



Office of the Mayor

Monday, June, 15, 2015

Brian U. Ray, Executive Secretary
Mississippi Public Service Commission
501 North West Street Suite 201-A
Jackson, MS 39201

Re: Mississippi Power Docket No. 2015-UN-80 Notice of Intent of
Mississippi Power Company for a Change in Rates Related to the Kemper
County IGGC Project.

Dear Mr. Ray:

Please file the City of Biloxi's enclosed Motion to Intervene in the
referenced case.

I also enclosed 12 copies of the Motion.

Sincerely,

A handwritten signature in cursive script that reads "Gerald Blessey". The signature is written in black ink and is positioned above the printed name and title.

Gerald Blessey
City Attorney

GB/mw

cc. with enclosures

Mayor Andrew "FoFo" Gilich
Ben H. Stone, Esq.
Michael Adelman, Esq.

140 Lameuse St.
P. O. Box 429
Biloxi, MS 39533
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Visit online at
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**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSISSIPPI**

MISSISSIPPI POWER COMPANY

DOCKET NO.: 2015-UN-80

**IN RE: NOTICE OF INTENT OF MISSISSIPPI POWER
COMPANY FOR A CHANGE IN RATES RELATED TO
THE KEMPER COUNTY IGCC PROJECT**

MOTION TO INTERVENE

COMES NOW City of Biloxi, Mississippi by and through its City Attorney, Gerald Blessey, and, acting pursuant to Public Utilities Rule of Practice and Procedure 6.121, hereby files this Motion to Intervene in the above-styled proceedings, in support of which this Movant respectfully offers the following:

1. The City of Biloxi, Mississippi, (“Biloxi”) is a municipal corporation organized and existing under the laws of the State of Mississippi, with its principal place of business at City Hall, 140 Lameuse Street, Biloxi, Mississippi 39530.
2. Biloxi is a customer of Mississippi Power Company (“MPC”) at numerous locations, and the majority of the commercial enterprises and residents of Biloxi are also customers.
3. Biloxi and its citizens and taxpayers have a substantial interest relating to the property, transaction or outcome of this proceeding and is so situated that the disposition of the proceeding may as a practical matter impair or impede their ability to protect that interest. Specifically, the primary electric service for Biloxi’s City

Hall and most of its municipal buildings and streetlights is provided by MPC. Likewise, most of the commercial and residential users of electric service in Biloxi are MPC customers.

4. The MPC rate change(s) that are the subject of this proceeding stand to have a significant economic impact on Biloxi, its businesses, residents and all other ratepayers.
5. As an MPC ratepayer, Biloxi requests leave to intervene as a full party of record with all attendant rights, including but not limited to the right to present testimony and exhibits, file motions, present argument, and cross-examine witnesses. Biloxi's rights and interests in this matter will not be adequately represented by any other party, and its participation will not unduly delay these proceedings.

WHEREFORE, PREMISES CONSIDERED, the City of Biloxi, Mississippi respectfully requests that the Commission enter an Order granting this Motion and allowing Biloxi to become a full party of record represented by its City Attorney, Gerald Blessey.

Respectfully submitted, this the 15th day of June, 2015.

CITY OF BILOXI, MISSISSIPPI

By: 
GERALD BLESSEY

Gerald Blessey (MB No. 3591)
City Attorney
140 Lameuse Street (39530)
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blesseylaw@me.com

AFFIDAVIT


COMES NOW, Gerald Blessey, who after being duly sworn, certifies that he is the City Attorney for the City of Biloxi and that the facts and matters set forth in the above and forgoing Motion are true and correct as therein stated.



Gerald Blessey

SWORN TO AND SUBSCRIBED BEFORE ME on this the 15th day of June, 2015.





NOTARY PUBLIC

CERTIFICATE OF SERVICE

I, Gerald Blessey, City Attorney for the City of Biloxi herein, do hereby certify that I have this day mailed, by United States Mail, postage fully prepaid, an original and twelve (12) copies of the above and forgoing **MOTION TO INTERVENE** on:

Brian U. Ray, Executive Secretary
Mississippi Public Service Commission
501 North West Street
Suite 201-A
Jackson, MS 39201

And a true and correct copy on:

Ben H. Stone, Esq.
Balch & Bingham, L.L.P.
PO Box 130
Gulfport, MS 39201

Michael Adelman, Esq.
Adelman & Steen, L.L.P.
PO Box 368
Hattiesburg, MS 39403-0368

THIS the 15th day of June, 2015.


GERALD BLESSEY