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
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

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 and gas 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. The members of KIUC who purchase electricity from Kentucky
Utilities Company and who will participate herein are: Clopay Plastic Products Co., Inc., Corning, Inc., Dow
Corning Corporation, Lexmark International, Inc., North American Stainless and Toyota Motor Manufacturing,
Kentucky, Inc. KIUC will supplement the names of additional intervenors when necessary.

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

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
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3. 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,

[Signature]
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October 26, 2016