Commonwealth of Kentucky
Before the Public Service Commission

In the Matter of:
ELECTRONIC APPLICATION OF LOUISVILLE )
GAS AND ELECTRIC COMPANY FOR AN ) Case No.
ADJUSTMENT OF ITS ELECTRIC AND GAS ) 2016-00371
RATES AND FOR CERTIFICATES OF PUBLIC )
CONVENIENCE AND NECESSITY )

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&E’s 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                                      Gregory T. Dutton
   Jefferson County Attorney                                 Goldberg Simpson, LLC
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   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,

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