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MAR 07 2017

PUBLIC SERVICE
COMMISSION

Via Overnight Mail

March 6, 2017

Talina Mathews, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2017-00099

Dear Ms. Mathews:

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.

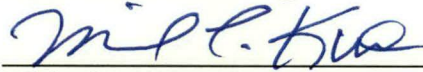
BOEHM, KURTZ & LOWRY

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 6th day of March, 2017 to the following:



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

Kentucky Power Company
855 Central Avenue, Suite 200
Ashland, KY 41101

Kenneth J Gish, Jr.
Stites & Harbison
250 West Main Street, Suite 2300
Lexington, KENTUCKY 40507

Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

Honorable Mark R Overstreet
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

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

IN THE MATTER OF APPLICATION OF KENTUCKY POWER :
COMPANY (1) FOR AUTHORITY TO AMEND TEMPORARILY :
TARIFF C.S. – I.R.P. AND TARIFF E.D.R.; (2) TO ESTABLISH :
TEMPORARILY TARIFF C.S. – COAL; (3) FOR LEAVE TO :
DEVIATE FROM THE NOTICE REQUIREMENTS OF 807 KAR :
5:011, SECTION 8; (4) FOR RELATED ACCOUNTING RELIEF; :
AND (5) FOR ALL OTHER REQUIRED APPROVALS AND :
RELIEF

Case No 2017-00099

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PUBLIC SERVICE
COMMISSION

**MOTION TO INTERVENE OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Pursuant to KRS §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 and gas 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. The members of KIUC who are served by Kentucky Power and will participate herein are: Air Products and Chemicals, Inc., Airgas, Inc., AK Steel Corporation and Catlettsburg Refining LLC, a subsidiary of Marathon Petroleum LP. These customers purchase approximately 20% of all retail electricity sold by Kentucky Power. KIUC will supplement the names of additional intervenors when necessary.

2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC for electricity. Electricity represents a significant cost of doing business for KIUC. 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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3. 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.**

March 6, 2017