

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTONIC APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY FOR AN ADJUSTMENT) CASE NO. 2018-00295
OF ITS ELECTRIC AND GAS RATES)

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

Louisville/Jefferson County Metro Government (“Louisville Metro”), by counsel, hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 4(11) for intervention in the above-styled matter. In support of its motion, Louisville Metro states the following:

Louisville Metro is a consolidated local government established under KRS Chapter 67C. Its address is 527 W. Jefferson Street, Louisville, KY 40202.

The Commission has interpreted KRS 278.040(2) as requiring a person seeking intervention to have an interest in the rates or service of a utility as those are the only matters that are subject to the Commission's jurisdiction. See Order, Kentucky Power Co., Case No. 2017-00179 (Ky. PSC June 19, 2017). Louisville Metro satisfies this requirement because it is a customer of Louisville Gas & Electric (“LG&E”). Louisville Metro pays over \$17,000,000 to LG&E for electrical and gas service.

Administrative regulation 807 KAR 5:001, Section 4(11)(b) states:

The commission shall grant a person leave to intervene if the commission finds that he or she has made a timely motion for intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her

intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.

Louisville Metro meets both these criteria. Louisville Metro has special interests in LG&E's rate case that will not otherwise be adequately represented. First and foremost, as one of LG&E's largest customers that takes service from a variety of rate classifications, no other party could adequately represent the interests of Louisville Metro. Second, and relatedly, Louisville Metro is LG&E's largest customer of Outdoor Lighting classification. Louisville Metro pays more than \$5,000,000 to LG&E on outdoor-lighting and traffic rate codes. Third, LG&E proposes to amend its tariff related to Structure Attachment Charges – Rate PSA, including expanding the availability of the schedule to internal communication network facilities of governmental units. Ultimately, no other party could adequately represent the special interests of Louisville Metro, whether those the interests related to lighting, changes impacting governmental agencies related to pole attachments, or other issues affecting Louisville Metro.

Louisville Metro is also likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. In this particular case, Louisville Metro plans to address issues related to the issues mentioned above, including lighting, and tariff changes to Rate PSA. It anticipates developing facts on the following additional issues: increase in Basic Service Charge, change from a monthly to daily Basic Service Charge, bifurcation of energy charges into infrastructure and variable categories, credits for late payment penalties, return on equity, and others.

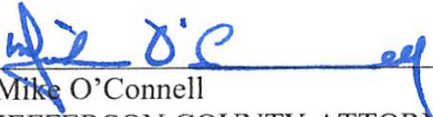
Louisville Metro desires to play a constructive role in this matter and isolate issues that are most important to it. Louisville Metro's focus will serve to neither unduly complicate nor

disrupt the proceeding. Louisville Metro believes that its prior involvement in other cases before the Commission demonstrates its productive standing in the process.


Attorneys for Louisville Metro listed below possess the facilities to receive electronic transmission of all notices and messages related to this proceeding at the electronic mailing addresses listed below. All correspondence to Louisville Metro should be sent to the attorneys' addresses or email addresses listed below.

Accordingly, because Louisville Metro has a special interest in this case that is not otherwise adequately represented and because it is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. Louisville Metro respectfully requests intervention in this proceeding

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the October 26, 2018, electronic filing of this document is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be transmitted to the Commission on October 26, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Petition for Confidential Treatment will be delivered to the Commission within two business days.

A handwritten signature in blue ink, appearing to read "M. J. O'Connell", is written over a horizontal line.

Counsel for Louisville Metro