

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

IN THE MATTER OF:	:	
	:	
ELECTRONIC APPLICATION OF KENTUCKY UTILITIES	:	CASE NO. 2025-00113
COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC	:	
RATES AND APPROVAL OF CERTAIN REGULATORY	:	
AND ACCOUNTING TREATMENTS	:	
	:	

**MOTION TO INTERVENE OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), Kentucky Industrial Utility Customers, Inc. (“KIUC”) 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. 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 members of KIUC are served by Kentucky Utilities Company (“KU” or “Company”), including Alliance Coal, LLC, Corning Incorporated, Dow Silicones Corporation, North American Stainless, and Toyota Motor Manufacturing, Kentucky, Inc.¹ The \$226.1 million base rate increase (11.5% increase in electric revenues) will significantly impact the competitiveness of KIUC member companies.

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 any proposed changes to industrial rates will have on manufacturers. Changes in industrial rates effect both KIUC members and the Kentucky economy in general. Accordingly, it is important that large industrial customers are represented in this proceeding.

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

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 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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