

# HURT, CROSBIE & MAY PLLC

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July 18, 2012

*Via Hand-Delivery*

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

RECEIVED  
JUL 18 2012  
PUBLIC SERVICE  
COMMISSION

RE: *Case No. 2012-00221; Application of Kentucky Utilities Company*

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the Kentucky School Boards Association's motion to intervene. By copy of this letter, all parties listed on the Certificate of Service have been served. Please place the document of file.

In accordance with the Commission's Order of June 22, 2012, I hereby certify that the Kentucky School Boards Association and its agents are capable of receiving electronic transmissions, waive any right to receive service of the Commission Orders by U.S. Mail and consent to the use of electronic filing procedures and the service of all documents and pleadings, including Orders of the Commission, by electronic means.

Regards,



Matthew Malone

C: File

Enc.

cc: Counsel of Record

RECEIVED

JUL 18 2012

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of: : CASE NO. 2012-00221  
THE APPLICATION OF KENTUCKY UTILITIES :  
COMPANY FOR AN ADJUSTMENT OF ITS :  
ELECTRIC RATES :

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**KENTUCKY SCHOOL BOARDS ASSOCIATION'S MOTION TO INTERVENE**

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Comes the Kentucky School Boards Association ("KSBA") pursuant to 807 KAR 5:001 Section 3(8), by counsel, and moves that it be granted leave to intervene in this matter and that it be granted full intervention. In support of this Motion, KSBA states as follows:

KSBA is a nonprofit corporation of school boards from each public school district in Kentucky. KSBA serves school board members and school districts in such areas including but not limited to energy policy. KSBA is governed by a 27-member board of directors made up of representatives elected as regional chairpersons or as directors-at-large. With nearly 900 school board members, KSBA is the largest organization of elected officials in Kentucky.

KSBA has involvement with energy initiatives with its representative school boards and electric service and other energy costs represent a significant cost of representative school district budgets.

In this matter the Commission is in the process of examining the request of Kentucky Utilities Company for a general adjustment in electric rates, significant changes in its pricing structure and other matters. Approval of this application would have a significant impact on KSBA's school board districts and their budgets. KSBA represents all of the public school boards within Kentucky Utility Company's service territory. As such, KSBA has a special interest in this proceeding and KSBA's interests are not adequately represented by the other parties to this proceeding. KSBA will present issues and develop facts that will be helpful to the

Commission in fully hearing this matter, and participation by KSBA will not unduly delay these proceedings, or unduly complicate or disrupt them.

Additionally, of note, Scott County Schools filed a letter on July 10, 2012 regarding proposed rate adjustments related to this proceeding. As a member of KSBA, Scott County Schools will have representation in this matter through KSBA if the Commission grants full intervenor status to KSBA.

The attorneys for KSBA authorized to represent it in this proceeding and to take service of all documents are:

Matthew R. Malone, Esq.  
William H. May, III. Esq.  
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**Wherefore**, KSBA respectfully requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,  
  
Matthew R. Malone  
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Counsel for the Petitioner,  
**KENTUCKY SCHOOL BOARDS ASSOCIATION**

**CERTIFICATE OF SERVICE**

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served via hand-delivery upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail, postage prepaid, on the following, all on this 18<sup>th</sup> day of July, 2012.

Hon. David C. Brown  
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Louisville, Kentucky 40202

Hon. Michael L. Kurtz  
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Hon. Dennis G. Howard, II  
Hon. Lawrence W. Cook  
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Hon. Robert M. Watt, III  
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