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JUN 25 2013

PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

JOINT APPLICATION OF KENERGY	)	
CORPORATION AND BIG RIVERS ELECTRIC	)	Case No. 2013-00221
CORPORATION FOR APPROVAL OF	)	
CONTRACTS AND FOR A DECLARATORY	)	
ORDER	)	

**MOTION OF JACKSON PURCHASE ENERGY CORPORATION TO INTERVENE**

Now comes Jackson Purchase Energy Corporation (“JPEC”), through counsel, and moves, pursuant to 807 KAR 5:001 Section 3(8) that it be granted full intervention herein. In support of this motion, JPEC state as follows:

1. JPEC is a distribution cooperative and a member of Big Rivers Electric Corporation (“Big Rivers”), the applicant in this proceeding. As a member of Big Rivers, JPEC has an interest in this proceeding because it will be directly affected by the Commission’s rulings and orders herein. The outcome of this case will affect JPEC’s members, tariffs and relationship with Big Rivers.
2. JPEC’s address is 2900 Irvin Cobb Drive, Paducah, Kentucky 42002. JPEC’s mailing address is P.O. Box 3188, Paducah, Kentucky 42002-3188.
3. JPEC should be permitted to intervene because its interest is not otherwise adequately represented by any other party. Further, JPEC’s intervention will likely present issues or develop facts that assist the Commission in full considering the matter without unduly complicating or disrupting the proceedings and without prejudice to any other party.

4. If the JPEC is granted full intervention, service of all documents required to be served on the parties should be made on the following persons:

- Kelly Nuckols  
President & CEO  
Jackson Purchase Energy Corporation  
2900 Irvin Cobb Drive  
Paducah, Kentucky 42001  
or  
PO Box 3188  
Paducah, Kentucky 42002-3188
- Melissa Yates  
Counsel for Jackson Purchase Energy Corporation  
555 Jefferson Street  
Suite 301  
Paducah, Kentucky 42001  
Fax (270) 442-6000

WHEREFORE, JPEC moves to be granted full intervention and it be afforded any and all relief to which it may appear entitled.

Respectfully submitted,

DENTON & KEULER  
P.O. BOX 929  
PADUCAH, KY 42002-0929  
Telephone: (270) 443-8253  
Facsimile: (270) 442-6000

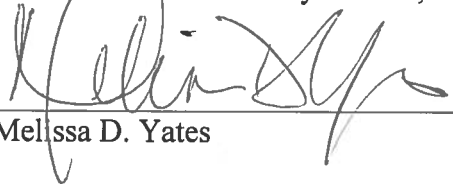
By: 

Melissa D. Yates

ATTORNEYS FOR JACKSON  
PURCHASE ENERGY CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify the foregoing was filed with the Public Service Commission by via Federal Express and copies were served via regular mail on the persons named in the attached service list by mailing true and correct copies of the same this the 24th day of June, 2013.

  
\_\_\_\_\_  
Melissa D. Yates

## **SERVICE LIST**

JPEC re Joint Application of Kenergy Corporation and Big Rivers  
Electric Corporation for Approval of Contracts and for a Declaratory Order

Case No. 2013-00221

MARK A BAILEY  
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