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June 16, 2014

HAND DELIVERY

Mr. Jeff R. Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

David C. Brown
(502) 681-0421
(502) 779-8251 FAX
dbrown@stites.com

RECEIVE

JUN 16 2014

PUBLIC SERVICE
COMMISSION

**Re: The 2014 Resource Plan of Big Rivers Electric Corporation
Case No. 2014-00166**

Dear Mr. Derouen:

Enclosed for filing in the above matter are an original and ten copies of the Motion of Century Aluminum of Kentucky General Partnership and Century Aluminum Sebree LLC ("Century") for Full Intervention in the above docket.

Also enclosed for filing are an original and ten copies of the Motion by Century for the admission *pro hac vice* of Robert A Weishaar, Jr. as counsel for Century in this docket

Very truly yours,



David C. Brown

DCB

Enclosures

cc: James M. Miller
Tyson Kamuf
Michael L. Kurtz
Kurt J. Boehm
Jennifer Black Hans

**COMMONWEALTH OF KENTUCKY
BEFORE THE
PUBLIC SERVICE COMMISSION OF KENTUCKY**

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JUN 16

**PUBLIC SER
COMMISS**

In the Matter of:

THE 2014 RESOURCE PLAN OF)	
BIG RIVERS ELECTRIC)	Case No. 2014-00166
CORPORATION)	

**PETITION FOR FULL INTERVENTION OF
CENTURY ALUMINUM OF KENTUCKY GENERAL PARTNERSHIP AND
CENTURY ALUMINUM SEBREE LLC**

Pursuant to KRS §278.310 and 807 KAR 5:001 Section 3(8), Century Aluminum of Kentucky General Partnership ("Century Hawesville") and Century Aluminum Sebree LLC ("Century Sebree") (collectively, "Century") request that they be granted full intervenor status in the above captioned proceeding and state in support thereof as follows:

1. Century Hawesville owns and operates an aluminum reduction facility in Hawesville, Kentucky. Century Hawesville purchases from Kenergy Corp. ("Kenergy") electric generation that has been purchased at Century Hawesville's direction by Big Rivers Electric Corp. ("Big Rivers") in wholesale power markets. The series of transactions facilitating Century Hawesville's electric power purchasing arrangement were approved in their entirety by the Kentucky Public Service Commission ("Commission") on August 14, 2013, in Docket No. 2013-00221.

2. Century Sebree owns and operates an aluminum reduction facility in Sebree, Kentucky. Century Sebree purchases from Kenergy electric generation that has been purchased

at Century Sebree's direction by Big Rivers in wholesale power markets. The series of transactions facilitating Century Sebree's electric power purchasing arrangement were approved in their entirety by the Commission on January 30, 2014, in Docket No. 2013-00413.

3. Century has a substantial interest in actions Big Rivers may take going forward that may impact Century as a transmission customer and as a potential purchaser of the Coleman Generating Station. Century's interests include:

- In Case No. 2013-00221 in which the Commission approved the new contracts among Big Rivers, Kenergy and Century, the record shows that the closure of, or the suspension of operations at, the Coleman Generating Station imposed a significant risk that the transmission system could not reliably deliver the full amount of power needed by the Hawesville smelter. Coleman is now closed (or suspended) and even with the Special Protective System in place, Hawesville's operation remains at significant risk.
- Also in Case No. 2013-00221, and again in Case No. 2013-00413 involving the Sebree smelter, Big Rivers testified that it would not perform live-line transmission maintenance, even though the Commission found it was as safe as maintenance on de-energized lines. This decision increased the risk that the Hawesville smelter would be curtailed and the associated transmission revenues lost, thereby failing to further mitigate the impact on other customers.
- Big Rivers' resource plans will have a direct and substantial impact on the reliability and cost of transmission service to both Century smelters.

Electric service represents a significant cost of doing business for Century. The matters being addressed and decided by the Commission in this proceeding will have a significant impact on Century. Therefore, Century has a special interest in this proceeding that cannot be adequately

represented by any other entity. Century intends to play a constructive role in the Commission's decision making process herein and its participation will not unduly prejudice any party.

