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### RECEIVED

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PUBLIC SERVICE COMMISSION

#### VIA OVERNIGHT MAIL

February 1, 2007

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

Re: <u>Case No. 2007-00008</u>

Dear Ms. O'Donnell:

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

David F. Boehm, 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 first-class postage prepaid mail to all parties on the 1<sup>st</sup> day of February, 2007.

Honorable Stephen B. Seiple Attorney at Law Columbia Gas of Kentucky, Inc. 200 Civic Center Drive P.O. Box 117 Columbus, OH 43216-0117 sseiple@nisource.com

David F. Boehm, Esq.

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of: : Case No. 2007-00008

:

Application Of Columbia Gas Of Kentucky, Inc.

For An Adjustment Of Gas Rates

:

# PETITION TO INTERVNE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Pursuant to 807 KAR 5:001 Sec. 3(8), Kentucky Industrial Utility Customers ("KIUC") hereby respectfully move this Commission for an Order permitting it to intervene and to be a party to the within proceeding, with full intervention status. In support of its Motion, KIUC states as follows:

- (1) KIUC is a group of large manufacturing companies located in the service area of Columbia Gas of Kentucky, Inc. ("Columbia Gas");
- (2) KIUC, as ratepayers of Columbia Gas, transport large amounts of gas under various Columbia Gas rates and tariffs;
- (3) This proceeding involves issues which could effect gas transportation costs and availability, capacity costs and availability and other questions of critical importance to KIUC companies;
- (4) Therefore, KIUC has a substantial interest in the fairness and reasonableness of the rates and charges proposed by Columbia Gas;

(5) Counsel for KIUC in this proceeding and upon whom all notices are to be served are:

David F. Boehm, Esq. Boehm, Kurtz, & Lowry 36 E. Seventh Street, Suite 1510 Cincinnati, Ohio 45202

Ph: 513-421-2255 Fax: 513-421-2764 E-Mail: dboehm@BKLlawfirm.com

WHEREFORE, KIUC prays that the Commission grant it full intervention status and make it party to the proceeding herein, allow it to appear by counsel for any and all purposes, and to receive filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties.

Respectfully submitted,

David F. Boehm, Esq.

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Counsel for Kentucky Industrial Utility Customers, Inc.

February 1, 2007