

RECEIVED

400 West Market Street Suite 1800 Louisville, KY 40202-3352 [502] 587-3400 [502] 587-6391 Fax www.stites.com

November 30, 2012

DEC 3 2012

PUBLIC SERVICE

COMMISSION

David C. Brown (502) 681-0421 (502) 779-8251 FAX dbrown@stites.com

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

RE:

Application of Big Rivers Electric Corporation;

Case No. 2012-00492

Dear Mr. Derouen:

Please find enclosed for filing the original and twelve (12) copies of a Petition for Full Intervention of Alcan Primary Products Corporation in the above-styled matter. I have served copies on the parties listed on the Certificate of Service.

Please call if you have any questions.

Very truly yours.

David C. Brown

DCB/dab

Enclosure

cc: Parties of Record

AL080:0AL11:907971:1:LOUISVILLE

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

DEC \$ 2012

PUBLIC SERVICE
COMMISSION

In The Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)	CASE NO. 2012-00492
CORPORATION FOR APPROVAL TO ISSUE)	
EVIDENCES OF INDEBTEDNESS)	

PETITION FOR FULL INTERVENTION OF ALCAN PRIMARY PRODUCTS CORPORATION

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Alcan Primary Products Corporation ("Alcan") requests that it be granted full intervenor status in the above captioned proceeding and states in support thereof as follows:

- 1. Alcan owns and operates an aluminum reduction facility in Sebree, Kentucky, producing approximately 200,000 tonnes of aluminum a year with approximately 500 employees. Alcan purchases electric energy generated by Big Rivers Electric Corporation ("Big Rivers") under a Retail Electric Service Agreement dated July 16, 2009.
- 2. Electric service represents a significant cost of doing business for Alcan. The financing proposed by Big Rivers will adversely affect the rates of Alcan. Therefore, Alcan has a special interest in this proceeding that cannot be adequately represented by any other entity. Alcan intends to play a constructive role in the Commission's decision making process herein and its participation will not unduly prejudice any party.
- 3. Alcan has been advised by Big Rivers that it intends to file an application by January 15, 2013, for authority to increase its base rates to recover the revenue anticipated to be lost by the Notice of Termination given by Century Aluminum of Kentucky General Partnership

on August 20, 2012, and that the application will seek a substantial rate increase from Alcan. The Application in this case is and should be viewed as part of the larger picture involving Big Rivers' costs and the impact on Alcan's rates for electric service.

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

David C. Brown, Esq. Stites & Harbison, PLLC 400 W. Market Street, Suite 1800 Louisville, KY 40202 Phone: (502) 681-0421

Fax: (502) 587-6391 Email: dbrown@stites.com

Donald P. Seberger, Esq. Special Counsel Rio Tinto Alcan 8770 West Bryn Mawr Avenue Chicago, Illinois 60631

Phone: (773) 787-9702

Email: Donald.seberger@riotinto.com

WHEREFORE, Alcan Primary Products Corporation requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

David C. Brown, Esq. Stites & Harbison, PLLC

400 West Market Street, Suite 1800

Louisville, KY 40202

Counsel for Alcan Primary Products

CERTIFICATE

A copy of the foregoing Petition for Full Intervention has been served by United States mail on the following persons this the 2014 day of November, 2012:

James M. Miller Tyson Kamuf Sullivan, Mountjoy, Stainback & Miller 100 St. Ann Street Owensboro, Kentucky 42302

Michael L. Kurtz, Esq. Boehm Kurtz & Lowry 2110 CBLD Center 36 East Seventh Street Cincinnati, OH 45202

David C. Brown