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PUBLIC SERVICE  
COMMISSION

February 18, 2013

Hon. Jeff R. Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort KY 40601-8294

***RE: In the Matter of: Application of Big Rivers Electric Corporation for a General Adjustment in Rates, Case No. 2012-00535***

Dear Mr. Derouen:

With this letter I have enclosed an original and 11 copies of Big Rivers Electric Corporation's Response to Petition of Ben Taylor and Sierra Club for Full Intervention.

Very truly yours,

DINSMORE & SHOHL LLP

Edward T. Depp

ETD/bmt

Enclosures

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Application of Big Rivers Electric    )  
Corporation for a General            )  
Adjustment in Rates                    )                    Case No. 2012-00535

**BIG RIVERS ELECTRIC CORPORATION'S RESPONSE TO  
PETITION OF BEN TAYLOR AND SIERRA CLUB FOR  
FULL INTERVENTION**

Big Rivers Electric Corporation ("Big Rivers"), by counsel, and for its response and objection to the Petition of Ben Taylor and Sierra Club (each individually a "Petitioner" and collectively the "Petitioners") for Full Intervention (the "Petition"), states as follows.

Under 807 KAR 5:001 § 4(11)(b), the Public Service Commission of Kentucky (the "Commission") shall grant a person leave to intervene only if either: (i) that person has a "special interest in the case that is not otherwise adequately represented;" or (ii) "that intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings." The Commission grants requests for intervention "only upon a determination that the criteria set forth in 807 KAR 5:001 [§4(11)(b)] have been satisfied." *In the Matter of: The 2008 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, Ky. P.S.C. Case No. 2008-00148, Order of July 18, 2008. Each Petitioner, therefore, must demonstrate that it satisfies the requirements of at least one of the Commission's grounds for intervention.

Here, Petitioners do not have a "special interest in the case that is not otherwise adequately represented," nor are they "likely to present issues or to develop facts that assist the

commission in fully considering the matter without unduly complicating or disrupting the proceeding.” As a result, the Petitioners fail to satisfy the requirements of both permissible grounds for intervention pursuant to 807 KAR 5:001 § 4(11)(b), and Big Rivers respectfully requests that the Commission deny the Petition.

**I. The Commission Should Deny the Petition to Intervene Because Neither Petitioner Has a Special Interest in this Proceeding That is Not Otherwise Adequately Represented.**

In order to meet first ground for intervention under Section 4(11)(b), a petitioner must demonstrate that it has an “interest in the case” that is a “special” interest, which is “not otherwise adequately represented.” Although the Petition frequently (albeit inconsistently) attempts to fuse Mr. Taylor and Sierra Club into a singular entity with an indistinguishable foundation for intervention, each Petitioner must qualify separately for intervention. In the present case, neither Petitioner satisfies the requirements of the “special interest” ground for intervention.

**A. Mr. Taylor Does Not Have a “Special Interest in the Case That Is Not Otherwise Adequately Represented.”**

Mr. Taylor’s intervention should be denied because he fails to satisfy two separate components of this ground for intervention: (i) Mr. Taylor does not have a “special interest;” and (ii) any interest Mr. Taylor may espouse is “adequately represented” by the presence of the Office of the Attorney General (the “AG”) in this proceeding.

The Petition states that Mr. Taylor is “a customer and rate payer of Kenergy Corporation, which is one of Big Rivers’ distribution cooperative members.” (Petition, p. 9.) As a customer, the Petition continues, “he helps fund Big Rivers’ operations,” and this proceeding will “directly impact his bills.” (*Id.*) Finally, the Petition posits that Mr. Taylor “is impacted by the economic, public health, and environmental effects of the resource decisions that Big Rivers makes.” (*Id.*)

Mr. Taylor seeks to intervene despite his acknowledgement of the important role of the AG in ratemaking proceedings and the AG's duty to intervene in order to "represent[] all consumers and all of their diverse interests." (Petition, p. 9 (emphasis added).) *See also* KRS § 367.150(8)(b) (AG authorized to intervene in ratemaking whenever it deems intervention "necessary and advisable"); *In the Matter of: Application of Big Rivers Electric Corporation, Inc. for an Adjustment of Rates*, Ky. P.S.C. Case No. 2012-00535, Attorney General's Motion to Intervene of December 5, 2012 (stating that KRS § 367.150(8)(b) gives the AG the "obligation to appear before regulatory bodies of the Commonwealth of Kentucky to represent consumers' interests"). It is well-established that "[t]he only person with a statutory right to intervene is the AG" and "[i]ntervention by all others is permissive and with the sound discretion of the Commission." *In the Matter of: Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, A Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Lines and Risers, and a Gas Line Surcharge*, Ky. P.S.C. Case No. 2012-00222, Order of September 7, 2012.

