

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

In the Matter of: ELECTRONIC TARIFF OF KENTUCKY UTILITIES COMPANY OF AN AMENDMENT TO A SPECIAL CONTRACT WITH NORTH AMERICAN STAINLESS, INC.	: : : : :	CASE NO. 2020-00090
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**MOTION TO INTERVENE OF
NORTH AMERICAN STAINLESS, INC.**

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), North American Stainless, Inc. (“NAS”) requests that it be granted full intervenor status in the above-captioned proceeding(s) and states in support thereof as follows:

1. 807 KAR 5:001, Section 4(11)(a)(1) requires that a person requesting leave to intervene as a party to a case before the Kentucky Public Service Commission (“Commission”), by timely motion, must state his or her interest in the case and how intervention 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.
2. 807 KAR 5:001, Section 4(11)(b) provides that 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.
3. On March 9, 2020 Kentucky Utilities Company (“KU”) filed for approval of a special contract with NAS. The contract provides for levelized fuel adjustment charge (“FAC”) billing to NAS, rather than standard FAC billing which changes monthly. Under the special contract, NAS will pay the same fuel costs as it would have paid under the standard FAC. Therefore, the special contract is revenue neutral to KU and to other ratepayers. NAS

seeks levelized FAC billing to assist it with budgeting and financial planning. This is important to NAS since, as KU's largest customer, electricity is a significant cost of production.

4. The matters being decided by the Commission in this case will have a significant impact on the rates paid by NAS for electricity. Electricity represents a significant cost of doing business for NAS. The attorneys for NAS authorized to represent them in this proceeding and to take service of all documents are:

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5. NAS filed a timely motion to intervene in this proceeding.

6. The position of NAS cannot be adequately represented by any existing party. Further, NAS intends to play a constructive role in the Commission's decision-making process.

7. NAS' intervention will not unduly complicate or disrupt the proceedings.

WHEREFORE, North American Stainless, Inc. requests that it be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,



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March 31, 2020