BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW 36 EAST SEVENTH STREET SUITE 2110 CINCINNATI, OHIO 45202 TELEPHONE (513) 421-2255 TELECOPIER (513) 421-2764

RECEIVED

FEB 1 6 2007

PUBLIC SERVICE COMMISSION

Via Overnight Mail

February 15, 2007

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

Re: <u>Case No. 2007-00067</u>

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,

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David F. Boehm, Esq. Michael L. Kurtz, Esq. BOEHM, KURTZ & LOWRY

MLKkew Attachment

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 15th day of February, 2007.

Rick Love Kamp Kentucky Utilities Company c/o Louisville Gas & Electric Co. P. O. Box 32010 Louisville, KY 40232-2010

Honorable Allyson K. Sturgeon E.ON U.S., LLC 220 West Main Street Louisville, KY 40202 <u>allyson.sturgeon@eon-us.com</u>

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David F. Boehm, Esq. Michael L. Kurtz, Esq.

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION RECEIVED

In The Matter Of:

Joint Application of Louisville Gas & Electric Company And Kentucky Utilities Company For Approval Of Their Proposed Green Energy Riders Case No. 2007-00067

FEB 1 6 2007 PUBLIC SERVICE COMMISSION

PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

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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 NewPage. 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: <u>mkurtz@BKLlawfirm.com</u> <u>kboehm@BKLlawfirm.com</u>

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: <u>mkurtz@BKLlawfirm.com</u> kboehm@BKLlawfirm.com

COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

February 15, 2007