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**Via Overnight Mail**

April 3, 2017

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APR 04 2017

PUBLIC SERVICE  
COMMISSION

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

**Re: Case No. 2017-00129**

Dear Ms. Mathews:

Please find enclosed the original and ten (10) copies of NUCOR STEEL GALLATIN'S 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.

**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 3<sup>rd</sup> day of April, 2017 to the following:



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Michael L. Kurtz, Esq.

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

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

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

In The Matter Of: THE APPLICATION OF EAST KENTUCKY :  
POWER COOPERATIVE, INC. FOR A DECLARATORY ORDER :  
CONFIRMING THE EFFECT OF KENTUCKY LAW AND :  
COMMISSION PRECEDENT ON RETAIL ELECTRIC :  
CUSTOMERS' PARTICIPATION IN WHOLESALE ELECTRIC :  
MARKETS :

Case No. 2017-00129

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PUBLIC SERVICE  
COMMISSION

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**MOTION TO INTERVENE OF  
NUCOR STEEL GALLATIN**

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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.  
**BOEHM, KURTZ & LOWRY**  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
Ph: (513) 421-2255, Fax: (513) 421-2764  
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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,



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Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

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513.421.2255 Fax: 513.421.2764

E: mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

**COUNSEL FOR NUCOR STEEL GALLATIN**

April 3, 2017