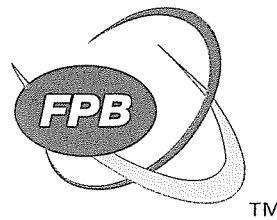


Jim Smith
General Manager



Frankfort Plant Board

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February 29, 2012

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VIA HAND DELIVERY

FEB 29 2012

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602

PUBLIC SERVICE
COMMISSION

RE: Public Service Commission Case No. 2011-00419

Dear Mr. Derouen:

Please find enclosed for filing an original and eight (8) copies of the Electric Water and Plant Board's Motion for Full Intervention in connection with the Northeast Woodford County Water District and the above captioned case.

If you have any questions regarding the enclosed filing, please do not hesitate to contact me at 352-4541.

Sincerely,

Hance Price

Hance Price
Staff Attorney

MHP/kp
Enclosures

Equal Opportunity/Affirmative Action Employer

317 West Second Street (P.O. Box 308) Frankfort, Kentucky 40602 Phone (502) 352-4372
Fax (502) 223-3887 www.fpb.cc

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

FEB 29 2012

In the Matter of:

PUBLIC SERVICE COMMISSION

PROPOSED REVISION OF RULES)
 REGARDING THE PROVISION OF) CASE NO. 2011-00419
 WHOLESALE WATER SERVICE BY THE)
 CITY OF VERSAILLES TO NORTHEAST)
 WOODFORD WATER DISTRICT)

MOTION FOR FULL INTERVENTION

Comes the Electric and Water Plant Board of the City of Frankfort, KY (“FPB”), by counsel, and respectfully moves that it be granted leave to fully intervene in the above captioned case. As grounds for this motion FPB states as follows:

1. That FPB currently has a contract dated April 19, 2011 to supply water to the Northeast Woodford County Water District (“Northeast Woodford District” or “District”).
2. That this contract currently requires the Northeast Woodford District to purchase a minimum of 3,000,000 gallons per month from FPB. This minimum was mutually agreed upon by the parties.
3. That within the last month, John S. Davis, Chairman of the Northeast Woodford District, told David Billings, FPB’s Chief Water Engineer, that this matter was presently pending before the Commission. FPB received no other notice that this matter was pending.
4. That in its filing letter dated September 19, 2011 the City of Versailles noted “the City believes that its interests as well as the interests of NWWD, NWWD’s

customers and the Frankfort Plant Board would be better served by establishing a minimum monthly purchase requirement for NWWD before it purchases water from any other source.” FPB respectfully disagrees that establishing a minimum monthly purchase requirement is in its best interest.

5. That FPB currently charges the Northeast Woodford District \$1.81 per 1,000 gallons. This rate will increase to \$1.91 per 1,000 gallons on April 1, 2012 and to \$2.01 per 1,000 gallons on April 1, 2013. The City of Versailles currently charges the Northeast Woodford District \$2.26 per 1,000 gallons.

6. That if the City of Versailles’ proposed tariff is approved, then this could affect the rates charged by Northeast Woodford District as well as FPB’s wholesale rate charged to Northeast Woodford District and its other wholesale customers. Moreover, Northeast Woodford District currently purchases less than 15 million gallons per month. Thus, the minimum requested by the City of Versailles would not permit Northeast Woodford District to purchase water from FPB to the detriment of the District’s customers.

7. That FPB does not seek any extension in the procedural schedule contained in the Commission’s Order entered on January 30, 2012. Rather, FPB respectfully requests an opportunity to respond to any argument made by the City of Versailles that it is in the best interest of either the FPB or Northeast Woodford District to establish a minimum monthly purchase requirement.

8. That no party will suffer any prejudice nor will the proceedings be delayed if the Commission grants this motion.

9. That no other party can adequately represent FPB’s interest in this matter.

WHEREFORE, for the foregoing reasons, FPB respectfully requests that it be granted the full rights of a party and be served with Commission Orders and all documents filed by any party to this proceeding.

Respectfully Submitted,

Hance Price
Hance Price, Staff Attorney
Frankfort Plant Board
P.O. Box 308
317 W. Second St.
Frankfort, KY 40602

CERTIFICATE OF SERVICE

I, Hance Price, hereby certify that on the 29th day of February, 2012 a true and accurate copy of the foregoing Motion for Full Intervention was served by U.S. mail to the following: John S. Davis, Chairman, Northeast Woodford County Water District, 225A South Main Street, Versailles, Kentucky 40383; Joseph M. Hoffman, Joseph M. Hoffman and Associates, 100 United Drive, Suite 4B, Versailles, Kentucky 40383; and William K. Moore, 126 South Main Street, Versailles, Kentucky 40383; and by hand delivery of an original and eight copies to Mr. Jeff Derouen, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, P.O. Box 615 Frankfort, KY 40602-0615.

Hance Price
Hance Price, Staff Attorney