

**COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN)	CASE NO. 2014-00371
ADJUSTMENT OF ITS ELECTRIC RATES)	

**KENTUCKY CABLE TELECOMMUNICATIONS
ASSOCIATION’S MOTION TO INTERVENE**

The Kentucky Cable Telecommunications Association (“KCTA”) respectfully moves for full intervention in the above-referenced proceeding pursuant to K.R.S. § 278.310 and 807 KAR 5:001, § 4(11).

KCTA is a non-profit organization consisting of cable operators serving the majority of cable customers throughout Kentucky. Several KCTA members attach their facilities to the utility poles of Kentucky Utilities Company (“KU”), and they accordingly are directly affected by that portion of KU’s rate-adjustment application that addresses KU’s pole attachment rates.

KCTA does not anticipate any opposition by KU to this motion to intervene. KCTA previously filed a complaint against KU and Louisville Gas and Electric (“LG&E”) (KU and LG&E being referred to collectively as “the Companies”) on January 14, 2014 in Case No. 2014-00025 (the “Complaint”). The Complaint includes allegations regarding the legality and reasonableness of the Companies’ pole attachment rates. *See* Complaint, ¶¶ 21-22. In response to the Complaint, the Companies filed a motion to dismiss the Complaint and a memorandum (“Memorandum”) in support of that motion. In the Memorandum, filed on March 17, 2014, the Companies stated that if the Complaint were dismissed, KCTA would not be permanently deprived of an opportunity to question the pole attachment fees, as the Companies anticipated filing an application for an adjustment of their rates within 12 months of filing the Memorandum,

at which point KCTA could intervene. *See* Memorandum, p. 12. The present case represents the application for adjustment by KU referenced in the Memorandum. Accordingly, KCTA, in this motion, is simply seeking its “opportunity to intervene” to “challenge the reasonableness of the Companies’ pole attachment fees,” as anticipated by the Companies in the Memorandum. *See id.* Though the Commission has yet to make a final determination regarding case No. 2014-00025, KCTA’s intervention in the present case is wholly appropriate and will serve the cause of administrative economy.

The Commission has regularly approved KCTA’s intervention in ratemaking proceedings and pole attachment cases to protect its members’ interest in reasonable rates. Indeed, the Commission has regulated pole attachment rates since 1982, and KCTA has represented its members in virtually every pole attachment case that has arisen during that period.

KCTA’s intervention is in lieu of the individual intervention of its affected members. Consequently, KCTA’s intervention will promote the efficient progress of this proceeding by reducing the burden on other parties and on the Commission. It also will allow the interests of KCTA’s members to be represented without the burden of each being required to retain its own counsel and make its own filings.

KCTA seeks full intervenor status pursuant to 807 KAR 5:001 § 4 to allow it to fully participate as a party and to be served with documents related to KUC’s application. KCTA pledges to adhere to all Commission rules and procedures applicable to it as a party intervenor. The undersigned attorneys are authorized to represent KCTA in this proceeding and to take service of all documents.

WHEREFORE, KCTA moves for full intervention in the above proceeding.

Respectfully submitted,

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