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PUBLIC SERVICE
COMMISSION

SOUTH ANDERSON WATER DISTRICT

P. O. BOX 17, 142 SOUTH MAIN STREET
LAWRENCEBURG, KY 40342
502-839-6919

July 17, 2014

Jeff Derouen, Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

RE: Case No. 2014-_____
Proposed Adjustment of the Wholesale Water Service Rates of the
Frankfort Electric and Water Plant Board

Dear Mr. Derouen:

Enclosed are the original and 8 copies of a Motion for Full Intervention and Motion to Suspend Rates with regard to the above referenced rate adjustment proposed. We have also enclosed an extra copy, which we ask you file-stamp and return to us in the enclosed self-addressed, stamped envelope.

If you have any questions regarding this matter, please do not hesitate to contact us.

Yours Truly,



Eddie Stevens
Chairman

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

PROPOSED ADJUSTMENT OF THE WHOLESALE)
WATER SERVICE RATES OF THE FRANKFORT) CASE NO. 2014-_____
ELECTRIC AND WATER PLANT BOARD)

MOTION FOR FULL INTERVENTION

AND

MOTION TO SUSPEND RATES

Comes South Anderson Water District of Anderson County, Kentucky, P.O. Box 17, Lawrenceburg, Kentucky 40342, by counsel, and respectfully moves that it be granted leave to fully intervene in the captioned rate case, and moves that the rate increase be suspended pending a decision in this case. As grounds for this motion, South Anderson Water District states it purchases a significant portion of the water it purchases for resale to its customers from the Frankfort Electric and Water Plant Board ("Frankfort") and has recently completed construction of facilities with the intent to purchase a larger portion of the water in the future. The proposed rate increase, if granted, would significantly increase the water rates for the customers of South Anderson Water District and therefore South Anderson Water District respectfully requests full intervention in this case. South Anderson Water District believes its perspective as a wholesale customer of Frankfort will likely present issues and develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceeding.

South Anderson Water District further moves that the Commission suspend the effective date of the proposed rate increase pending a thorough examination by the Commission of whether Frankfort's proposed new rate is a fair, just and reasonable rate.

Respectfully Submitted,


By: 

Raymond Edelman
148 South Main Street
Lawrenceburg, KY 40342
Phone: (502) 839-5111
Fax: (502) 839-3834
Attorney for Movant

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was this 17th day of July, 2014 mailed to the following:

Herbbie Bannister, P.E., General Manager
Frankfort Electric and Water
Plant Board
P.O. Box 308
Frankfort, Kentucky 40602


Raymond Edelman