Mr. Taylor claims that, as a customer, a rate change will "directly impact his bills" and that he is generally impacted by the "decisions that Big Rivers makes." (Petition, p. 9.) These concerns are not "special interests" in this proceeding within the meaning of 807 KAR 5:001 § 4(11)(b). Big Rivers' member cooperatives provide end-user services to more than 112,000 homes, farms, businesses, and industries located across 22 counties. (See *In the Matter of: Application of Big Rivers Electric Corporation for a General Adjustment of Rates*, Big Rivers Electric Corporation Application of January 16, 2013, Volume 2 of 5, Tab No. 35, Annual Report of Big Rivers Electric Corporation for the Year Ended December 31, 2011, p. 2.) Many of these end-users, like Mr. Taylor, are concerned with their electric bills and the impact of this

proceeding. In fact, Petitioners even admit Mr. Taylor’s interests are not special when they argue that “Sierra Club has member(s) who are customers and ratepayers of a distribution cooperative of Big Rivers and, therefore, have the same interests as [Mr. Taylor].” (Petition, p. 9 (emphasis added).)

The Commission has consistently held that status as a customer is not a sufficient special interest to warrant full intervention. *See, e.g., In the Matter of Application of Louisville Gas and Electric Company for a Certificate of Public Convenience and Necessity and Approval of Its 2009 Compliance Plan for Recovery by Environmental Surcharge*, Ky. P.S.C. Case No. 2009-00198, Order of August 28, 2009 (denying customer’s intervention because she could not demonstrate that she “was likely to assist the Commission” and, as a customer, she would “have ample opportunity to participate in [the] proceeding even though she [was] not granted intervenor status”); *In the Matter of: Application of Kentucky Utilities Company for an Order Approving the Establishment of a Regulatory Asset*, Ky. P.S.C. Case No. 2009-00174, Order dated June 26, 2009 (denying State Representative’s intervention because, although he supported his motion to intervene on the basis that he lived in the service area at issue, he “offered no factual basis to justify his request” and he did not demonstrate that he had “a special interest in the issues to be adjudicated”). Furthermore, even if Mr. Taylor was the only customer possessing his unique ideology with respect to decisions that Big Rivers makes, “a particular position on issues pending in this case does not create the requisite ‘special interest’ to justify full intervention.” *In the Matter of: Joint Application of Louisville Gas and Electric Company, Association of Community Ministries, Inc., People Organized and Working for Energy Reform, and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program*, Case No. 2007-00337, Order dated September 14, 2007. Therefore,

Mr. Taylor's interest in this proceeding is not a "special interest" as required by 807 KAR 5:001 § 4(11)(b).

Additionally, any interest Mr. Taylor may advocate is adequately represented by the AG, who is "statutorily required to represent these customers." *In the Matter of: Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, A Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Lines and Risers, and a Gas Line Surcharge*, Ky. P.S.C. Case No. 2012-00222, Order of September 7, 2012. The AG has already been granted full intervention in this proceeding by the Commission. *In the Matter of: Big Rivers Electric Corporation, Inc. for an Adjustment of Rates*, Ky. P.S.C. Case No. 2012-00535, Order of December 10, 2012. The AG's intervention immediately interposed a party in this proceeding who has not only considerable experience with ratemaking proceedings, but also significant expertise in representing the interests of hundreds of thousands of utilities customers. Therefore, Mr. Taylor's interests, which are undoubtedly shared to some extent among the many homes, farms, businesses, and industries affected by this proceeding, are "adequately represented" by the AG in this proceeding.

