SEP 24 2015

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BUSH GARDENS ENTERPRISES, LLC)	CASE NO.
ALTERNATIVE RATE FILING ADJUSTMENT,)	2015-00306
INITIAL OPERATIONS, AND TARIFFS)	

ATTORNEY GENERAL'S MOTION TO INTERVENE AND OBJECTION TO BUSH GARDENS ENTERPRISES, LLC'S REQUEST FOR EXPEDITED REVIEW

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and pursuant to KRS 367.150(8), which grants him the right and obligation to appear before regulatory bodies of the Commonwealth of Kentucky to represent consumers' interests, hereby moves the Public Service Commission to grant him status as an intervenor party in this action pursuant to 807 KAR 5:001 Section 4(11).

Furthermore, the Attorney General objects to Bush Gardens Enterprises, LLC's ("BGE") request for deviation from 807 KAR 5:076. BGE has requested an expedited review of only thirty days to evaluate its pending application, instead of the six month period set forth in 807 KAR 5:076(7). Due to the fact that BGE is proposing an extraordinarily high monthly residential sewer rate of \$194.61 to be placed upon its customers, the Attorney General respectfully requests the full six month review period in order to fully develop the record, allow for public comment, and investigate whether there are lesser cost alternatives.

Wherefore, the Attorney General requests status as an intervenor party in the present action. The Attorney General further requests that the Commission DENY BGE's request for deviation from 807 KAR 5:076 and expedited review of its pending application.

Respectfully submitted,

JACK CONWAY

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Certificate of Service and Filing

Counsel certifies that an original and five photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Hon. Aaron R. Davis Hon. Stephanie L. Davis The Davis Firm, PLLC 165 Evergreen Lane Pikeville, Kentucky 41501

this 24th day of September, 2015.

Assistant Attorney General