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RECEIVED

FEB 10 2014

**PUBLIC SERVICE
COMMISSION**

Via Overnight Mail

February 7, 2014

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

Re: Case No. 2014-00003

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC's PETITION TO INTERVENE 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.

Jody Kyler Cohn, Esq.

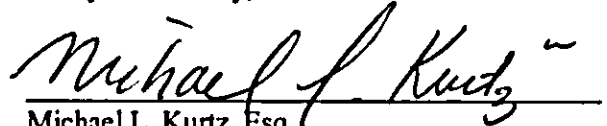
BOEHM, KURTZ & LOWRY

MLKkew
Attachment

cc: Certificate of Service
Quang Nyugen, Esq.

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 7th day of February, 2014.


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Louisville, KENTUCKY 40202

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

RECEIVED

FEB 10 2014

**PUBLIC SERVICE
COMMISSION**

In The Matter Of: :
: **Case No. 2014-00003**
Joint Application Of Louisville Gas & Electric :
Company And Kentucky Utilities Company For :
Review, Modification, and Continuation of Existing, :
and Addition of New, Demand-Side Management :
and Energy Efficiency Programs. :

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

Pursuant to K.R.S. §278.310 and 807 KAR 5:001, Section 4(11), 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 Kentucky Utilities Company ("KU") and Louisville Gas & Electric Company ("LG&E") and who will participate herein are: AAK, USA K2, LLC, Carbide Industries LLC, Cemex, Clopay Plastic Products Company, Corning Incorporated, Dow Corning Corporation, E.I. duPont de Nemours and Company, Ford Motor Company, Lexmark International, Inc., MeadWestvaco, NewPage Corp., North American Stainless, Schneider Electric USA and Toyota Motor Manufacturing Kentucky, Inc. 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:

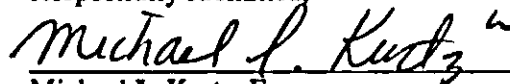
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3. The position of KIUC cannot be adequately represented by any existing party. KIUC intends to play a constructive role in the Commission's decision making process herein and KIUC's participation will not unduly prejudice any party.

4. Although the Commission issued an Order on January 30, 2014 establishing the deadline for requests for intervention in this proceeding as February 5, 2014, KIUC submits that good cause exists to grant its Motion to Intervene. Due to the press of business and the impacts of the recent cold weather on typical business hours, KIUC was unable to submit a Motion to Intervene by February 5, 2014. However, counsel for KIUC has spoken with counsel for the Applicants regarding this request for intervention out-of-time. Counsel for the Applicants stated that the Applicants do not object to KIUC's intervention out-of-time. In addition, KIUC's intervention will not prejudice other parties to this proceeding since KIUC will accept the current record as it stands.

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

Respectfully submitted,



Michael L. Kurtz, Esq.
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Jody Kyler Cohn, Esq.
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**COUNSEL FOR KENTUCKY INDUSTRIAL
UTILITY CUSTOMERS, INC.**

February 7, 2014