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**RECEIVED**

**APR 18 2016**

**PUBLIC SERVICE  
COMMISSION**

**Via Overnight Mail**

April 15, 2016

James W. Gardner, Acting Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**Re: Case No. 2016-00117**

Dear Mr. Gardner:

Please find enclosed the original and ten (10) copies of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. MOTION TO INTERVENE for filing in the above-referenced matter.

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

Very Truly Yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.


**BOEHM, KURTZ & LOWRY**

MLKkew  
Attachment

cc: Certificate of Service  
Quang Nyugen, Esq.  
Richard Raff, Esq.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail (when available) and by regular, U.S. mail, unless other noted, this 15<sup>th</sup> day of April, 2016 to the following:



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Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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318 Second Street  
Henderson, KENTUCKY 42420

Cory J Skolnick  
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400 West Market Street  
32nd Floor  
Louisville, KENTUCKY 40202-3363

Honorable James M Miller  
Sullivan, Mountjoy, Stainback & Miller, PSC  
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Kent Chandler  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
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Kenergy Corp.  
6402 Old Corydon Road  
P. O. Box 18  
Henderson, KY 42419

Big Rivers Electric Corporation  
201 Third Street  
P. O. Box 24  
Henderson, KY 42420

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

APR 18 2016

IN THE MATTER OF: JOINT APPLICATION OF KENERGY CORP. :  
AND BIG RIVERS ELECTRIC CORPORATION FOR APPROVAL :  
OF CONTRACTS :

Case No. 2016-00117

PUBLIC SERVICE  
COMMISSION

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MOTION TO INTERVENE OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

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Pursuant to K.R.S. §278.310 and 807 KAR 5:001, Section 4(11), 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 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.

2. The members of KIUC who purchase electricity from Big Rivers Electric Corporation ("Big Rivers") through Kenergy Corp. who will participate herein are: Domtar Paper Co., LLC and Kimberly Clark Corporation.

3. All KIUC member companies have a similar interest in ensuring that the rates charged by Big Rivers to Kenergy for pass-through to retail consumers are just and reasonable.

4. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC members for electricity. Electricity represents a significant cost of doing business for KIUC members. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.  
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5. 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,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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**COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY  
CUSTOMERS, INC.**

April 15, 2016