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**Via Overnight Mail**

October 16, 2012

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

RECEIVED

OCT 17 2012

PUBLIC SERVICE  
COMMISSION

**Re: Case No. 2012-00445**

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. for filing in the above-referenced docket.

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.


Kurt J. Boehm, Esq.

**BOEHM, KURTZ & LOWRY**

MLKkew  
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 via electronic mail (when available) and regular, U.S. Mail to all parties on this 16<sup>th</sup> day of October, 2012.



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Kurt J. Boehm, Esq.

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RANIE WOHNHAS  
MANAGING DIRECTOR  
KENTUCKY POWER COMPANY  
101A ENTERPRISE DRIVE, P.O. BOX 5190  
FRANKFORT, KENTUCKY 40602

DENNIS G. HOWARD, II. ESQ.  
ASSISTANT ATTORNEY GENERAL'S OFFICE  
1024 CAPITAL CENTER DRIVE, STE 200  
FRANKFORT, KENTUCKY 40601-8204

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

**IN THE MATTER OF: THE APPLICATION OF KENTUCKY POWER :  
COMPANY FOR AN ORDER APPROVING ACCOUNTING PRACTICES :  
TO ESTABLISH REGULATORY ASSETS AND LIABILITIES RELATED TO : Case No. 2012-00445  
THE EXTRAORDINARY EXPENSES INCURRED BY KENTUCKY POWER :  
COMPANY IN CONNECTION WITH FOUR 2012 MAJOR STORM :  
EVENTS :**

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

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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 will participate herein are: Air Liquide Large Industries U.S. LP, AK Steel Corporation, Air Products & Chemicals, Inc., EQT Corporation and Catlettsburg Refining LLC, a subsidiary of Marathon Petroleum LP. KIUC will supplement the names of additional intervenors when necessary.
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.  
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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,



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Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

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**COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY  
CUSTOMERS, INC.**

October 16, 2012