

**BOEHM, KURTZ & LOWRY**

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

**RECEIVED**

APR 18 2006

PUBLIC SERVICE  
COMMISSION

**VIA OVERNIGHT MAIL**

April 17, 2006

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

**Re: Administrative Case No. 2006-00045**

Dear Ms. O'Donnell:

Please find enclosed the original and twelve copies of the Petition to Intervene of the Kentucky Industrial Utility Customers, Inc., filed in the above-referenced matter.

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

Very Truly Yours,



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

MLKkew  
Attachment  
cc: Certificate of Service

### 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 17<sup>th</sup> day of April, 2006.

Allen Anderson  
South Kentucky R.E.C.C.  
P. O. Box 910  
925-929 N. Main Street  
Somerset, KY 42502-0910

Mark A. Bailey  
Kenergy Corp.  
3111 Fairview Drive  
P. O. Box 1389  
Owensboro, KY 42302

Michael S. Beer  
VP - Rates & Regulatory  
Kentucky Utilities Company  
c/o Louisville Gas & Electric Co.  
P. O. Box 32010  
Louisville, KY 40232-2010

Honorable Jason R. Bentley  
Attorney at Law  
McBrayer, McGinnis, Leslie  
& Kirkland PLLC  
305 Ann Street  
Suite 308  
Frankfort, KY 40601

Kent Blake  
Director- State Regulation and Rates  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

Dudley Bottom, Jr.  
Shelby Energy Cooperative, Inc.  
620 Old Finchville Road  
Shelbyville, KY 40065

Daniel W. Brewer  
Blue Grass Energy Cooperative Corp.  
P. O. Box 990  
1201 Lexington Road  
Nicholasville, KY 40340-0990

Jackie B. Browning  
Farmers R.E.C.C.  
504 South Broadway  
P. O. Box 1298  
Glasgow, KY 42141-1298

Sharon K. Carson  
Finance & Accounting Manager  
Jackson Energy Cooperative  
P. O. Box 307  
U. S. Highway 421S

McKee, KY 40447  
Honorable Elizabeth L. Cocanougher  
Senior Corporate Attorney  
Kentucky Utilities Company  
c/o Louisville Gas & Electric Co.  
P. O. Box 32010  
Louisville, KY 40232-2010

Lawrence W. Cook  
Assistant Attorney General  
Office of the Attorney General  
Utility & Rate Intervention Division  
1024 Capital Center Drive  
Suite 200  
Frankfort, KY 40601-8204

Michael H. Core  
Big Rivers Electric Corporation  
201 Third Street  
P. O. Box 24  
Henderson, KY 42420

Paul G. Embs  
Clark Energy Cooperative, Inc.  
P. O. Box 748  
2640 Ironworks Road  
Winchester, KY 40392-0748

Carol H. Fraley  
President and CEO  
Grayson R.E.C.C.  
109 Bagby Park  
Grayson, KY 41143

James B. Gainer  
Legal Division  
The Union Light, Heat and Power  
Company  
139 East Fourth Street  
Cincinnati, OH 45202

Ted Hampton  
Cumberland Valley Electric, Inc.  
Highway 25E, P. O. Box 440  
Gray, KY 40734

Larry Hicks  
Salt River Electric Cooperative  
Corp.  
111 West Brashear Avenue  
P. O. Box 609  
Bardstown, KY 40004

Kerry K. Howard  
Licking Valley R.E.C.C.  
P. O. Box 605  
271 Main Street  
West Liberty, KY 41472

James L. Jacobus  
Inter-County Energy Cooperative  
Corporation  
1009 Hustonville Road  
P. O. Box 87  
Danville, KY 40423-0087

Honorable Tyson A. Kamuf  
Attorney at Law  
Sullivan, Mountjoy, Stainback  
& Miller, PSC  
100 St. Ann Street  
P.O. Box 727  
Owensboro, KY 42302-0727

Honorable Lisa Kilkelly  
Attorney at Law  
Legal Aid Society  
425 West Muhammad Ali Boulevard  
Louisville, KY 40202  
lkilkelly.laslou.org

Robert M. Marshall  
Owen Electric Cooperative, Inc.  
8205 Highway 127 North  
P. O. Box 400  
Owenton, KY 40359

Burns E. Mercer  
Meade County R.E.C.C.  
P. O. Box 489  
Brandenburg, KY 40108-0489

Michael L. Miller  
President & CEO  
Nolin R.E.C.C.  
411 Ring Road  
Elizabethtown, KY 42701-8701

Honorable James M. Miller  
Attorney at Law  
Sullivan, Mountjoy, Stainback  
& Miller, PSC  
100 St. Ann Street  
P.O. Box 727  
Owensboro, KY 42302-0727  
[jmiller@smsmlaw.com](mailto:jmiller@smsmlaw.com)

Timothy C. Mosher  
American Electric Power  
101A Enterprise Drive  
P. O. Box 5190  
Frankfort, KY 40602

Barry L. Myers  
Manager  
Taylor County R.E.C.C.  
100 West Main Street  
P. O. Box 100  
Campbellsville, KY 42719

G. Kelly Nuckols  
Jackson Purchase Energy Corporation  
2900 Irvin Cobb Drive  
P. O. Box 4030  
Paducah, KY 42002-4030

Anthony P. Overbey  
Fleming-Mason Energy Cooperative  
P. O. Box 328  
Flemingsburg, KY 41041

Honorable Mark R. Overstreet  
Attorney at Law  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KY 40602-0634  
[moverstreet@stites.com](mailto:moverstreet@stites.com)

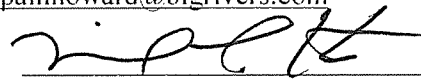
Roy M. Palk  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

Honorable Kendrick R. Riggs  
Stoll Keenon Ogden PLLC  
1700 PNC Plaza

500 West Jefferson Street  
Louisville, KY 40202  
[kendrick.riggs@skofirm.com](mailto:kendrick.riggs@skofirm.com)

Bobby D. Sexton  
President/General Manager  
Big Sandy R.E.C.C.  
504 11th Street  
Paintsville, KY 41240-1422

David A. Spainhoward  
Vice President  
Big Rivers Electric Corporation  
201 Third Street  
P. O. Box 24  
Henderson, KY 42420  
[dspainhoward@bigrivers.com](mailto:dspainhoward@bigrivers.com)



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Michael L. Kurtz, Esq.

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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APR 18 2006

PUBLIC SERVICE  
COMMISSION

In the Matter of:

Consideration Of The Requirements Of The Federal : Administrative Case No. 2006-00045  
Energy Policy Act Of 2005 Regarding Time Based :  
Metering, Demand Response, And Interconnection Service :

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PETITION TO INTERVENE OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

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

1. KIUC is a non-profit corporation comprised 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.
2. 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@BKLawfirm.com](mailto:KIUC@BKLawfirm.com)  
[dboehm@BKLawfirm.com](mailto:dboehm@BKLawfirm.com)  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.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

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

April 17, 2006