Because Mr. Taylor does not have a "special interest in this proceeding" and his interests are already "adequately represented" by the AG, he does not meet the requirements of 807 KAR 5:001 § 4(11)(b) and his Petition should be denied.

**B. Sierra Club Does Not Have a Special "Interest in this Proceeding" that is Not Otherwise Adequately Represented.**

Sierra Club's intervention should likewise be denied because it does not have an "interest in this proceeding." The interests of its members are also already "adequately represented" by the AG.

Identified in its Petition as “one of the oldest conservation groups in the country,” (Petition, p. 4.), Sierra Club’s proposed intervention is a charade designed to turn a ratemaking proceeding into an environmental policy proceeding. This is evidenced by its admitted goal of furthering its “unique perspective and experience” by sharing its “developed expertise that encompasses a broad range of environmental and energy concerns.” (*Id.* at 6). The Petition even explicitly argues that no other party can “adequately represent [Sierra Club’s] interests as a national organization that seeks to promote energy efficiency, renewable energy, and other low carbon generation sources as the most reasonable and cost effective way for Big Rivers to maintain essential electric services and meet new and emerging federal regulatory requirements.” (*Id.* at 9 (emphasis added).)

As the Commission observed in denying a previous motion to intervene, “[n]otably absent from the Commission’s jurisdiction are environmental concerns, which are the responsibility of other agencies within Kentucky state government.” *In the Matter of the 2008 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, Ky. P.S.C. Case No. 2008-00148, Order dated July 18, 2008. The Commission has also stated in denying a previous intervention request that “knowledge and experience in the area of renewable energy and energy efficiency . . . are not [necessarily] sufficient to prove that [Petitioner] is knowledgeable about issues of utility ratemaking and rate structures.” *In the Matter of: Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, A Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Lines and Risers, and a Gas Line Surcharge*, Ky. P.S.C. Case No. 2012-00222, Order of September 7, 2012 (emphasis added). Even the Sierra Club acknowledges that the Commission does not make decisions related to environmental considerations. (Petition, p. 7.)

Of the five proceedings cited by Sierra Club in support of its intervention, four involved either an Environmental Surcharge or an Environmental Compliance Plan, and, of those four, Sierra Club's intervention petition was unopposed in two proceedings.<sup>1</sup> The other proceeding involved "complex questions regarding whether natural gas fired facilities represent the least cost option to replacing the coal units the Companies [were] retiring." *Joint Application of Louisville Gas and Electric and Kentucky Utilities for Certificates of Public Convenience and Necessity to Construct Combined Cycle Natural Gas Plant*, Case No. 2011-00375, Order dated December 14, 2011. In contrast, only rate changes are at issue in this proceeding.

Consequently, this ratemaking proceeding is not a proceeding in which Sierra Club has a recognizable interest. Permitting the Sierra Club to intervene on the basis of an environmental "interest" would create a *de facto* right for policy-related organizations to intervene in general rate proceedings.

In an attempt to overcome its lack of a recognizable interest in this proceeding, the Petition also attempts to portray Sierra Club's interest as similar to those of its members who are end-users of the utilities provided by Big Rivers. (Petition, p. 1 (stressing its "members' interest in low-cost energy service".) Such purported economic interests are, by the Sierra Club's own admission, actually interests of its members. As demonstrated in Section II.A above, these

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<sup>1</sup> See, *In the Matter of: Application of Louisville Gas & Electric for an Amended Environmental Compliance Plan, a Revised Surcharge to Recover Costs, and Certificates of Public Convenience and Necessity for the Construction of Necessary Environmental Equipment*, Ky. P.S.C. Case No. 2011-00162; *In the Matter of: Application of Kentucky Utilities for Certificates of Public Convenience and Necessity and Approval of Its 2011 Compliance Plan for Recovery by Environmental Surcharge*, Ky. P.S.C. Case No. 2011-00161; *In the Matter of: Application of Kentucky Power Company for Approval of its Environmental Compliance Plan, Approval of its Amended Environmental Cost Recovery Surcharge Tariffs, and for the Grant of Certificates of Public Convenience and Necessity for the Construction and Acquisition of Related Facilities*, Ky. P.S.C. Case No. 2011-00401 (intervention petition unopposed); *In the Matter of: Application of Big Rivers Electric Corporation for Approval of its 2012 Environmental Compliance Plan, Approval of its Amended Environmental Cost Recovery Surcharge Tariffs, and for the Certificates of Public Convenience, and the Authority to Establish a Regulatory Account*, Ky. P.S.C. Case No. 2012-00063 (intervention petition unopposed).

members have common interests as ratepayers that are already adequately represented by the AG in this proceeding.

