

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 Cypress Flats Land Company 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:

Cypress Flats Land Company LLC  
4135 State Route 141 North  
Uniontown KY 42461

2. Interest of movant in this case:

Cypress Flats Land Company 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 Cypress Flats Land Company 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  
P O Box 24  
Henderson, KY 42420

Roger Hickman  
Big Rivers Electric Corporation  
201 Third Street  
P O Box 24  
Henderson, KY 42420

Sentia Santana  
Big Rivers Corporation  
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/s/ Sandra D. Freeburger  
Sandra D. Freeburger