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July 17, 2014

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

RECEIVED

JUL 18 2014

PUBLIC SERVICE
COMMISSION

Re: TFS 2014-00401
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



DTP/pm
Enclosures

RECEIVED

JUL 18 2014

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)
WATER SERVICE RATES OF THE FRANKFORT) TFS 2014-00401
ELECTRIC AND WATER PLANT BOARD)

JOINT MOTION FOR FULL INTERVENTION
AND
MOTION TO SUSPEND RATES


Come Peaks Mill Water District, 7165 US 127 North, Frankfort, Kentucky 40601 ("Peaks Mill"); Northeast Woodford Water District, 225 S Main Street, # A, Versailles, Kentucky 40383 ("Northeast Woodford"); and Farmdale Water District, 100 Highview Drive, Frankfort, Kentucky 40601 ("Farmdale"), 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, Peaks Mill and Farmdale state they purchase all of their water from the Frankfort Electric and Water Plant Board ("Frankfort"). Northeast Woodford is physically connected to the Frankfort system including an installed master meter and is expecting to begin purchasing Frankfort water any day. The proposed rate increase, if granted, would significantly increase the water rates for the customers of Peaks Mill, Farmdale and Northeast Woodford and therefore each utility respectfully requests full intervention in this case. Peaks Mill, Farmdale and Northeast Woodford 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.

Peaks Mill, Farmdale and Northeast Woodford 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.

By: 
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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 17th 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