

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

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF LOUISVILLE</b>	)	
<b>GAS AND ELECTRIC COMPANY FOR AN</b>	)	
<b>ADJUSTMENT OF ITS ELECTRIC AND GAS</b>	)	<b>CASE NO. 2016-00371</b>
<b>RATES AND FOR CERTIFICATES OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY</b>	)	

**PETITION FOR FULL INTERVENTION BY JBS SWIFT & CO**

Pursuant to 807 KAR 5:001 Section 4(11), JBS Swift & Co ("JBS") requests that it be granted full intervenor status in the above captioned proceeding and states in support thereof the following:

1. Operating since the early 1960s, JBS is a pork processing facility in Louisville Kentucky with 1,200 employees and annual livestock payments of \$440 million. Not only is it the only major pork processing facility in Kentucky, but it supplies pork for both domestic and international customers around the globe.
2. JBS purchases its electric energy and gas services for its facilities from Louisville Gas & Electric Company (LG&E"). Electric and gas services represent a significant cost of doing business for JBS. JBS therefore has a special interest in this proceeding because the Application may have a significant impact on the rates paid by JBS to LG&E. The unique position of JBS cannot be adequately represented by any existing party. JBS intends to

play a constructive role in the Commission's decision making process and its participation will not unduly prejudice any party.

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

Dennis G. Howard, II  
Howard Law PLLC  
740 Emmett Creek Lane  
Lexington, Kentucky 40515  
Telephone: 859.536.0000  
Fax: 859.245.1811  
[dennisghowardii@gmail.com](mailto:dennisghowardii@gmail.com)

WHEREFORE, JBS respectfully requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,



---

Dennis G. Howard, II  
Howard Law PLLC  
740 Emmett Creek Lane  
Lexington, Kentucky 40515  
Telephone: 859.536.0000  
Fax: 859.245.1811  
dennisghowardii@gmail.com  
**COUNSEL FOR JBS SWIFT & CO**

## CERTIFICATE OF SERVICE

I certify 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 December 22, 2016; that there are no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies of the filing in paper medium are being delivered to the Commission within two (2) business days.



---

Dennis G. Howard, II