

**Commonwealth of Kentucky
Before the Public Service Commission**

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ADJUSTMENT)
OF ITS ELECTRIC RATES AND FOR CERTIFICATES)
OF PUBLIC CONVENIENCE AND NECESSITY)

Case No.
2016- 00370

**KENTUCKY LEAGUE OF CITIES
MOTION TO INTERVENE**

Comes now the Kentucky League of Cities (“KLC”) and pursuant to 807 KAR 5:001, Section 4(11) requests that it be granted intervenor status in the above-captioned proceeding. In support thereof, KLC states as follows:

1. KLC is a nonprofit membership association serving more than 380 Kentucky cities as well as municipal agencies.
2. Members of KLC receiving service from KU, and thus having a stake in the outcome of this case include, but are not limited to, the Cities of Middlesboro, Williamsburg, Corbin, London, Somerset, Columbia, Richmond, Winchester, Mt. Sterling, Flemingsburg, Maysville, Versailles, and Paducah. These cities are representative of the overall membership of KLC.
3. KLC has a special interest in this case that cannot be represented by any other party. While Lexington has previously been granted Intervenor status, KLC’s membership includes a diversity of cities in terms of size, population, infrastructure and geographic location within the Commonwealth. The interests of these cities cannot adequately be represented by Lexington or any other party.

4. The KU street light and traffic light tariffs impact cities throughout the KU territory. As KLC represents the customers paying the majority of revenue generated under these tariffs, KLC and its membership has a particular interest in the rates charged under these tariffs.
5. Proposed changes to rate allocation methods will have a great impact upon KLC's membership's costs and policy decisions. The full extent of that impact cannot be determined without the opportunity to participate fully in this case.
6. KLC's participation in this case is likely to present issues and develop facts that will assist the Commission in fully considering the matter and will not unduly complicate or disrupt the proceeding. KLC intends to participate in every aspect of the case, including offering testimony on the impact of the proposed rate increase on KLC's membership.
7. The attorneys authorized to represent Louisville Metro in this matter and take service of all documents are:

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WHEREFORE, the Kentucky League of Cities moves the Commission to issue an Order granting status as an intervenor party in this action pursuant to 807 KAR 5:001, Section 4(11).

Respectfully submitted,

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