

Via Hand Delivery

March 18, 2015

Jeff R. Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

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MAR 18 2015

PUBLIC SERVICE
COMMISSION

Re: *In The Matter Of: Application Of Bullitt Utilities, Inc., For A Certificate Of Convenience And Necessity, And Surcharge For Same, Case No. 2014-00255*

Dear Mr. Derouen:

Enclosed please find for filing with the Commission the original and 10 copies of the Motion Of Veolia For Full Intervention in the above styled matter.

Please do not hesitate to contact me if you have any questions concerning this filing.

Thank you.

Sincerely,



Holland N. McTyeire V

HNM/jh

Enclosures

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PUBLIC SERVICE
COMMISSION

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

IN THE MATTER OF:)

APPLICATION OF BULLITT UTILITIES,
INC., FOR A CERTIFICATE OF)
CONVENIENCE AND NECESSITY, AND)
SURCHARGE FOR SAME)

CASE NO. 2014-00255

MOTION OF VEOLIA FOR FULL INTERVENTION

Veolia Water Technologies, Inc. (formerly Veolia Water Solutions & Technologies North America, Inc.) (“Veolia”), through counsel, moves the Commission pursuant to 807 KAR 5:001 Section 4(11) for Full Intervention in this Application filed by Bullitt Utilities, Inc. (“Bullitt”) for a Surcharge. The grounds in support of Veolia’s Motion are set forth below.

1. Veolia’s participation in this matter is necessary to protect its interest in the Commission’s consideration of the Application of Bullitt for a Surcharge. A primary reason for Bullitt’s Application for a Surcharge is to pay Veolia for a temporary wastewater treatment system it has supplied to and related services it has performed for Bullitt in responding to the catastrophic failure of the Hunters Hollow Wastewater Treatment Plant (the “Treatment Plant”) on March 29, 2014. As of the date of this Motion, Bullitt owes Veolia about \$1,400,000. The amount Bullitt owes Veolia increases by over about \$6,000 per day, although that amount is subject to variation based on numerous factors. The amount owed by Bullitt to Veolia will continue to increase until a solution for the Treatment Plant is developed, which will eliminate the continuing need for Veolia’s assistance.

2. Veolia is the most qualified entity to explain the services it has performed for Bullitt and the costs of those services which are essential to protecting the environment and the

health, safety and general welfare of the residents of Bullitt County who rely on the Treatment Plant until a more permanent solution is implemented.

3. Veolia's participation in this matter will not prejudice the rights of any party.

4. Veolia has reviewed the Commission's March 6, 2015 Order establishing a Procedural Schedule and Veolia will abide by the Procedural Schedule adopted by the Commission.

5. The below counsel will be representing Veolia in this matter and all of their contact information is set forth below. All pleadings and correspondence should be directed to their attention. Veolia's full name and mailing address are set forth below:

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Mark S. Riddle
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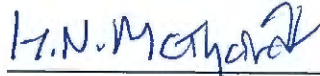
Veolia has been advised that this case has not been established under the Commission's Electronic Case Filing System.

6. Veolia meets the standard for granting Full Intervention in 807 KAR 5:001 Section 4(11)(b). Veolia has a special interest in this matter that is not otherwise adequately

represented. Veolia's Full Intervention is likely to present issues or develop facts that will assist the Commission in its full consideration of this matter. Veolia's Full Intervention will not unduly complicate or disrupt the proceedings

For the reasons set forth above, Veolia's Motion for Full Intervention should be granted.

Respectfully submitted,



Holland N. McTyeire, V
Mark S. Riddle

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COUNSEL FOR VEOLIA WATER
TECHNOLOGIES, INC.

CERTIFICATE OF SERVICE

I certify that the Motion of Veolia for Full Intervention was mailed sufficient U.S. postage prepaid, on this 18th day of March, 2015 to:

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