

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

**RECEIVED**

**MAR 25 2016**

**PUBLIC SERVICE  
COMMISSION**

In the Matter of:

APPLICATION OF WKG STORAGE, INC. FOR )  
RATE ADJUSTMENT FOR SMALL UTILITIES ) CASE NO.  
PURSUANT TO 807 KAR 5:076 ) 2016-00053

ATTORNEY GENERAL'S MOTION TO DEVIATE FROM THE PROCEDURAL  
SCHEDULE

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and prays the Commission grants the Attorney General Intervenor status in this case and respectfully requests a deviation from the procedural schedule set forth in Commission's order dated March 11, 2016., to permit the Attorney General time to determine if this entity is a utility under the Commission's jurisdiction, and if it is, to delve into the relationship between WKG Storage Inc. and Atmos Energy.

In support of this motion, the Attorney General points to the seemingly hastened procedural schedule set by the Commission, as this is a precedential case and the effects on the entire regulation of gas in this state and others will likely be impacted, to the detriment of all classes of rate-payers. Additionally, the unusually accelerated process that this case has taken since first being filed has hampered the Attorney General in its attempt to determine the degree to which this case will conflict with the Commission's traditional treatment of storage and transmission companies. Currently the Attorney General's Office of Rate Intervention is undergoing a transition, resulting in increased pressure on existing resources, and the Attorney General prays that the Commission provide them with intervention and an altered procedural

schedule that gives the Attorney General more time to research and address such an important and precedential case.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to James W. Gardner, Acting 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:

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WKG Storage, Inc.  
2929 W Sam Houston Pkwy  
Houston, TX 77043

Atmos Energy Company  
Atmos Energy Corporation  
3275 Highland Pointe Drive  
Owensboro, KY 42303

This 25<sup>th</sup> day of March, 2016



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Assistant Attorney General