#### **COMMONWEALTH OF KENTUCKY**

### **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

CASE NO. 2016-00370

### PETITION FOR FULL INTERVENTION OF THE KROGER COMPANY

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 4(11), The Kroger Company ("Kroger") requests that it be granted full intervenor status in the above captioned proceeding and states in support thereof as follows:

1. Kroger operates many retail stores and distribution centers throughout the service area of Kentucky Utilities Company ("KU") and purchases electric energy and gas services for these facilities from KU. Electric and gas services represent a significant cost of doing business for Kroger. Kroger therefore has a special interest in this proceeding in that the Application may have a significant impact on the rates paid by Kroger to KU. The position of Kroger cannot be adequately represented by any existing party. Kroger intends to play a constructive role in the Commission's decision-making process herein and its participation will not unduly prejudice any party.

2. The attorney for Kroger authorized to represent it in this proceeding and to take service of all documents is:

Robert C. Moore, Esq. Stites & Harbison, PLLC 421 West Main Street P.O. Box 634 Frankfort, KY 40602-0634 Phone: (502) 209-1218 Fax: (502) 779-8214 E-mail: rmoore@stites.com WHEREFORE, Kroger requests that it be granted full intervenor status in the above

captioned proceeding.

Respectfully submitted,

Robert C. Moore STITES & HARBISON PLLC 421 West Main Street P.O. Box 634 Frankfort, KY 40602-0634 Telephone: (502) 223-3477 Email: rmoore@stites.com COUNSEL FOR THE KROGER COMPANY

## **CERTIFICATE**

It is hereby certified that the attached Petition for Full Intervention is a true and accurate copy of the document being filed with the Commission in paper medium; that the electronic filing was transmitted to the Commission on November 14, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being hand delivered to the Commission within two (2) business days.

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