

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

IN THE MATTER OF: NOTICE OF INTENT TO FILE :  
APPLICATION FOR A GENERAL ADJUSTMENT IN RATES : Case No. 2015-00312  
USING ELECTRONIC FILING PROCEDURES :

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**MOTION TO INTERVENE OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

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Pursuant to K.R.S. §278.310 and 807 KAR 5:001, Section 4(11), Kentucky Industrial Utility Customers, Inc. (“KIUC”) requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

1. KIUC is an association of the largest electric public utility customers in Kentucky. The purpose of KIUC is to represent the industrial viewpoint on energy and utility issues before this Commission and before all other appropriate governmental bodies.

2. The members of KIUC who purchase electricity from Big Rivers Electric Corporation (“Big Rivers”) through Kenergy Corp. who will participate herein are: Domtar Paper Co., LLC, Kimberly Clark Corporation and Aleris International, Inc.

3. All KIUC member companies have a similar interest in ensuring that the rates charged by Big Rivers to Kenergy for pass-through to retail consumers are just and reasonable.

4. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC members for electricity. Electricity represents a significant cost of doing business for KIUC members. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

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5. The position of KIUC cannot be adequately represented by any existing party. KIUC intends to play a constructive role in the Commission's decision making process herein and KIUC's participation will not unduly prejudice any party.

**WHEREFORE**, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,



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**COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY  
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October 12, 2015