

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

IN THE MATTER OF: ELECTRONIC TARIFF FILING OF KENTUCKY UTILITIES COMPANY FOR APPROVAL OF AN ECONOMIC DEVELOPMENT RIDER SPECIAL CONTRACT WITH BITIKIKY, LLC	: : : :	CASE NO. 2022-00371
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**MOTION TO INTERVENE OF
BITIKI-KY, LLC**

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), Bitiki-KY, LLC (“Bitiki”) 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. Bitiki-KY, LLC (“Bitiki”) is the counterparty to the proposed contract under Commission review in this case. Bitiki is a Delaware limited liability company which plans to invest approximately \$25 million at its existing coal mining operations located in Waverly, Kentucky to build and develop a crypto currency mining facility (“Facility”). The Facility’s load is expected to ramp up from approximately 4 MW to 13 MW at full production and is expected to operate at a 95% load factor. The Facility will be served under Kentucky Utilities Company (“KU”) standard Tariff RTS and KU’s standard economic development Rider (“EDR”). The

Facility is expected to create five new jobs. All electric infrastructure necessary to serve the Facility is already in place and KU will incur no additional investment to serve this new load. KU's very detailed Marginal Cost of Service Study shows that service to the Facility will create positive margins for the Company and will serve to reduce the fixed generation and transmission costs of other customers.

4. Bitiki has a special interest in this proceeding as it is the contracting party with KU. Bitiki's interests cannot be adequately represented by any other party. Because it is the entity that will own and operate the Facility, Bitiki's participation will present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

5. The attorneys for Bitiki authorized to represent them in this proceeding and to take service of all documents are:

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6. Bitiki has filed a timely motion to intervene in this proceeding.

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

Respectfully submitted,

/s/ Michael L Kurtz

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November 10, 2022

COUNSEL FOR BITIKI-KY, LLC