

**Cory J Skolnick**

Member

502.568.0254 (t)

502.581.1087 (f)

cskolnick@fbtlaw.com

March 24, 2016

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PUBLIC SERVICE  
COMMISSION

Hon. James W. Gardner  
Acting Executive Director  
Public Service Commission of Kentucky  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602-0615

**In the Matter of: Joint Application of Kenergy Corp. and Big Rivers Electric  
Corporation for Approval of Contracts  
Case No. 2016-00117**

Dear Chairman Gardner:

We are legal counsel to Aleris Rolled Products, Inc. ("Aleris"). In that capacity, enclosed please find one (1) original and eleven (11) copies of Aleris's Motion to Intervene for the Limited Purpose of Protecting Confidential Information for filing in the above matter.

Please file-stamp the additional copy and return it in the enclosed self-addressed stamped envelope.

Should you have any question with regard to this matter, please do not hesitate to contact me.

Sincerely,



Cory J Skolnick  
Member

CJS:mog

Enclosure

EN11442.Public-11442 4827-0824-9391v1

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

MAR 24 2016  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

JOINT APPLICATION OF KENERGY )  
CORP. AND BIG RIVERS ELECTRIC ) Case No. 2016-00117  
CORPORATION FOR APPROVAL )  
OF CONTRACTS )

**ALERIS ROLLED PRODUCTS, INC.'S MOTION TO INTERVENE  
FOR THE LIMITED PURPOSE OF PROTECTING CONFIDENTIAL INFORMATION**

Pursuant to Section 4(11) of 807 KAR 5:001, Aleris Rolled Products, Inc. ("Aleris") hereby moves the Public Service Commission of the Commonwealth of Kentucky ("Commission") for intervention in the above-captioned matter. Aleris seeks intervention for the limited purpose of protecting its own confidential information. In support of its motion, Aleris states as follows:

1. The full name and address of Aleris is: Aleris Rolled Products Inc., 1372 State Road 1957, Lewisport, KY 42351-0480.
2. For purposes of this motion to intervene, and to satisfy Section 4(11)(a)(1) of 807 KAR 5:001, Aleris's electronic email address is: cskolnick@fbtlaw.com.
3. The parties to this matter, Kenergy Corp. ("Kenergy") and Big Rivers Electric Corporation ("Big Rivers"), have filed a Joint Application for Approval of Contracts.
4. Big Rivers and Aleris have filed a Joint Petition for Confidential Protection ("Joint Petition") seeking confidential treatment of certain commercially-sensitive information related to the contracts.
5. The Joint Petition notes that Aleris would file this limited motion to intervene concurrent with the Joint Petition.

6. Aleris seeks intervention for the limited purpose of protecting its own confidential information that is part of a larger request for confidential treatment.

7. The factual and legal analyses for confidential treatment are set forth in the Joint Petition, which is incorporated fully herein by reference.

8. Aleris has a special interest in this matter because Aleris's confidential information is at issue. Aleris's interests will not be fully and adequately represented without its limited intervention.

9. Should any action beyond the Joint Petition be required, Aleris's participation would assist the Commission in developing facts and addressing issues related to Aleris's confidential information.

10. Should Aleris be permitted to intervene in this matter, its intervention would not unduly complicate or disrupt the proceedings.

11. It is Aleris's understanding that Kenergy and Big Rivers have consented to Aleris's limited intervention.

WHEREFORE, Aleris respectfully requests that the Commission grant its motion to intervene for the limited purpose of seeking to protect its own confidential information.

DATED: March 24, 2016

Respectfully submitted,



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Cory J. Skolnick  
FROST BROWN TODD, LLC  
400 West Market Street, 32nd Floor  
Louisville, KY 40202  
(502) 589-5400  
(502) 581-1087 (fax)  
[cskolnick@fbtlaw.com](mailto:cskolnick@fbtlaw.com)

*Counsel for Aleris Rolled Products, Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing Motion to Intervene by U.S. First Class Mail on this 24<sup>th</sup> day of March, 2016, on the following:

J. Christopher Hopgood  
Dorsey, Gray, Norment & Hopgood  
318 Second Street  
Henderson, Kentucky 42420  
*Counsel for Kenegy Corp.*

James M. Miller  
Tyson Kamuf  
Sullivan, Mountjoy, Stainback & Miller, P.S.C.  
100 St. Ann Street  
P. O. Box 727  
Owensboro, Kentucky 42302-0727  
*Counsel for Big Rivers Electric Corporation*

Hon. Erik Dunnigan  
Acting Secretary  
Cabinet for Economic Development  
Old Capitol Annex  
300 West Broadway Street  
Frankfort, KY 40601

Rebecca Goodman  
Lawrence W. Cook  
Assistant Attorneys General  
1024 Capital Center Dr., Suite 200  
Frankfort, KY 40601

Michael L. Kurtz, Esq.  
Boehm, Kurtz & Lowry  
36 E. Seventh St., Suite 1510  
Cincinnati, Ohio 45202  
*Counsel for Kentucky Industrial Utility Customers*

  
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*Counsel for Aleris Rolled Products, Inc.*