

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR AN ADJUSTMENT OF	)	CASE NO.
ITS ELECTRIC RATES AND FOR CERTIFICATES	)	2016-00370
OF PUBLIC CONVENIENCE AND NECESSITY	)	

**MOTION TO INTERVENE OF AT&T KENTUCKY**

Pursuant to K.R.S. §278.310, 807 KAR 5:001, Section 4(11), and the procedural schedule set forth in the Commission’s Order of December 13, 2016, AT&T Kentucky,<sup>1</sup> on behalf of itself and affiliated entities, respectfully requests that it be granted full intervenor status in this case and states the following in support its request:

1. AT&T Kentucky is an incumbent local exchange telephone company doing business in the state of Kentucky, and various affiliated entities provide wireline and/or wireless services in Kentucky.
2. The matters being decided by the Commission in this case may have a significant impact on, among other things, the rates, terms, and conditions that apply when AT&T Kentucky and affiliated entities place attachments on or otherwise use poles, ducts, or other facilities of Kentucky Utilities Company.

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<sup>1</sup> BellSouth Telecommunications, LLC d/b/a AT&T Kentucky

3. The attorneys for AT&T Kentucky authorized to represent it in this proceeding and to take service of all documents are:

Cheryl R. Winn  
Waters Law Group, PLLC  
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4. The position of AT&T Kentucky cannot be adequately represented by any existing party. AT&T Kentucky intends to play a constructive role in the Commission's decision-making process in this case, and AT&T Kentucky's participation will not unduly prejudice any party.

WHEREFORE, AT&T Kentucky requests that it be granted full intervenor status in this case.

Respectfully submitted,

/s/ Cheryl Winn  
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**FILING NOTICE AND CERTIFICATE**

The undersigned hereby certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing was transmitted to the Commission on December 22, 2016; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Cheryl R. Winn