

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

IN THE MATTER OF: :
 : **Case No. 2016-00162**
THE APPLICATION OF COLUMBIA GAS OF :
KENTUCKY, INC. FOR AN ADJUSTMENT OF RATES :

AMENDED
MOTION TO INTERVENE OUT-OF-TIME OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Pursuant to 807 KAR 5:001, Section 4(11) and Section 22, Kentucky Industrial Utility Customers ("KIUC") hereby respectfully move this Commission for an Order permitting it to intervene out-of-time and to be a party to the within proceeding, with full intervention status. In support of its Motion, KIUC states as follows:

(1) KIUC is a group of large manufacturing companies located in the service area of Columbia Gas of Kentucky, Inc. ("Columbia Gas").

(2) The members of KIUC who are ratepayers of Columbia Gas and transport large amounts of gas under various Columbia Gas rates and tariffs and will participate herein are: AK Steel Corporation (Ashland Works) and Toyota Motor Manufacturing, Kentucky, Inc.

(3) This proceeding involves issues which could effect gas transportation costs and availability, capacity costs and availability and other questions of critical importance to KIUC companies.

(4) Therefore, KIUC has a substantial interest in the fairness and reasonableness of the rates and charges proposed by Columbia Gas.

(5) On June 10, 2016 the procedural order was issued in this case declaring June 27, 2016 to be the intervention deadline.

(6) KIUC missed that deadline for various work-related reasons and now asks the Commission for permission to intervene out-of-time.

(7) KIUC states that its intervention will not unduly delay the proceeding and that it is necessary to ensure a full and complete litigation of important ratepayer issues.

(9) Counsel for KIUC in this proceeding and upon whom all notices are to be served are:

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WHEREFORE, KIUC prays that the Commission grant it full intervention status and make it party to the proceeding herein, allow it to appear by counsel for any and all purposes, and to receive filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties.

Respectfully submitted,



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