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Via Overnight Mail

December 20, 2012

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: **Case No. 2012-00578**

RECEIVED

DEC 21 2012

PUBLIC SERVICE
COMMISSION

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS for filing in the above-referenced docket.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Attachment

cc: Certificate of Service
Quang Nyugen, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy via electronic mail (when available) and regular U.S. Mail to all parties on this 20th day of December, 2012



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RANIE WOHNHAS
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KENTUCKY POWER COMPANY
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P. O. BOX 5190
FRANKFORT, KY 40602

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

IN THE MATTER OF: THE APPLICATION OF KENTUCKY POWER :
COMPANY FOR (1) A CERTIFICATE OF PUBLIC CONVENIENCE AND :
NECESSITY AUTHORIZING THE TRANSFER TO THE COMPANY OF AN :
UNDIVIDED FIFTY PERCENT INTEREST IN THE MITCHELL :
GENERATING STATION AND ASSOCIATED ASSETS; (2) APPROVAL OF :
THE ASSUMPTION BY KENTUCKY POWER COMPANY OF CERTAIN :
LIABILITIES IN CONNECTION WITH THE TRANSFER OF THE MITCHELL :
GENERATING STATION; (3) DECLARATORY RULINGS; (4) DEFERRAL :
OF COSTS INCURRED IN CONNECTION WITH THE COMPANY'S :
EFFORTS TO MEET FEDERAL CLEAN AIR ACT AND RELATED :
REQUIREMENTS; AND (5) FOR ALL OTHER REQUIRED APPROVALS :
AND RELIEF :

Case No. 2012-00578

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PUBLIC SERVICE
COMMISSION

**PETITION TO INTERVENE OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Kentucky Industrial Utility Customers, Inc. ("KIUC") requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

1. KIUC is an association of the largest electric and gas public utility customers in Kentucky. The purpose of KIUC is to represent the industrial viewpoint on energy and utility issues before this Commission and before all other appropriate governmental bodies. The members of KIUC who will participate herein are: Air Liquide Large Industries U.S. LP, AK Steel Corporation, Air Products & Chemicals, Inc., EQT Corporation and Catlettsburg Refining LLC, a subsidiary of Marathon Petroleum LP. KIUC will supplement the names of additional intervenors when necessary.
2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC for electricity. Electricity represents a significant cost of doing business for KIUC. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq.
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Jody Kyler Cohn, Esq.
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3. The position of KIUC cannot be adequately represented by any existing party. KIUC intends to play a constructive role in the Commission's decision-making process herein and KIUC's participation will not unduly prejudice any party.

WHEREFORE, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,



Michael L. Kurtz, Esq.
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Jody Kyler Cohn, Esq.
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**COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY
CUSTOMERS, INC.**

December 20, 2012