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PUBLIC SERVICE
COMMISSION

VIA OVERNIGHT MAIL

July 6, 2015

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2015-001213

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the MOTION TO INTERVENE OF NUCOR STEEL GALLATIN for filing in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, 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 6th day of July, 2015.



Michael L. Kurtz, Esq.

Honorable James M Crawford
Crawford & Baxter, P.S.C.
523 Highland Avenue
P. O. Box 353
Carrollton, KENTUCKY 41008

Owen Electric Cooperative, Inc.
8205 Highway 127 North
P. O. Box 400
Owenton, KY 40359

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF: APPLICATION OF OWEN ELECTRIC :
COOPERATIVE INC. FOR A CERTIFICATE OF PUBLIC : Case No. 2015-00213
CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION :
OF A TWO MEGAWATT DISTRIBUTED GENERATION :
FACILITY IN OWEN COUNTY, KENTUCKY :

MOTION TO INTERVENE OF
NUCOR STEEL GALLATIN

Pursuant to K.R.S. §278.310 and 807 KAR 5:001, Section 4(11), Nucor Steel Gallatin ("Nucor") requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

1. Nucor is the largest end use customer located in the Owen Electric Cooperative ("Owen") service territory. Owen is in turn provided with generation and transmission service by East Kentucky Power Cooperative, Inc. ("EKPC").
2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by Nucor for electricity. Electricity represents a significant cost of doing business for Nucor. The attorneys for Nucor authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq.
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3. The position of Nucor cannot be adequately represented by any existing party. Nucor intends to play a constructive role in the Commission's decision-making process herein and Nucor's participation will not unduly prejudice any party.

WHEREFORE, Nucor Steel Gallatin requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,



Michael L. Kurtz, Esq.

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COUNSEL FOR NUCOR STEEL GALLATIN

July 6, 2015