

**BOEHM, KURTZ & LOWRY**

ATTORNEYS AT LAW  
36 EAST SEVENTH STREET  
SUITE 1510  
CINCINNATI, OHIO 45202  
TELEPHONE (513) 421-2255  
TELECOPIER (513) 421-2764

RECEIVED

MAY 6 2005

PUBLIC SERVICE  
COMMISSION

Via Overnight Mail

May 5, 2005

Beth A. O'Donnell, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

Re: Case No. 2005-00162

Dear Ms. O'Donnell:

Please find enclosed the original and twelve (12) copies each of the Motion to Intervene of Kentucky Industrial Utility Customers, Inc. in the above-referenced matter.

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

Very Truly Yours,



Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

**CERTIFICATE OF SERVICE**


I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 5<sup>th</sup> day of May, 2005.

Kent W. Blake  
Director State Regulations and Rates  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010  
[kent.blake@lgeenergy.com](mailto:kent.blake@lgeenergy.com)

Honorable Elizabeth L. Cocanougher  
Senior Corporate Attorney  
Kentucky Utilities Company  
c/o Louisville Gas & Electric Co.  
P. O. Box 32010  
Louisville, KY 40232-2010

Honorable Kendrick R. Riggs  
Attorney at Law  
Ogden, Newell & Welch, PLLC  
1700 Citizens Plaza  
500 West Jefferson Street  
Louisville, KY 40202  
[kriggs@ogdenlaw.com](mailto:kriggs@ogdenlaw.com)

John Wolfram  
Manager, Regulatory Affairs  
Kentucky Utilities Company  
c/o Louisville Gas & Electric Co.  
P. O. Box 32010  
Louisville, KY 40232-2010

  
Michael L. Kurtz, Esq.

RECEIVED

MAY 6 2005

PUBLIC SERVICE  
COMMISSION

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

In The Matter Of: The 2005 Joint Integrated Resource Plan of Louisville :  
Gas & Electric Company and Kentucky Utilities Company : Case No. 2005-00162

---

**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 purchase electricity from Kentucky Utilities Company ("KU") and Louisville Gas & Electric Company ("LG&E") and who will participate herein are: Carbide Industries LLC., E.I. DuPont de Nemours & Company, Ford Motor Company, Kosmos Cement Company, Rohm & Haas Company, General Electric-Appliance Park, Lexmark International, Inc., Square D. Company, Clopay Plastic Products Company, Inc., Dow Corning Corporation, Toyota Motor Manufacturing, NA, and Westvaco. KIUC will supplement its Petition with the names of additional participating members as this information becomes known.

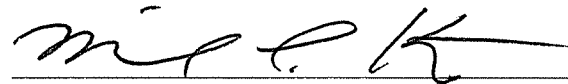
2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC for electricity. Electricity represents a significant cost of doing business for KIUC. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
Ph: 513-421-2255 Fax: 513-421-2764  
E-Mail: [KIUC@BKLLawfirm.com](mailto:KIUC@BKLLawfirm.com)

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,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [KIUC@BKLLawfirm.com](mailto:KIUC@BKLLawfirm.com)

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

July 18, 2003