

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>APPLICATION OF KENTUCKY</b>	)	
<b>UTILITIES COMPANY FOR AN</b>	)	<b>CASE NO. 2014-00371</b>
<b>ADJUSTMENT OF ITS ELECTRIC RATES</b>	)	

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**SIERRA CLUB’S MOTION FOR LEAVE TO LATE-FILE REPLY IN  
SUPPORT OF PETITION FOR FULL INTERVENTION AND TO AMEND  
PETITION FOR THE PURPOSE OF ADDING INDIVIDUAL INTERVENERS**

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Comes Sierra Club (“Movant”), by and through counsel, and hereby moves the Commission for leave to late-file its Reply in Support of Petition for Full Intervention. Furthermore, Movant seeks leave to amend its Petition for Full Intervention to add individual interveners, Alice Howell and Carl Vogel. In support of this motion, Movants state as follows:

On December 22, 2014, KU (“the Company”) filed its response objecting to the petition of Movants for full intervention (“the Petition”). The Company’s response objecting to the Petition was not served on Movants’ counsel by either mail or electronic transmission. As a result, undersigned local counsel was first made aware of the Company’s response objecting to Movants’ full intervention on December 30, 2014. At that time, Ms. Casey Roberts, counsel for Sierra Club who drafted the Petition, was on vacation with no cell phone service. Ms. Roberts only returned to her office on January 2, 2015.

When undersigned local counsel notified counsel for the Company, Mr. Riggs, on December 30, 2014 that he had only just seen the objection, Mr. Riggs left a voice mail apologizing for the oversight in not serving a copy by electronic transmission. Subsequently, Mr.

Riggs, on behalf of the Company, notified undersigned local counsel that the Company does not object to the motion seeking leave to late-file the Reply no later than Wednesday, January 7, 2015.

Additionally, part of the Company's objection to the motion of Movant for full intervention was that the Petition was only filed on behalf of Sierra Club and not on behalf of any of its individual members. Consequently, Movant now moves the Commission for leave to add Alice Howell and Carl Vogel, Sierra Club members who reside at 918 Aurora Avenue, Lexington, Kentucky 40502, and are KU customers, as interveners.

Consequently, Movants respectfully move the Commission for leave to late-file the attached Reply in Support of Petition for Full Intervention and for leave to amend its Petition to add Alice Howell and Carl Vogel as interveners.

Respectfully submitted,



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Dated: January 7, 2015

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of SIERRA CLUB'S MOTION FOR LEAVE TO LATE-FILE REPLY IN SUPPORT OF PETITION FOR FULL INTERVENTION AND TO AMEND PETITION FOR THE PURPOSE OF ADDING INDIVIDUAL INTERVENERS is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on January 7, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being hand delivered to the Commission.



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JOE F. CHILDERS