

1 COMMONWEALTH OF KENTUCKY

2 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

3 In the Matter of:

4 JOINT APPLICATION OF LOUISVILLE GAS )  
5 AND ELECTRIC COMPANY AND KENTUCKY )  
6 UTILITIES COMPANY FOR CERTIFICATES )  
7 OF PUBLIC CONVENIENCE AND NECESSITY )  
8 FOR THE CONSTRUCTION OF A COMBINED ) CASE NO. 2014-0002  
9 CYCLE COMBUSTION TURBINE AT THE )  
10 GREEN RIVER GENERATING STATION AND )  
11 A. SOLAR PHOTOVOLTAIC FACILITY AT THE )  
12 E.W. BROWN GENERATING STATION )

13  
14 MOTION TO INTERVENE

15 The movant, Big Rivers Electric Corporation ("*Big Rivers*"), seeks through  
16 counsel an order of the Public Service Commission ("*Commission*") pursuant to 807  
17 KAR 5:001, §4(11) granting it full intervention in this matter.

18 Big Rivers is a member-owned, not-for-profit, generation and transmission  
19 cooperative headquartered in Henderson, Kentucky. It provides wholesale electric  
20 power and services to three distribution cooperative members, who in turn are the  
21 retail electric suppliers to customers in all or portions of 22 counties in Western  
22 Kentucky. Big Rivers' post office address is P.O. Box 24, Henderson, Kentucky,  
23 42419-0024. Big Rivers' street address is 201 Third Street, Henderson, Kentucky,  
24 42420. Its electronic mail address is regulatory@bigrivers.com.

25 Big Rivers owns or operates 1819 MW of electric generating capacity in  
26 Western Kentucky. As a result of the recent departure of two large industrial retail

1 customers from Big Rivers' system, approximately 850 MW of generating capacity  
2 became available.<sup>1</sup>

3 Big Rivers' purpose for seeking to participate in this matter is its interest in  
4 helping the Commission to ascertain that available alternatives to the proposals of  
5 the joint applicants have been adequately and thoroughly studied and considered.  
6 Big Rivers' available generating capacity may present one such alternative. Big  
7 Rivers' expertise, interests, location and resources are unique, and will enable it to  
8 assist the Commission in fully considering the issues presented in this matter  
9 without unduly complicating or disrupting the proceedings. Big Rivers' special  
10 interest in this proceeding is not and cannot be represented by any other party.

11 WHEREFORE, Big Rivers asks the Commission to make an order granting it  
12 full intervention in this matter, and granting all other relief to which Big Rivers  
13 may appear entitled.

14 Respectfully submitted,

15 Sullivan, Mountjoy, Stainback & Miller,  
16 PSC

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18 By:



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<sup>1</sup> For a detailed description of these circumstances, see the order dated January 30, 2014, in *In the Matter of: The Joint Application of Kenergy Corp. and Big Rivers Electric Corporation for Approval of Contracts and for a Declaratory Order*, P.S.C. Case No. 2013-00413, and the order dated August 16, 2013, in *In the Matter of: The Joint Application of Kenergy Corp. and Big Rivers Electric Corporation for Approval of Contracts and for a Declaratory Order*, P.S.C. Case No. 2013-00221.