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July 11, 2014

Jeff Derouen, Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602

RECEIVED  
JUL 14 2014  
PUBLIC SERVICE  
COMMISSION

Re: Case No. 2014-\_\_\_\_\_  
Proposed Adjustment of the Wholesale Water Service Rates of  
the Frankfort Electric and Water Plant Board

Dear Mr. Derouen:

Enclosed are the original and 8 copies of the Joint Motion for Full Intervention and Motion to Suspend Rates with regard to the captioned tariff file. We have also enclosed an extra copy, which we ask you file-stamp and return to me in the enclosed self-addressed, stamped envelope.

If you have any questions regarding this matter, please do not hesitate to call me.

Yours truly,

MATHIS, RIGGS, PRATHER & RATLIFF, P.S.C.

By: Donald T. Prather  
Donald T. Prather

By Paula McElwain

DTP/pm  
Enclosures

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
JUL 14 2014  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE )  
WATER SERVICE RATES OF THE FRANKFORT )  
ELECTRIC AND WATER PLANT BOARD )

CASE NO. 2014-\_\_\_\_\_


JOINT MOTION FOR FULL INTERVENTION  
AND  
MOTION TO SUSPEND RATES

Come North Shelby Water Company ("North Shelby"), PO Box 97, Bagdad, Kentucky 40003; U.S. 60 Water District of Shelby and Franklin Counties, Kentucky ("U.S. 60"), PO Box 97, Bagdad, Kentucky 40003, and Elkhorn Water District ("Elkhorn"), PO Box 67, Frankfort, Kentucky 40602, by counsel, and respectfully move that they be granted leave to fully intervene in the captioned rate case, and move that the rate increase be suspended pending a decision in this case. As grounds for this motion, Elkhorn and U.S. 60 state they purchase all of their from the Frankfort Electric and Water Plant Board ("Frankfort"). North Shelby purchases approximately one-half of its water from Frankfort. The proposed rate increase, if granted, would significantly increase the water rates for the customers of Elkhorn, North Shelby and U.S. 60 and therefore each utility respectfully requests full intervention in this case. North Shelby, U.S. 60, and Elkhorn believe their different perspectives as wholesale customers of Frankfort will likely present issues and develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceeding.

North Shelby, U.S. 60 and Elkhorn further move that the Commission suspend the effective date of the proposed rate increase pending a thorough examination by the Commission of whether Frankfort's proposed new rate is a fair, just and reasonable rate.

Respectfully submitted,

MATHIS, RIGGS, PRATHER & RATLIFF, P.S.C.

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Attorney for Movants

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was this 11<sup>th</sup> day of July, 2014 mailed to the following:

Herbbie Bannister, P.E., General Manager  
Frankfort Electric and Water  
Plant Board  
PO Box 308  
Frankfort, Kentucky 40602

  
Donald T. Prather