

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. KIUC members are served by Kentucky Power Company (“Kentucky Power” or “Company”). The member(s) of KIUC who will participate herein is: Catlettsburg Refining LLC, a subsidiary of Marathon Petroleum LP.¹

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.

7. The KIUC member seeking to participate in this proceeding will be directly impacted by the proposed special contract. KIUC already explained in detail the proposed special contract structure as well as its potential impact on the base, FAC, and PPA rates of other Kentucky Power consumers in its November 9, 2022 Comments, which were included as Appendix B to the Commission’s November 23, 2022 Order initiating this investigation. KIUC intends to explore those rate impacts in greater detail if allowed to intervene in this proceeding.

¹ KIUC will supplement the names of additional KIUC member intervenors, if necessary.

8. 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 nearly one hundred cases addressing electric rate and service issues. In these proceedings, KIUC currently expects to, at minimum, conduct discovery and actively participate at the evidentiary hearing. Hence, KIUC will be a helpful and active participant should its request to intervene be granted.
9. KIUC intends to play a constructive role in the Commission's decision-making process.
10. 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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