

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BIG RIVERS)	
ELECTRIC CORPORATION FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY TO CONSTRUCT A 161 KV)	2022-00012
TRANSMISSION LINE IN HENDERSON)	
COUNT, KENTUCKY)	

Motion to Intervene

Comes, Sandra Freeburger, a licensed practicing attorney admitted to practice in the courts of Kentucky, on behalf of Neal Greenwell Farmland LLC and moves the Commission to allow the intervention of her client in this case.

Please consider the following information relevant to the proposed party:

1. The movant's full name and mailing address:

Neal Greenwell Farmland LLC
925 State Route 948
Morganfield KY 42437

2. Interest of movant in this case:

Neal Greenwell Farmland LLC has an interest in this case because it owns farm land which will be affected by the requested transmission line, and possibly, by related switching stations.

3. Effect of intervention and likely presentation of issues or facts that will assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings:

Given the unique nature of this parcel of real property, information which the movant can supply will assist the Commission in considering the application which is before it.

The movant is prepared to comply with the existing scheduling order which was entered on February 21, 2022, so there will be no undue complication or disruption to these proceedings, if this motion to intervene is granted.

The filing of this motion is timely. Unless this intervention is granted the interest of the movant, arising out of its ownership of affected real property, will not be otherwise adequately represented.

The Commission has jurisdiction over this matter, pursuant to K.R.S. 278.040(2), since it relates to the service of a utility, namely Big Rivers Electric Corporation.

For the reasons set forth above, the Commission is moved to grant this motion to intervene and to provide any further notifications to the attorney for the movant at her address shown below.

Respectfully submitted,

/s/ Sandra D. Freeburger

Sandra D. Freeburger

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Counsel for Neal Greenwell Farmland LLC

Proof of Filing and Certificate of Service

Please take note that this pleading was filed electronically with the Public Service Commission and a true and correct copy of said electronic filing and was served upon the following by first class U. S. Mail on March 2, 2022:

Case No. 2022-00012

Big Rivers Corporation
201 Third Street
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Henderson, KY 42420

Roger Hickman
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/s/ Sandra D. Freeburger
Sandra D. Freeburger