In addition, this argument attempts to circumvent long-standing procedural rules. As stated by the Supreme Court of the United States, a person “generally must assert his own legal rights and interests, and cannot rest his claim to relief on the legal rights or interests of third parties.” *Warth v. Seldin*, 422 U.S. 490, 499 (1975). Even if the Commission recognizes this generalized consumer interest, KRS § 367.150(8)(b) establishes that the AG is the appropriate entity to adequately represent “consumer interests” related to rates. In other words, if the interests of Sierra Club’s members are imputed to Sierra Club itself, then the interests of Sierra Club in this proceeding are already adequately represented because “a particular position on issues pending in this case does not create the requisite ‘special interest’ to justify full intervention.” *In the Matter of: Joint Application of Louisville Gas and Electric Company, Association of Community Ministries, Inc., People Organized and Working for Energy Reform, and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program*, Ky. P.S.C. Case No. 2007-00337, Order dated September 14, 2007.

For these reasons, the Sierra Club does not have any recognizable interest, much less the required “special interest,” necessary to satisfy the standard for full intervention in this proceeding. Its interest in this proceeding is clearly of an environmental nature. This proceeding, however, does not relate to these environmental concerns but instead relates to general ratemaking and to those who have an interest in rate structures. To the extent Sierra Club’s interest can instead be characterized as the economic interests of its members, those interests are already “adequately represented” by the AG.

Because the Sierra Club does not have a “special interest in this proceeding” and any of its members’ relevant interests are already “adequately represented” by the AG, it does not meet the requirements of 807 KAR 5:001 § 4(11)(b) and its Petition should be denied.

**II. The Commission Should Deny the Petition to Intervene Because the Petitioners are Not Likely to Present Issues or to Develop Facts that Assist the Commission in Fully Considering the Matter Without Unduly Complicating or Disrupting the Proceedings**

In order to meet second permissible ground for intervention under Section 4(11)(b), a petitioner must demonstrate the likelihood of presenting issues or developing facts that “assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.” Therefore, a Petitioner must be able to demonstrate not only that it could assist the Commission in fully considering the matter, but, additionally, that such assistance would not complicate or disrupt the proceedings.

In this case, Big Rivers filed an application with the Commission to adjust its rates under KRS § 278.180. The Petition, in arguing that the Petitioners will assist the Commission in this case, states that the Petitioners “will ensure that the options beyond simply raising rates are examined.” (Petition, p. 5 (emphasis added).) According to the Petition, the Petitioners will present their information in order to produce a “robust examination of the comparative options available” to Big Rivers. (*Id.* at 8 (emphasis added).) Petitioners propose to assist the Commission in this rate proceeding by providing its expertise in “developing plans for providing a lower cost and cleaner energy future,” “identifying the lowest cost mix of supply- and demand-side resources,” “advancing technical and regulatory solutions to increasing renewable and demand side energy sources,” and “increasing availability of low cost energy efficiency and renewable energy alternatives.” (*Id.* at 3, 6-7).

This information will not assist the Commission with respect to Big Rivers' application for an adjustment of rates. As the Commission noted, "knowledge and experience in the area of renewable energy and energy efficiency . . . are not [necessarily] sufficient to prove that [Petitioner] is knowledgeable about issues of utility ratemaking and rate structures." *In the Matter of: Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, A Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Lines and Risers, and a Gas Line Surcharge*, Ky. P.S.C. Case No. 2012-00222, Order of September 7, 2012 (emphasis added). The proposed presentation of information in the area of renewable energy and energy efficiency does not have a sufficient nexus to general ratemaking to be of any assistance in this matter. Instead, the information would be nothing more than distracting, generalized environmental grievances that are beyond the scope of this rate application proceeding.

