

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA )  
GAS OF KENTUCKY, INC. FOR AN ) CASE NO. 2016-00162  
ADJUSTMENT OF RATES )

**COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON,  
HARRISON, AND NICHOLAS COUNTIES, INC.'S MOTION TO INTERVENE**

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Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 4(11) moves that it be granted leave to intervene in this matter and that it be granted full intervention.

In this matter the Commission will examine the request of Columbia Gas of Kentucky, Inc. for an adjustment of rates. A rate increase will have a significant impact on persons with low-income in the Columbia Gas of Kentucky, Inc. service territory.

CAC, whose address is P.O. Box 11610, Lexington, KY 40576, is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents in Columbia Gas of Kentucky, Inc.'s service territory. CAC regularly partners with Columbia Gas of Kentucky, Inc. and other utilities in programs to assist low income customers.

CAC has participated as a party in numerous other rate cases with the applicant and other utilities, including the applicant's most recent rate case. In those cases, CAC has advocated for lower rates and programs that provide assistance for low income customers.

CAC has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. CAC's interests are not adequately represented by the other parties to this proceeding. No other party's interest in this proceeding is

the low-income citizens of the Columbia Gas of Kentucky, Inc. service territory. CAC will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

CAC expects to present the testimony of Malcolm J. Ratchford, and may choose to present testimony of other witnesses not yet identified.

WHEREFORE, CAC requests that it be granted leave for full intervention and that it be certified as a full party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross-examine witnesses, and be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties or orders of the Commission.

Respectfully submitted,



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COUNSEL FOR CAC

## CERTIFICATE OF SERVICE

I hereby certify that CAC's June 1, 2016 electronic filing is a true and accurate copy of CAC's Motion to Intervene and cover letter to be filed in paper medium; that the electronic filing has been transmitted to the Commission on June 1, 2016; that an original and one copy of the filing will be delivered to the Commission on June 1, 2016; that there are currently no parties excused from participation by electronic service; and that, on June 1, 2016, electronic mail notification of the electronic filing is provided to the following:

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