



Lexington-Fayette Urban County Government
DEPARTMENT OF LAW

Jim Gray
Mayor

Janet M. Graham
Commissioner

June 6, 2011

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JUN 8 2011

PUBLIC SERVICE
COMMISSION

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: Case No. 2011-00161
(Kentucky Utilities – 2011 Environmental Surcharge Compliance Plan)

Dear Mr. Derouen:

Please find enclosed herewith for filing an original and 10 copies of Lexington-Fayette Urban County Government's Motion to Intervene in the referenced matter.

Yours truly,

David J. Barberie by Lucy M. Bowman
David J. Barberie
Attorney Senior

ENC

cc: Case Distribution List

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 8 2011

PUBLIC SERVICE
COMMISSION

In the Matter of:

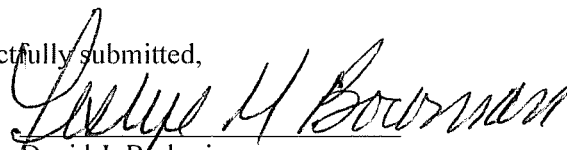
APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR CERTIFICATES OF PUBLIC)
CONVENIENCE AND NECESSITY AND) CASE NO.
APPROVAL OF ITS 2011 COMPLIANCE PLAN) 2011-00161
FOR RECOVERY BY ENVIRONMENTAL)
SURCHARGE)

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S MOTION FOR FULL INTERVENTION**

COMES the Lexington-Fayette Urban County Government ("Lexington"), by counsel, and pursuant to 807 KAR 5:001 Section 3(8), moves that it be granted leave to intervene in this matter and that it be granted full intervention status. Approval of the application in this matter and the programs contained therein will have a significant impact on Lexington and the citizens of Fayette County. Lexington has a special interest in this matter, and it will not be adequately represented by the other parties. Lexington's participation in this matter is likely to assist the Commission in developing and identifying facts and issues and in fully considering this matter without unduly complicating or disrupting the proceedings.

Respectfully submitted,

BY:


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Director of Litigation

Department of Law

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Attorneys for Lexington-Fayette Urban County
Government

FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, and/or by electronic means, as further indicated below, all on this the 10 day of June 2011:

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URBAN COUNTY GOVERNMENT

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