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Via Overnight Mail

RECEIVED

June 26, 2012

JUN 27 2012
PUBLIC SERVICE
COMMISSION

Mr. Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: <u>Case No. 2012-00222</u>

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of the PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. filed 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,
Mid C. Ken

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq.

Jody M. Kyler, Eq.

**BOEHM, KURTZ & LOWRY** 

MLKkew Attachment

ce: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy via electronic mail (when available) and by first-class postage prepaid mail, to all parties on the 26<sup>th</sup> day of June, 2012.

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody M. Kyler, Esq.

LONNIE E BELLAR VICE PRESIDENT, STATE REGULATION & RATES LOUISVILLE GAS AND ELECTRIC COMPANY 220 W. MAIN STREET P. O. BOX 32010 LOUISVILLE, KY 40202

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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

:

Application Of Louisville Gas And Electric Company For : Case No. 2012-00222

An Adjustment Of Its Electric And Gas Rates, A Certificate Of Public Convenience And Necessity,

Approval Of Ownership Of Gas Service Lines And Risers,

And A Gas Line Surcharge,

## PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

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

- 1. 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 members of KIUC who purchase electricity from Louisville Gas & Electric ("LG&E") and who will participate herein are: Carbide Industries LLC, Cemex, E.I. DuPont de Nemours and Company, Ford Motor Company, GE Appliances and Lighting and Lonza. KIUC will supplement its Petition with the names of additional participating members as this information becomes known.
- 2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC for electricity. Electricity represents a significant cost of doing business for KIUC. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody M. Kyler, Esq. BOEHM, KURTZ & LOWRY 36 E. Seventh Street, Suite 1510

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jkyler@BKLlawfirm.com

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

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

Respectfully submitted,

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq. Jody M. Kyler, Esq.

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June 26, 2012