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APR 30 2008

PUBLIC SERVICE

COMMISSION

Via Overnight Mail

April 28, 2008

Stephanie L. Stumbo, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: <u>Case No. 2008-00148</u>

Dear Ms. Stumbo:

Please find enclosed the original and twelve (12) copies each of the PETITION 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,

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

BOEHM, KURTZ & LOWRY

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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 28th day of April, 2008.

Rick E Lovekamp Manager - Regulatory Affairs E.ON U.S. Services, Inc. 220 West Main Street Louisville, KY 40202

Honorable Allyson K Sturgeon Attorney at Law E.ON U.S. Services, Inc. 220 West Main Street Louisville, KY 40202

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

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of The 2008 Joint Integrated :

Resource Plan Of Louisville Gas And Electric : Case No. 2008-00148

Company And Kentucky Utilities Company :

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 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, Cemex, Rohm & Haas Company, General Electric-Appliance Park, Lexmark International, Inc., Square D Company, Clopay Plastic Products Company, Inc., Domtar Paper Co., LLC, Dow Corning Corporation, Toyota Motor Manufacturing, NA, and MeadWestvaco. 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: dboehm@bkllawfirm.com

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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,

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

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COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

April 28, 2008