## BOEHM, KURTZ & LOWRY

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PUBLIC SERVICE

COMMISSION

April 5, 2007

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

Re: <u>Case No. 2006-00466</u>

Dear Ms. O'Donnell:

Via Overnight Mail

Please find enclosed the original and twelve (12) copies of the Petition to Intervene of KIUC in the above-referenced matter. 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.

**BOEHM, KURTZ & LOWRY** 

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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 first-class postage prepaid mail, to all parties on the 5<sup>th</sup> day of April, 2007.

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

Honorable John J. Scott Attorney at Law Whitlow & Scott 108 East Poplar Street P. O. Box 389 Elizabethtown, KY 42702

Honorable Larry Cook Honorable Dennis Howard Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq.

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

In The Matter Of:

**Application Of Nolin Rural Electric Cooperative Corporation For An Adjustment Of Rates** 

Case No. 2006-00466

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## 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 Nolin Rural Electric Cooperative Corporation ("Nolin") and who will participate herein are: AGC Automotive. 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:

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. **BOEHM, KURTZ & LOWRY** 36 E. Seventh Street, Suite 1510

Cincinnati, Ohio 45202 Ph: (513) 421-2255, Fax: (513) 421-2765

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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. Kurt J. Boehm, Esq.

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COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

April 5, 2007