In fact, Petitioners submitted thirty-three (33) "Requests for Information to Big Rivers Electric Cooperative [*sic*]" on February 14, 2013. It is difficult to perceive an added benefit accruing to the Commission when the AG, alone, has submitted two hundred eighty-nine (289) comprehensive, multi-part data requests to Big Rivers as of the date of this Response.

Finally, even if the Petitioners could demonstrate that they would present issues or develop facts that would assist the Commission in this proceeding—a showing that has not been made—intervention by either or both of the Petitioners would unduly complicate and disrupt this proceeding. The Petition argues that because the Petitioners are "represented by experienced counsel and will comply with all deadlines," their participation will not disrupt the proceeding. (Petition, p. 8.) This statement, however, ignores that Petitioners, through counsel, seek to address issues that are beyond the scope of ratemaking.

Moreover, the Petitioners have already unduly complicated and disrupted this proceeding by submitting thirty-three (33) multipart “Requests for Information to Big Rivers Electric Cooperative [*sic*]” on February 14, 2013 (the “Requests”) prior to even being granted intervention. Not only do these Requests predominately seek to obtain information beyond the scope of issues in this rate case, they also further disrupt this proceeding by creating uncertainty regarding whether and when Big Rivers is obligated to respond to these Requests and further impairing Big Rivers’ ability to timely and completely respond to the multitude of other data requests filed by parties who timely moved to intervene in this case.

The Commission has previously held that these environmental issues “unduly complicate and disrupt proceedings,” and duplicate representation already provided by the AG. *See, e.g., In the Matter of: Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Base Rates*, Ky. P.S.C. Case No. 2008-00252, Order dated October 10, 2008 (holding that a petitioner’s interest as an environmentalist in the utility’s rate structure was “beyond the scope of the Commission’s jurisdiction,” and, as a result, allowing the petitioner to intervene would “unduly complicate and disrupt the proceeding”); *In the Matter of: The Joint Application Pursuant to 1994 House Bill No. 501 for the Approval of Kentucky Power Company Collaborative Demand-Side Management Programs and Authority to Implement a Tariff to Recover Costs, Net Lost Revenues and Receive Incentives Associated with the Implementation of the Kentucky Power Company Collaborative Demand-Side Management Programs*, Ky. P.S.C. Case No. 2008-00350, Order dated October 13, 2008 (holding that a petitioner’s interest as an environmentalist in the utility’s DSM application was “beyond the scope of the Commission’s jurisdiction,” and , as a result, allowing the petitioner to intervene would “unduly complicate and disrupt the proceeding”).

Because the Petitioners' intervention would unduly complicate and disrupt this proceeding, they do not meet the requirements of 807 KAR 5:001 § 4(11)(b) and their Petition should be denied.

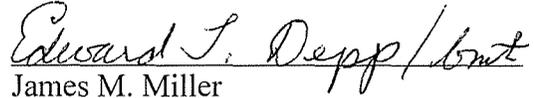
### **III. Conclusion**

Neither Petitioner has "a special interest in the case that is not otherwise adequately represented or is likely to present issues." Neither Petitioner has demonstrated that its intervention is "likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings." Mr. Taylor does not have a special interest because his interests originate from his status as a customer and are shared by other similarly situated individuals. Moreover, his interest is adequately represented by the AG who has intervened as of right in this proceeding. Sierra Club does not have an interest in this proceeding because its interests do not arise in the context of ratemaking. The interests of its members should not be imputed to the organizational Petitioner; however, if they are so imputed, such interests are adequately represented in this proceeding by the AG.

In addition, neither Petitioner is likely to present issues or develop facts to assist the Commission without unduly complicating or disrupting this proceeding. Any information offered to assist the Commission with respect to a Petitioners' interest as a customer will be unnecessarily duplicative of the AG's role in the proceeding. Any information offered with respect to issues unrelated to ratemaking cannot assist the Commission because it is beyond the scope of this proceeding.

WHEREFORE, Big Rivers respectfully requests that the Commission deny the Petition of Ben Taylor and Sierra Club.

Respectfully submitted,



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*Counsel for Big Rivers Electric Corporation*

**Certificate of Notice**

I certify that a true and accurate copy of the foregoing was served by first class mail, postage prepaid, upon the persons listed on the attached service list, on this the 18<sup>th</sup> day of February, 2013.

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