

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF SOUTH EASTERN WATER
ASSOCIATION, INC. FOR AN ALTERNATIVE RATE ADJUSTMENT

)
)
) CASE NO. 2026-00233

MOTION FOR FULL INTERVENTION OF MICHAEL HEMPHILL

Comes now **Michael Hemphill**, whose legacy farm address is **6271 Blue John Road, Burnside, Kentucky 42519**, and respectfully moves the Kentucky Public Service Commission ("Commission") for full intervenor status in the above-styled proceeding pursuant to 807 KAR 5:001, Section 4(11). In support of this Motion, Mr. Hemphill states as follows:

1. Mr. Hemphill has a direct and special interest in this proceeding that is not otherwise adequately represented. He is the active complainant in **Case No. 2026-00191**, which was formally filed and docketed forty-five (45) days prior to the initiating application for an alternative rate adjustment in the current matter (Case No. 2026-00233).
2. Mr. Hemphill's legacy farm footprint spans 72.5 contiguous acres of agricultural property completely surrounded by the Daniel Boone National Forest in rural Pulaski County. This critical agricultural asset holds a certified tree farm exemption status established in 2002. Despite filling out three separate farm exemptions directly within the utility's headquarters and maintaining a grandfathered verification tracking mechanism, South Eastern Water Association, Inc. ("SEWA") has systematically overcharged Mr. Hemphill by unlawfully assessing state sales and localized utility taxes across his active agricultural meters, as conclusively verified by his real-time August and September 2026 utility statements currently anchored to the record.
3. Mr. Hemphill's intervention is critical to developing the complete evidentiary record regarding SEWA's overall financial practices, asset management, and underlying revenue requirements. Mr. Hemphill possesses precise physical, geographical, and historical documentary evidence demonstrating that SEWA's primary water storage tower facility—the "Blue John Road Tank"—was constructed via an unauthorized, physical 300-foot boundary invasion square on his private land. This physical encroachment directly bypassed a 91-year-old historic federal survey landmark ("1357 W U S E D stamped number one") placed in 1935 by the U.S. government to secure the historic Luther Farmer and J.G. Farmer estate boundaries.
4. Mr. Hemphill's intervention will provide the Commission with unique data regarding severe operational and compliance reporting non-conformities that undermine the utility's stated capital asset allocations. Public records demonstrate that SEWA has repeatedly misidentified the physical location of this multi-million dollar tower infrastructure asset across ten separate pages of its formal submittals, actively hiding the physical footprint behind a completely false compliance testing address located at **2419 Blue John Road**—a simple fire hydrant at a localized volunteer sub fire station nearly five (5) miles away from the physical tower installation.
5. Furthermore, the utility's defense counsel, including Molly Hardy and the firm of Stoll Keenon Ogden PLLC ("SKO"), has openly confessed in a 61-page submittal to this tribunal that SEWA deliberately engaged in non-compliant, customized, and preferential tariff discrimination by completely withholding mandatory utility minimum service fees on Mr. Hemphill's third stealth-installed meter because there was a "misunderstanding"

and he was upset. Such arbitrary manipulation of billing structures stands in direct violation of the mandatory billing provisions of KRS 278.160 and the strict anti-discrimination prohibitions of KRS 278.170.

6. Given that the City of Burnside operates as the primary wholesale water provider selling utility assets directly to SEWA, and given that Burnside City Attorney Molly Hardy simultaneously operates through her private practice as the defense architect helping SEWA push through an additional \$3.00 monthly minimum meter fee hike targeting the 733 residents inside the city limits and broader county taxpayers, Mr. Hemphill's participation is necessary to expose these multi-layered conflicts of loyalty that directly distort the transparency of SEWA's wholesale operational expenses.

7. Mr. Hemphill's participation will not disrupt the orderly conduct of these proceedings but will instead provide the Commission's staff auditors with essential cross-reference mapping and historical data necessary to fully evaluate the utility's general ledgers under the newly mandated three-year full audit under oath due by November 3, 2026.

WHEREFORE, Michael Hemphill respectfully requests that the Commission grant his Motion for Full Intervenor Status in Case No. 2026-00233 and authorize his formal participation across all subsequent evidentiary procedures, discovery cycles, and administrative hearings.

Dated: October 2, 2026

Respectfully submitted,

Michael Hemphill
6271 Blue John Road
Burnside, Kentucky 42519
Pro Se Intervenor

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion for Full Intervention was served via electronic transmission from my personal email on this 2nd day of October, 2026, to South Eastern Water Association, Inc. and its designated counsel of record, including Molly Hardy (Hardy Law Office PLLC) and Damon Talley (Stoll Keenon Ogden PLLC).

Michael Hemphill