

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

In The Matter Of:	:	
ELECTRONIC TARIFF FILING OF KENTUCKY UTILITIES	:	
COMPANY FOR APPROVAL OF AN ECONOMIC	:	<b>Case No 2022-00395</b>
DEVELOPMENT RIDER SPECIAL CONTRACT WITH	:	
KRUGER PACKAGING	:	

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**MOTION TO INTERVENE OF  
KRUGER PACKAGING (USA), LLC**

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Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), Kruger Packaging (USA), LLC (“Kruger”) requests that it be granted full intervenor status in the above-captioned proceeding 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. Kruger is a Canadian corporation that manufactures publication papers, tissue, lumber and other wood products, corrugated cartons from recycled fibers, green and renewable energy, and wines and spirits. Kruger anticipates investing an estimated \$114 million in a new

production facility located in Elizabethtown, KY, creating over 140 new jobs. The Elizabethtown location would be Kruger's first U.S. production facility. The attorneys for Kruger authorized to represent them in this proceeding and to take service of all documents are:

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4. Kruger filed a timely motion to intervene in this proceeding.
5. Kruger has a special interest in this case given that the subject matter of this proceeding is Kruger's special contract for electric service with Kentucky Utilities Company ("KU").
6. Kruger's special interest cannot be adequately represented by any existing party. Kruger is one of two signatory parties to the special contract at issue, and the only customer representative. Kruger therefore has a unique interest in this matter as compared to other potential intervenors.
7. Kruger will be directly impacted by the Commission's decision with respect to the special contract at issue since the outcome of this proceeding will govern the electric rates that would be paid by the Elizabethtown facility.
8. As one of the signatory parties to the special contract at issue, Kruger's intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matters at hand.
9. Kruger intends to play a constructive role in the Commission's decision-making process.
10. Kruger's intervention will not unduly complicate or disrupt the proceedings.

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

Respectfully submitted,

*/s/ Jody Kyler Cohn*

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**COUNSEL FOR KRUGER PACKAGING  
(USA), LLC**

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