legal Assistant

/mlm

Enclosures

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

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MAY 20 2013

PUBLIC SERVICE  
COMMISSION

In the Matter of:

Application of Fern Lake Company	)	
For Rate Adjustment For Small Utilities	)	Case No. 2013-00172
Pursuant to 807 KAR 5:076	)	

**MOTION TO INTERVENE**

Pursuant to 807 KAR 5:001, Section 5(11), Water Service Corporation of Kentucky (“WSCK”), 1221 East Cumberland Avenue, Middlesboro, Kentucky 40965, by counsel, hereby moves to intervene in the above-styled proceeding.

Intervention in Commission proceedings is generally within the Commission’s discretion. Regulations specify that the Commission allow intervention if the moving party “has a special interest in the case that is not otherwise adequately represented or that intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.” 807 KAR 5:001, Section 5(11)(b).

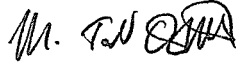
As Fern Lake Company’s (“Fern Lake”) only customer, WSCK undoubtedly has a special interest in any adjustment in Fern Lake’s rate for water sales because WSCK’s revenues and expenditures will be affected. Any increase in Fern Lake’s rates will necessitate a purchased water adjustment by WSCK.<sup>1</sup> In addition, WSCK is likely to present issues and develop facts in a way that will assist the Commission in considering Fern Lake’s application.

<sup>1</sup> WSCK filed an application in Case No. 2013-00179 for a purchased water adjustment commensurate with Fern Lake’s proposed increase.

The Commission commonly grants intervention to wholesale purchasing utilities when their suppliers apply for a rate increase. *See, e.g., Frankfort Plant Board*, Case No. 2008-00250 (Ky. PSC July 2, 2008); *cf. City of Brandenburg*, Case No. 2012-00501 (Nov. 19, 2012).

WHEREFORE, WSCK respectfully requests intervention in this matter.

Respectfully submitted,



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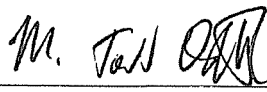
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ATTORNEYS FOR WSCK

CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing was served on this 17th day of May, 2013, by mail to:

David Samford  
Goss Samford PLLC  
2365 Harrodsburg Road  
Suite B-130  
Lexington, KY 40504

By:   
M. Todd Osterloh