4. The attorneys for Century authorized to represent it in this proceeding and to take service of all documents are:

David C. Brown
Stites & Harbison PLLC
400 W. Market Street, Suite 1800
Louisville, Kentucky 40202-3352
Phone: (502) 681-0421
Email: dbrown@stites.com

Robert A. Weishaar, Jr.
McNees Wallace & Nurick LLC
777 North Capitol Street, NE, Suite 401
Washington, DC 20002-4292
Phone: (202) 898-5700
Email: rweishaa@mwn.com
(motion for admission *pro hac vice* forthcoming)

WHEREFORE, Century Aluminum of Kentucky General Partnership and Century Aluminum Sebree LLC request that they be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,


David C. Brown
STITES & HARBISON PLLC
400 W. Market Street, Suite 1800
Louisville, KY 40202-3352

Counsel for Century Aluminum of Kentucky
General Partnership and Century Aluminum Sebree
LLC

June 16, 2014

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via United

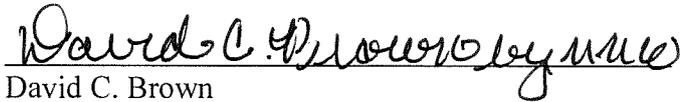
States Postal Service, First Class Mail, postage prepaid, upon:

James M. Miller
Tyson Kamuf
Sullivan Mountjoy Stainback & Miller
100 St. Ann Street
Owensboro, Kentucky 42302

Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
Boehm Kurtz & Lowry
Suite 2110
36 East Seventh Street
Cincinnati, Ohio 45202

Jennifer Black Hans
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankford, Kentucky 40601

on this the 16th day of June, 2014.



David C. Brown
Counsel for:
Century Aluminum of Kentucky General
Partnership
and
Century Aluminum Sebree LLC

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

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In the Matter of:

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The 2014 Resource Plan of
Big Rivers Electric Corporation

CASE NO. 2014-00166

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MOTION FOR ADMISSION *PRO HAC VICE*

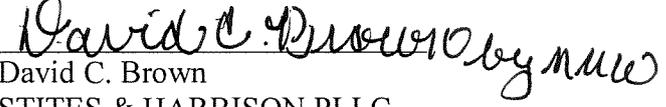
Intervenors Century Aluminum of Kentucky General Partnership and Century Aluminum Sebree LLC, by and through counsel, hereby move for the admission *pro hac vice* of Robert A. Weishaar, Jr., as counsel for Century. Robert A. Weishaar, Jr.'s address is 777 North Capitol Street, NE, Suite 401, Washington, DC 20002-4292.

Attached to this Motion for Admission Pro Hac Vice is the Kentucky Bar Association Out-of-State Certification Form certifying that Robert A. Weishaar, Jr., is a member in good standing of the bars of the Commonwealth of Pennsylvania (Bar No. 74678) and the District of Columbia (Bar No. 475818), and is not under suspension or disbarment from any bar.

WHEREFORE, the Commission is hereby requested to enter an Order permitting Robert

A. Weishaar, Jr. to appear *pro hac vice* in this proceeding.

Respectfully submitted,


David C. Brown
STITES & HARBISON PLLC
400 W. Market Street, Suite 1800
Louisville, KY 40202-3352
dbrown@stites.com

Counsel to Century Aluminum of Kentucky
General Partnership
and
Century Aluminum Sebree LLC

Dated: June 16, 2014

CERTIFICATE OF SERVICE

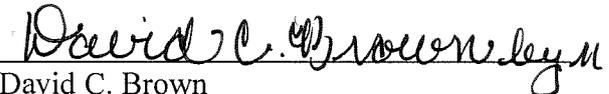
I hereby certify that a true and accurate copy of the foregoing was served via United States Postal Service, First Class Mail, postage prepaid, upon:

James M. Miller
Tyson Kamuf
Sullivan Mountjoy Stainback & Miller
100 St. Ann Street
Owensboro, Kentucky 42302

Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
Boehm Kurtz & Lowry
Suite 2110
36 East Seventh Street
Cincinnati, Ohio 45202

Jennifer Black Hans
Assistant Attorney General
Office of the Attorney General
1024 Capital Center Drive
Suite 200
Frankford, Kentucky 40601

on this the 16th day of June, 2014.


David C. Brown
Counsel for:
Century Aluminum of Kentucky
General Partnership
and
Century Aluminum Sebree LLC

KENTUCKY BAR ASSOCIATION

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KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

COURT Franklin County Circuit Court

CASE NO. 2014-00166

SCR 3.030 Membership, practice by nonmembers and classes of membership

(2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$270.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee.

The Kentucky Bar Association certifies that Robert A. Weishaar, Jr. has paid the per-case fee of \$270.00 in the above referenced case as required in SCR 3.030(2).

A handwritten signature in cursive script, reading 'Michele M. Pogrotsky', written over a horizontal line.

Michele M. Pogrotsky, Deputy Registrar