

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

In The Matter Of:

ELECTRONIC TARIFF FILING OF THE CITY OF LANCASTER)		
TO INCREASE THE WHOLESALE RATE CHARGED TO)		CASE NO.
THE GARRARD COUNTY WATER ASSOCIATION)		2023-00424

**GARRARD COUNTY WATER ASSOCIATION’S
MOTION TO INTERVENE**

Comes Garrard County Water Association, Inc. (“GCWA”), by and through counsel, pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and other relevant authority, and hereby moves the Kentucky Public Service Commission (“Commission”) for an order granting it full intervenor status in this proceeding. In support of this motion GCWA states as follows:

1. The Commission’s regulations, at 807 KAR 5:001, Section 4(11)(a)(1), require that a person requesting leave to intervene as a party to a Commission case, must by timely motion, state his or her interest in the case and how intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

2. The Commission’s regulations, at 807 KAR 5:001, Section 4(11)(b), provide that the Commission shall grant leave to intervene if it finds that the movant has made a timely motion for intervention, and has a special interest in the case that is not otherwise adequately represented or that the intervention is likely to present issues or develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

3. GCWA is a non-profit water association of Garrard County, created, incorporated and existing under the provisions of Chapter 273 of the Kentucky Revised Statutes. GCWA's Articles of Incorporation were filed with the Kentucky Secretary of State on February 4, 1970. GCWA is currently in good standing with the Kentucky Secretary of State. GCWA is now, and has been since its inception, regulated by the Commission, and all records and proceedings of the Commission with reference to GCWA are incorporated in this Application by reference.

4. A general description of GCWA's system property, together with a statement of the original cost, is contained in GCWA's Annual Report for 2022 filed with the Commission on March 30, 2023. The Annual Report is incorporated herein by reference.

5. The mailing address of GCWA is as follows: Garrard County Water Association, Inc. c/o Mr. Sean Smith, General Manager P.O. Box 670 Lancaster, Kentucky 40444; Telephone: (859) 792-4501 Fax: (859) 792-1671.

6. Should intervention be granted, GCWA certifies that it waives any right to service of Commission Orders by U.S. mail, and it possesses the facilities to receive electronic submissions, and copies of all pleadings, requests, orders, notices, and other documents in this case should be electronically sent to:

Mr. Sean Smith, General Manager: Email: ssmith@garrardwater.com, and

L. Allyson Honaker: Email: allyson@hloky.com; and Brittany Hayes Koenig: Email: brittany@hloky.com; attorneys duly licensed to practice law in the Commonwealth of Kentucky and entering their appearance on behalf of GCWA.

7. The city of Lancaster's tariff, which is the subject of this case is for wholesale water service to GCWA and is intended to directly impact GCWA and its

customers, as GCWA purchases water from the city of Lancaster on a wholesale basis. GCWA is the largest customer of the city of Lancaster and accounts for a majority of the water sales of the city of Lancaster. The wholesale rate increase to GCWA proposed by the city of Lancaster in this proceeding will be passed on to the customers of GCWA.

8. GCWA's motion to intervene is timely pursuant to the Commission's January 5, 2024 procedural Order.

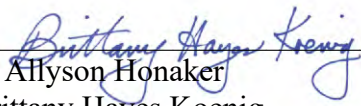
9. GCWA has a special interest in this case as described above. Moreover, that interest cannot and will not be adequately represented by any existing party, including the Kentucky Attorney General, since his statutory duty to represent the interests of consumers under KRS 367.150(8), relates almost exclusively to residential customers. GCWA's interest principally resides in its status as a wholesale customer of the city of Lancaster.

10. GCWA's intervention would not unduly complicate or disrupt the proceedings. To the contrary, GCWA's intervention is likely to present issues or develop facts that will assist the Commission in fully considering vital case issues.

WHEREFORE, GCWA respectfully requests that it be granted full intervenor status in this proceeding.

This 10th day of January, 2024.

Respectfully Submitted,



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*Counsel for Garrard County Water
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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Garrard County Water Association, Inc.'s Motion to Intervene is being electronically transmitted to the Commission on January 10, 2024; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020- 00085, no hard copies of this filing will be made.



Counsel for Garrard County Water Association, Inc