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VIA OVERNIGHT MAIL

July 28, 2015

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PUBLIC SERVICE
COMMISSION

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

Re: Case No. 2015-00267

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 28th day of July, 2015.



Michael L. Kurtz, Esq.

East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P. O. Box 707
Winchester, KY 40392-0707

David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

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

IN THE MATTER OF: APPLICATION OF EAST KENTUCKY :
POWER COOPERATIVE, INC. FOR APPROVAL OF THE : Case No. 2015-00267
ACQUISITION OF EXISTING COMBUSTION TURBINE :
FACILITIES FROM BLUEGRASS GENERATION COMPANY, :
LLC AT THE BLUEGRASS GENERATING STATION IN :
LAGRANGE, OLDHAM COUNTY, KENTUCKY AND FOR :
APPROVAL OF THE ASSUMPTION OF CERTAIN EVIDENCES :
OF INDEBTEDNESS :

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COMMISSION

**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 28, 2015