# ROBIN SIMPSON SMITH

Attorney at Law P. O. Box 216 Prestonsburg, Kentucky 41653 (606) 886-9562 RECEIVED

JAN 2 2013
PUBLIC SERVICE
COMMISSION

December 28, 2012

Hon. Virginia Gregg Public Service Commission P. O. Box 615 211 Sower Avenue Frankfort, Kentucky 40602

RE: Kentucky Frontier Gas Company

Case No. 2011-00443

Dear Ms. Gregg:

I have enclosed herewith a copy of a motion I have filed on behalf of First Baptist Church of Salyersville in the above-referenced action. It was suggested to me that I bring this to the attention of counsel for the commission, and you are the person in that office with whom I have communicated.

If there is any other information you need, or if you have questions, please let me know.

Very truly yours,

**Robin Simpson Smith** 

rss

Enclosure

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

#### In the Matter of:

APPLICATION OF KENTUCKY FRONTIER	)	
GAS, LLC FOR APPROVAL OF	)	
CONSOLIDATION OF AND ADJUSTMENT OF	)	
RATES, APPROVAL OF AMR EQUIPMENT	)	
AND A CERTIFICATE OF CONVENIENCE AND	)	CASE NO.
NECESSITY FOR INSTALLATION OF AMR,	)	2011-00443
PIPELINE REPLACEMENT PROGRAM,	)	
REVISIONS OF NON-RECURRING FEES AND	)	
REVISION OF TARIFFS	)	

#### MOTION TO AMEND ORDER

Comes First Baptist Church, Salyersville, Kentucky, Inc., by counsel, and moves the Commission for an Order amending its Order entered December 13, 2012 to change the movant's status from an intervenor "with full rights of a party in this proceeding" (Order p. 4) to that of an informal intervenor. As grounds for same, movant states that its desire and intent in seeking to intervene in this action was to protect its interests, and to ensure that its voice was heard by the Commission. Movant is neither financially nor legally prepared to engage as a full party in this proceeding.

WHEREFORE, Movant prays for an appropriate Order of the Commission.

ROBIN SIMRSON SMITH

Attorney at Law

P. O. Box 216

Prestonsburg, Kentucky 41653

606-886-9562

606-889-0353 (fax)

# CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was this 26<sup>th</sup> day of December, 2012, mailed, postage prepaid, to the following:

# Original to:

Public Service Commission P. O. Box 615 211 Sower Avenue Frankfort, Kentucky 40602

# Copies to:

Hon. John N. Huges Attorney for Kentucky Frontier Gas 124 West Todd Street Frankfort, Kentucky 40601

Joe and Gloria Conley 231 Mine Fork Road Salyersville, Kentucky 41465

ATTORNEYATIAW