

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

In the Matter of:

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

Case No.
2016-00371

**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT
MOTION TO INTERVENE**

Comes now the Louisville/Jefferson County Metro Government (“Louisville Metro”) 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, Louisville Metro states as follows:

1. Louisville Metro has a special interest in this case that cannot be represented by any other party. Louisville Metro’s annual LG&E expense is in excess of seventeen million dollars (\$17,000,000,000) per year. This likely makes Louisville Metro one of the largest single customers LG&E serves. The proposed increases to electric and natural gas rates would cost Louisville Metro at least one million dollars (\$1,000,000) in additional utility expense per year.
2. The LG&E street light and traffic light tariffs disproportionately affect Louisville Metro. As the largest, most densely populated area within LG&Es service territory, Louisville Metro provides and pays for the most extensive street light and traffic light infrastructure of any city within LG&E’s service territory. Thus, Louisville Metro has a particular interest in the rates charged under these tariffs.

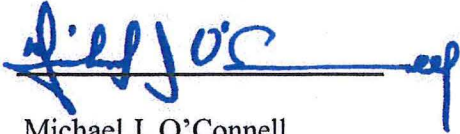
3. Proposed changes to rate allocation methods will have a great impact upon Louisville Metro's costs and policy decisions. Specifically, LG&E's decision to alter the fixed fees is of great interest to Louisville Metro.
4. Louisville Metro's participation in this case is likely to present issues and develop facts that will assist the Commission in fully considering the matter and will not unduly complicate or disrupt the proceeding. Louisville Metro intends to participate in every aspect of the case, including offering testimony on the impact of the proposed rate increase on Louisville Metro.
5. Mike O'Connell, in his capacity as Jefferson County Attorney, has authority to participate in this matter on behalf of Louisville Metro.
6. The attorneys authorized to represent Louisville Metro in this matter and take service of all documents are:

Michael J. O'Connell
Jefferson County Attorney
Brandeis Hall of Justice
600 West Jefferson St., Suite 2086
Louisville, KY 40202
Tel: 502-574-5772
Mike.Oconnell@Louisvilleky.gov

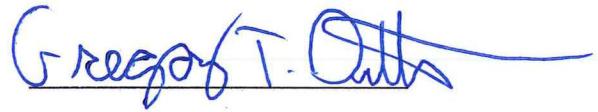
Gregory T. Dutton
Goldberg Simpson, LLC
9301 Dayflower St.
Louisville, KY 40059
Tel: 502-589-4440
GDutton@goldbergsimpson.com

WHEREFORE, Louisville Metro 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,

A handwritten signature in blue ink that reads "Mike O'Connell". The signature is written in a cursive style and is positioned above a horizontal line.

Michael J. O'Connell
Jefferson County Attorney's Office
Brandeis Hall of Justice
600 West Jefferson Street, Suite 2086
Louisville, KY 40202
Telephone: 502-574-5772
Mike.OConnell@louisvilleky.gov

A handwritten signature in blue ink that reads "Gregory T. Dutton". The signature is written in a cursive style and is positioned above a horizontal line.

Gregory T. Dutton
Goldberg Simpson, LLC
9301 Dayflower Street
Prospect, Kentucky 40059
Telephone: 502-589-4440
gduyton@goldbergsimpson.com