

**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

**MOTION TO INTERVENE OF THE  
KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to K.R.S. § 278.310 and 807 K.A.R 5:001, Section 4(11), the Kentucky Cable Telecommunications Association (“KCTA”) respectfully requests the Public Service Commission to permit it to intervene and become a party in the above-captioned proceeding. In support of its Motion to Intervene (“Motion”), KCTA states as follows:

1. On November 23, 2016, Kentucky Utilities Company (“KU”) filed an Application seeking approval for adjustment of its electric rates, as well as Certificates of Necessity for deployment of Advanced Metering Systems and its Distribution Automation Project and other requests for relief (“Application”).

2. KCTA is a non-profit organization consisting of cable operators serving the majority of cable customers throughout Kentucky. Several KCTA members, including Charter Communications, Inc., attach their facilities to KU’s utility poles, and are directly affected by multiple aspects of KU’s Application. KCTA’s members are directly impacted by KU’s proposed modifications to its pole attachment rates, terms, and conditions, including rates, terms, and conditions related to wireless facilities. KU’s proposed installation of a remote wireless metering system further impacts KCTA’s members’ existing facilities on KU’s poles and their use of excess space on KU’s poles. KCTA members like Charter Communications, Inc. also

purchase significant amounts of electricity from KU, and thus modifications to KU's rates therefore impact the operations of KCTA members.

3. Accordingly, KCTA's members have a direct and substantial interest in the outcome of this proceeding. KCTA's intervention is in lieu of the individual intervention of its affected members. Consequently, KCTA's intervention will promote the timely and efficient progress of this proceeding by reducing the burden on other parties and on the Commission. KCTA's intervention also will allow the interests of KCTA's members to be represented without the burden of each member being required to retain its own counsel, participate individually in the proceedings, and make its own filings. KCTA's participation in this case is likely to present issues and develop facts that will assist the Commission in fully considering the matter.

4. The attorneys representing KCTA in this proceeding are:

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Mr. Zielke and Ms. Theriot are authorized to accept service of papers in this proceeding on behalf of KCTA. KCTA also respectfully requests that Mr. Gillespie, Mr. Werner, and Ms. Ross be added jointly to the service list. KCTA plans to file motions for Mr. Gillespie, Mr. Werner and Ms. Ross to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of those requests, KCTA requests that Mr. Gillespie, Mr. Werner and Ms.

Ross be added to the official service list as attorneys authorized to accept service of papers in this proceeding.

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

Respectfully submitted,

By /s/ Laurence J. Zielke

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**ATTORNEYS FOR THE KENTUCKY CABLE  
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