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JUN 15 2006

PUBLIC SERVICE  
COMMISSION

**Via Overnight Mail**

June 14, 2006

Beth A. O'Donnell, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**Re: Case No. 2006-00172**

Dear Ms. O'Donnell:

Please find enclosed the original and twelve (12) copies of the Petition to Intervene of the St. Elizabeth Medical Center in the above-referenced matter. By copy of this letter, all parties listed on the Certificate of Service have been served.

Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKlew  
Attachment  
cc: Certificate of Service


## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, unless otherwise noted, to all parties on the 14<sup>th</sup> day of June, 2006.

Sandra P. Meyer, President  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
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[spmeyer@duke-energy.com](mailto:spmeyer@duke-energy.com)

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1024 Capital Center Drive  
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Michael L. Kurtz, Esq.

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PUBLIC SERVICE  
COMMISSION

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

In The Matter Of Notice of ULH&P Company dba Duke Energy :  
Kentucky's Intent to File A General Electric Rate Case : Case No.2006-00172

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**PETITION TO INTERVENE OF  
ST. ELIZABETH MEDICAL CENTER**

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Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), St. Elizabeth Medial Center ("St. Elizabeth") requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

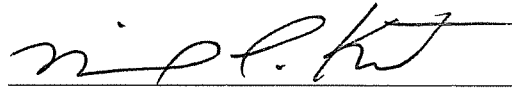
1. St. Elizabeth is one of the largest electric customers of Union Light Heat & Power Company dba Duke Energy Kentucky ("Duke"). St. Elizabeth operates two hospital facilities in the service territory of Duke, has an aggregate load of approximately 6 MW, and consumes more than 30 million kWh per year.
2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by St. Elizabeth for electricity. Electricity represents a significant cost of doing business for St. Elizabeth. The attorneys for St. Elizabeth authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
**BOEHM, KURTZ & LOWRY**  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
Ph: (513) 421-2255 Fax: (513) 421-2764  
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[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

3. The position of St. Elizabeth cannot be adequately represented by any existing party. St. Elizabeth intends to play a constructive role in the Commission's decision-making process herein and St. Elizabeth's participation will not unduly prejudice any party.

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

Respectfully submitted,



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Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

**BOEHM, KURTZ & LOWRY**

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**COUNSEL FOR THE ST. ELIZABETH  
MEDICAL CENTER**

June 14, 2006