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**DEC 02 2013**

**PUBLIC SERVICE  
COMMISSION**

**Via Overnight Mail**

November 27, 2013

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

**Re: Case No. 2013-00413**

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC's ("KIUC") AMENDED PETITION TO INTERVENE for filing in the above-referenced matter. In its Amended Petition to Intervene, KIUC has replaced the citation to 807 KAR 5:001, Section 3(8) that appeared in KIUC's November 25, 2013 Petition to Intervene with a citation to 807 KAR 5:001, Section 4(11). KIUC has also added Jody Kyler Cohn as additional co-counsel.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place these documents on 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.  
Richard Raff, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by electronic mail (when available) and by regular, U.S. mail, unless other noted, this 27<sup>TH</sup> day of November, 2013 to the following:



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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF: JOINT APPLICATION OF KENERGY :  
CORP. AND BIG RIVERS ELECTRIC CORPORATION FOR : Case No. 2013-00413  
APPROVAL OF CONTRACTS AND FOR A DECLARATORY :  
ORDER :

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

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Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 4(11), 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 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.
2. The members of KIUC who purchase electricity from Big Rivers Electric Corporation ("Big Rivers") through Kenergy Corp. who will participate herein are: Domtar Paper Co., LLC, Kimberly Clark Corporation and Aleris International, Inc.
3. All KIUC member companies have a similar interest in ensuring that the rates charged by Big Rivers to Kenergy for pass-through to retail consumers are just and reasonable.
4. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC members for electricity. Electricity represents a significant cost of doing business for KIUC members. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.  
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5. 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.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

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**COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY  
CUSTOMERS, INC.**

November 27, 2013