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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

JAN 23 2017

Public Service Commission

IN THE MATTER OF:

ELECTRONIC APPLICATION OF BULLITT)	
UTILITIES, INC. FOR A SURCHARGE)	CASE NO. 2016-00401

MOTION OF CITY OF HUNTERS HOLLOW, KENTUCKY

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Now comes City of Hunters Hollow, Kentucky (Hunters Hollow) and moves that it be granted full intervention herein. In support of this motion, Hunters Hollow states as follows:

- 1. City of Hunters Hollow, Ky's address is 11300 Angelina Road, Louisville, Bullitt County, Kentucky 40229, no email address.
- 2. Hunters Hollow is a home rule municipal corporation of the Commonwealth of Kentucky and all of its residents and citizens were previously served by Bullitt Utilities and although not currently served by Bullitt Utilities would be directly impacted by any surcharge that may be imposed. These residents and citizens who inhabit the 150 homes and apartments and several businesses are now served by the Bullitt County Sanitation District as Bullitt Utilities legally abandoned any obligation to provide service to these homes and apartments and businesses. The outcome of this case will affect the individual citizens and businesses located within the municipal boundary, will have a direct economic impact on the ability of the City to insure sanitary sewer service at a reasonable rate to its current and future residents and businesses.
- 3. Hunters Hollow should be permitted to intervene because its interest are not otherwise adequately represented by any other party. Further its intervention will likely present

issues or develop facts that may assist the Commission in full consideration of the matter without unduly complicating or disrupting the proceedings and without prejudice to any other party.

WHEREFORE, Hunters Hollow moves to be granted full intervention and that it be afforded any and all relief to which it may appear entitled.

Respectfully submitted,

MARK E. EDISON

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CERTIFICATE OF SERVICE

I hereby certify a copy hereof was mailed to Bullitt Utilities, Inc. dba Hunters Hollow Sewer, P. O. Box 818, Hillview, KY 40129; Holland N. McTyeire V, Bingham Greenebaum Doll LLP, 3500 National City Tower, 101 South Fifth Street, Louisville, KY 40202; Jeanette M. Henson, Bingham Greenebaum Doll LLP, 3500 National City Tower, 101 South Fifth Street, Louisville, KY 40202; James R. Irving, Bingham Greenebaum Doll LLP, 3500 National City Tower, 101 South Fifth Street, Louisville, KY 40202; Kent Chandler, Assistant Attorney General, Office of the Attorney General Utility & Rate, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204; Rebecca W. Goodman, Assistant Attorney General, Office of the Attorney General Utility & Rate, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204; Robert W. Keats, Keats & Schwietz, PLLC, P. O. Box 221377, Louisville, KY 40252; S. Morgan Faulkner, Office of the Attorney General Utility & Rate, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204; Susan H. Mays, Bingham Greenebaum Doll LLP, 3500 National City Tower, 101 South Fifth Street, Louisville, KY 40202; Tammy R. Baker, City Attorney, 295 South Buckman Street, P. O. Box 1158, Shepherdsville, KY 40165; this 18th day of January, 2017.

MARK E. EDISON