

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC INVESTIGATION)	
INTO FARMDALE WATER DISTRICT TO)	
DETERMINE THE FEASIBILITY OF MERGER WITH)	CASE NO.
A PROXIMATE UTILITY PURSUANT TO KRS 74.361)	2024-00202
OR ABANDONMENT PURSUANT TO)	
KRS 278.020(6) AND KRS 278.021)	

**MOTION TO INTERVENE ON BEHALF OF
THE ELECTRIC AND WATER PLANT BOARD OF THE CITY OF FRANKFORT, KY**

Pursuant to the Kentucky Public Service Commission’s (“Commission”) Order dated September 4, 2024 in this matter and K.R.S. 278.310 and 807 K.A.R. 5:001 § 4(11), The Electric and Water Plant Board of the City of Frankfort, KY (“FPB”) respectfully requests that the Commission grant it full intervenor status in this matter.

In its Order, the Commission explained that “any person requesting to intervene in a Commission proceeding must state with specificity the person’s special interest that is not otherwise adequately represented, or the issues and facts that the person will present that will assist the Commission in fully considering the matter.” September 4, 2024 Order at 8.

In support of its Motion FPB states as follows:

1. FPB has served Farmdale Water District (“Farmdale”) since the 1960’s and currently serves Farmdale pursuant to its November 12, 2014 wholesale water tariff. Farmdale is an important wholesale customer for FPB. Consequently, the merger or abandonment of Farmdale affects FPB directly such that FPB has a special interest that cannot be adequately represented by any other party.

2. FPB's participation in this matter will not unduly complicate or disrupt the proceedings and no entity or person will be prejudiced if FPB is allowed to intervene.

3. FPB can present issues and develop facts that will assist the Commission in the evaluation of this matter. FPB staff and management possess the expertise, proximity and willingness to assist Farmdale. For example, on October 1, 2024, FPB staff met with Farmdale's management and Board to discuss a variety of operational issues and how FPB might assist Farmdale moving forward.

FPB is currently assisting Farmdale with a relocation project on South Benson Road. Moreover, FPB may be able to leverage its AMI system to assist Farmdale with metering and billing. FPB and Farmdale are also developing a mutual aid agreement that will encompass other items such as meter changeovers and assistance with grant applications. Finally, Farmdale's current Board Chair is a retired FPB employee so there is a deep understanding of how the FPB and Farmdale systems interact and interconnect with one another.

4. FPB certifies that it possesses the facilities to receive electronic transmissions and states that copies of all pleadings, requests, orders, notices, and all other documents in this matter should be electronically sent to the attorney authorized to represent FPB in this matter and accept service of any such documents at the following address:

Frankfort Plant Board
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5. FPB's Motion is timely filed prior to November 8, 2024 as set forth in Appendix A to the Commission's September 4, 2024 Order.

WHEREFORE, FPB respectfully requests that it be granted full intervenor status in this matter.

Respectfully Submitted,

Hance Price

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This the 30th day of Oct., 2024

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was submitted electronically to the Public Service Commission and further certify that this document was sent by electronic mail to the following parties of record on Oct. 30, 2024, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

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