

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

IN THE MATTER OF: APPLICATION OF KENTUCKY UTILITIES COMPANY FOR APPROVAL OF SPECIAL CONTRACT BETWEEN KENTUCKY UTILITIES COMPANY AND BLUEOVAL SK, LLC	: : : : : : :	CASE NO. 2023-00123
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**MOTION TO INTERVENE OF
BLUEOVAL SK, LLC**

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), BlueOval SK, LLC (“BlueOval”) 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. The attorneys for BlueOval authorized to represent it in this proceeding and to take service of all documents are:

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

5. Kentucky Utilities Company (“KU” or “Company”) is seeking approval of a Special Contract between KU and BlueOval for the provision of electric service to support new electric vehicle battery production facilities at the Glendale Megasite located in Hardin County, Kentucky (“Facility”).

6. BlueOval’s decision to locate its manufacturing operations in the Commonwealth of Kentucky was premised upon KU providing the electrical requirements for the Facility under the terms of the Special Contract. BlueOval’s manufacturing operations will consist of two new plants for the manufacture of electric vehicle batteries with an expected combined demand of 260 MW and monthly load factors exceeding 95 percent.

7. BlueOval expects to invest approximately \$5.8 billion at the Facility. Approximately 5,000 direct new high-paying jobs are expected to be created in connection with

the Facility. It is anticipated that thousands of additional indirect jobs will be created as new suppliers locate in Kentucky to serve the Facility, and as local commercial businesses expand to serve the increased population. Local and state tax revenue will significantly increase.

8. Kentucky was one of many states competing for the Facility, and the availability of low-cost, reliable electric service and the option to obtain renewable generation were major considerations in BlueOval's selection of Kentucky.

9. The Special Contract rates and terms were an essential consideration for BlueOval locating the Facility in Company's service territory. BlueOval's load is unique and unlike the load and consumption characteristics of Company's tariffed rate classes on file with the Commission, and therefore does not fit the rate characteristics of any of Company's current rate schedules approved by the Commission.

10. BlueOval intends to play a constructive role in the Commission's decision-making process. BlueOval's participation will assist the Commission in fully considering the reasonableness of the proposed Special Contract. BlueOval has a special interest in this case that cannot be represented by any other party.

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

Respectfully submitted,

/s/ Michael L. Kurtz

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April 18, 2023