



3. KIUC is an association of the largest electric and gas public utility customers in Kentucky. The purpose of KIUC is to represent the industrial viewpoint on energy and utility issues before this Commission and before all other appropriate governmental bodies. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

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4. KIUC filed a timely motion to intervene in this proceeding.

5. KIUC has a special interest in this case. Several member(s) of KIUC are served by Kentucky Utilities Company (“KU”) and Louisville Gas & Electric Co. (“LG&E”) (collectively, the “Companies”), including AAK USA K2, LLC, Air Liquide Industrial U.S. LP, Alliance Coal, LLC, Carbide Industries LLC, Corning Incorporated, Dow Silicones Corporation, Ford Motor Company, Ingevity, North American Stainless, The Chemours Company FC, LLC and Toyota Motor Manufacturing, Kentucky, Inc.<sup>1</sup>

6. KIUC’s special interest cannot be adequately represented by any existing party. While the Kentucky Attorney General’s Office of Rate Intervention is statutorily charged with representing the interests of “consumers” pursuant to KRS 367.150(8), that duty relates primarily to residential customers. In contrast, KIUC’s interest is exclusively related to large industrial customers, who take service on different rate schedules than residential customers. KIUC and its members are in a unique position to evaluate the impact that the Companies’ Integrated Resource Plan will have on manufacturer energy rates. Changes in industrial rates effect both

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<sup>1</sup> KIUC will supplement the names of additional KIUC member intervenors, if necessary.

KIUC members and the Kentucky economy in general. Accordingly, it is important that large industrial customers are represented in this proceeding.

7. KIUC's intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matters at hand. KIUC has participated in ratemaking matters before this Commission since 1978 and was formally incorporated in 1983. Over the past 30 years alone, KIUC has intervened in approximately one hundred cases addressing electric rate and service issues. In these proceedings, KIUC currently expects to, at minimum, conduct discovery, file expert testimony, and actively participate at the evidentiary hearing. Hence, KIUC will be a helpful and active participant should its request to intervene be granted.
8. KIUC intends to play a constructive role in the Commission's decision-making process.
9. KIUC's intervention will not unduly complicate or disrupt the proceedings.

**WHEREFORE**, KIUC requests that it be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,

/s/ Michael L Kurtz

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