

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR AN ADJUSTMENT OF ITS) Case No. 2014-00371
ELECTRIC RATES)

MOTION TO INTERVENE
OF WAL-MART STORES EAST, LP

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Motion to Intervene, Walmart submits as follows:

1. On November 26, 2014, Kentucky Utilities Company ("KU" or "Company") filed an Application seeking approval for adjustment of its electric rates.
2. Walmart is a national retailer of goods and services throughout the United States. Walmart's principal office is at 2001 SE 10th Street, Bentonville AR 72716-0550.
3. Walmart has the privilege of providing its retail services in the Commonwealth of Kentucky. Walmart is a large commercial customer of the Company. Walmart has multiple facilities in Kentucky that are served by the Company. Walmart purchases more than 100 million kWh annually from the Company, principally pursuant to service under a Time-of-Day Secondary rate schedule. Electricity is one of the single highest operating costs faced by Walmart. As a result, any modification to the Company's rates has the potential to substantially impact Walmart's operations in Kentucky.

4. Accordingly, Walmart has a direct and substantial interest in the outcome of this proceeding. Further, Walmart is unique in that it is a single commercial customer that purchases substantial amounts of electric and related services from the Company pursuant to multiple accounts at multiple locations. Thus, Walmart has an interest in this proceeding that is not represented by any other party.

5. The attorneys representing Walmart in this proceeding are:

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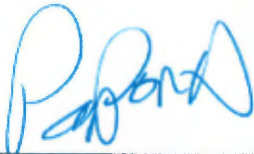
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Mr. Parker is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson be added jointly to the service list. Walmart plans to cause to be filed a motion for Mr. Williamson to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson be added to the official service list as an attorney authorized to accept service of papers in this proceeding.

WHEREFORE, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 
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Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

Dated: December 16, 2014

CERTIFICATE OF SERVICE

I hereby certify that Walmart's December 16, 2014, electronic filing is a true and accurate copy of the Motion to Intervene to be filed in paper medium; and that on December 16, 2014, the electronic filing has been transmitted to the Commission, and that an original and one copy of the filing will be delivered to the Commission, that no participants have been excused from electronic filing at this time, and served upon the following via First Class Mail and Electronic Mail:

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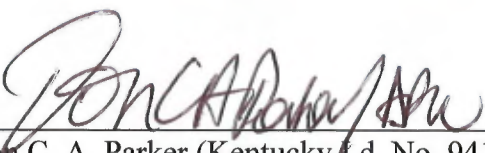
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