WHITLOW & SCOTT

ATTORNEYS AT LAW 108 EAST POPLAR STREET P.O. BOX 389 **ELIZABETHTOWN, KENTUCKY 42702-0389**

JAMES T. WHITLOW JOHN J. SCOTT BENJAMIN J. HUMPHRIES TELEPHONE 270-765-2179 FAX 270-765-2180 April 13, 2007

LINCOLN SQUARE HODGENVILLE, KENTUCKY 42748 270-358-4344

Ms. Elizabeth O'Donnell **Executive Director** Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

RECEIVED APR 1 6 2007 PUBLIC SERVICE COMMISSION

Re: PSC Case No. 2006-00466

Dear Ms. O'Donnell:

On behalf of Nolin Rural Electric Cooperative Corporation, please find enclosed an original and 12 copies of a Response to the Petition to Intervene of KIUC in the above-styled matter. Please file this document in this case for us.

Very truly yours,

John J/Scott, Counsel for Nolin

Rural Electric Cooperative Corporation

JJS/rrd

Enclosures

APR 1 6 2007

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:	:
Application Of Nolin Rural Electric Cooperative	: Case No. 2006-00466
Corporation For An Adjustment Of Rates	:
	:

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

Comes Nolin Rural Electric Cooperative Corporation, by counsel, and in Response to the Petition to Intervene filed by Kentucky Industrial Utility Customers, Inc., states as follows:

- 1. Nolin RECC hereby objects to the Petition to Intervene because the Petition is filed on behalf of AGC Automotive, a member of KIUC, and there will be no rate change whatsoever to AGC Automotive in this rate case that has been filed. In fact, no rate change has been requested in this rate case for any Schedule Four Industrial rate members.
- 2. Since the member of KIUC will not be affected whatsoever by this rate case, Nolin RECC asserts that the proposed intervention

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by KIUC will only delay and burden the progress of this rate case and therefore, their Petition to Intervene should be denied.

Wherefore, Nolin Rural Electric Cooperative Corporation requests that the Petition filed on behalf of KIUC be denied.

Respectfully submitted, this 13th day of April, 2007.

JOHN J. SCOTX

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ATTORNEY FOR NOLIN RECC

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CERTIFICTE

This is to certify that a copy of the foregoing Response was this 13th day of April, 2007 mailed to the following:

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Boehm, Kurtz & Lowry 36 E. Seventh Street, Suite 1510 Cincinnati, Ohio 45202 Counsel for Kentucky Industrial Utility Customers, Inc.

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Hon. Larry Cook Hon. 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. Miller President & CEO Nolin R.E.C.C. 411 Ring Road Elizabethtown, Ky. 42701-8701

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