BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW 36 EAST SEVENTH STREET SUITE 2110 CINCINNATI, OHIO 45202 TELEPHONE (513) 421-2255

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Via Overnight Mail

June 27, 2006

Beth A. O'Donnell, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: <u>Case No. 2006-00208</u>

Dear Ms. O'Donnell:

Please find enclosed the original and twelve (12) copies of the Petition to Intervene of Kentucky Industrial Utility Customers, Inc. 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,

mplh

David F. Boehm, Esq. Michael L. Kurtz, Esq. **BOEHM, KURTZ & LOWRY**

MLKkew Attachment cc: Certificate of Service RECEIVED

JUN 2 8 2006

PUBLIC SERVICE COMMISSION

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 27th day of June, 2006.

Honorable Elizabeth E. Blackford Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204 betsv.blackford@law.state.ky.us

Mr. Kent W. Blake Director State Regulations and Rates Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010 kent.blake@lgeenergy.com

Honorable Elizabeth L. Cocanougher Senior Corporate Attorney Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

npphi

David F. Boehm, Esq. Michael L. Kurtz, Esq.

KECEIVED ENTUCKY

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of: Application of Louisville Gas & Electric Company For Approval of its 2006 Compliance Plan For Recovery By Environmental Surcharge JUN 2 8 2006

PUBLIC SERVICE

: No. 2006-00208

PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), 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 purchase electricity from Louisville Gas & Electric ("LG&E") and who will participate herein are: Carbide Industries LLC, Ford Motor Company, Arch Chemicals, Kosmos Cement Company, Protein Technologies International and Rohm & Haas Kentucky, Inc. KIUC will supplement its Petition with the names of additional participating members as this information becomes known.

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. David F. Boehm, Esq. **BOEHM, KURTZ & LOWRY** 36 E. Seventh Street, Suite 1510 Cincinnati, Ohio 45202 Ph: (513) 421-2255, Fax: (513) 421-2765 E-Mail: <u>mkurtz@BKLlawfirm.com</u> dboehm@BKLlawfirm.com

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,

PAA

Michael L. Kurtz, Esq. David F. Boehm, Esq. **BOEHM, KURTZ & LOWRY** 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 Ph: (513) 421-2255 Fax: (513) 421-2764 E-Mail: <u>mkurtz@BKLlawfirm.com</u>

COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

June 26, 2006