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a PPL company

Justin M. McNeil
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601-8294

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OCT 5 2026

**PUBLIC SERVICE
COMMISSION**

October 5, 2026

**RE: Joseph and Melissa Mahan (Complainants) v. Cumberland Valley Electric (Defendant)
Case No. 2026-00236**

Dear Mr. McNeil:

Please accept for filing Kentucky Utilities Company's Request for Intervention in the above referenced case.

Should you have any questions regarding the enclosed, please do not hesitate to contact me.

Sincerely,

Rick E. Lovekamp

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

In the Matter of:

JOSEPH AND MELISSA MAHAN	)	
	)	
COMPLAINANTS	)	
	)	
v.	)	CASE NO. 2026-00236
	)	
CUMBERLAND VALLEY ELECTRIC	)	
	)	
DEFENDANT	)	
	)	

MOTION TO INTERVENE OF KENTUCKY UTILITIES COMPANY

Pursuant to 807 KAR 5:001 Section 4(11) and K.R.S. §§ 278.310, 278.040(2), Kentucky Utilities Company ("KU"), by its attorneys, respectfully requests that the Kentucky Public Service Commission ("Commission") permit it to intervene and become a party in the above-captioned matter. In support of its Motion to Intervene, KU states as follows:

1. On August 20, 2026, Joseph and Melissa Mahan (the “Mahans”) filed a Complaint (the “Complaint”) against Cumberland Valley Electric (“CVE”). CVE filed a Verified Answer and Motion to Transfer Service Connection on September 2, 2026. (“Answer”). The Mahans filed a Motion for Leave to File Response and Response in Opposition to Cumberland Valley Electric Inc.’s Motion. (“Response”).

2. In the Complaint, the Mahans allege, among other things, that KU stated it would service the Mahan’s residence via a phone call, that CVE would not permit KU to provide electric service, and that KU has agreed to provide electric to the Mahans but has said that CVE will not allow them to do so. *See* Complaint.

3. In its Answer, CVE states, among other things, that there is no territorial dispute between CVE and KU and that KU agrees that the Mahan's residence is located in CVE's Cumberland certified territory and that CVE has the exclusive right to serve the residence. *See Answer.*

4. In their response, the Mahans state, among other things, that "the Commission should require KU to state its position in the record [...]." *See Response.*

5. Under 807 KAR 5:001, Section 4(11)(b), the Commission shall grant leave to intervene if it finds that "a timely motion for intervention" was made, that the party seeking intervention has "a special interest in the case that is not otherwise adequately represented," or that "intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly disrupting the proceedings."

6. KU's request for leave to intervene is timely filed as it precedes any deadline for intervention being set by the Commission.

7. KU has a special interest that is not adequately represented in this case as KU is directly named in the Complaint and various representations were made both by the Mahans and CVE regarding what KU did and what KU is willing to do with respect to electric service at the Mahan's property. KU has an interest in presenting to the Commission the facts and circumstances surrounding its involvement with electric service to be provided to the Mahans. In fact, this is exactly what the Mahans requested in their Response. This interest cannot be represented by CVE or any other party in this proceeding.

8. As the Mahans and CVE recognize, KU is likely to present issues or to develop facts to assist the Commission in considering the Mahan's Complaint, including but not limited to, those discussed below:

a. KU learned earlier this year that it is inadvertently serving outside of its territory by providing electric service to the Mahans' garage located on the property at 688 Lynn Camp Church Rd., Corbin, KY 40701 ("Mahan Property"). This was due to KU's system mistakenly not being updated to properly reflect its boundary line in the area with CVE after a prior redrawing of the boundary line.

b. KU expressly recognizes that the Mahan Property, including the garage, is in CVE's service territory.

c. KU engaged CVE to collaborate regarding a resolution to possibly adjust territory boundaries to allow KU to provide electric service to the Mahan Property.

d. CVE indicated that it intends to serve the Mahan Property and is not willing to agree to a territorial change.

e. KU has informed the Mahans and CVE that it intends to transition service of the Mahan Property to CVE as soon as possible.

f. KU is in the process of working with CVE to transition the Mahans' service but the Mahans need to request service from CVE to begin the transition.

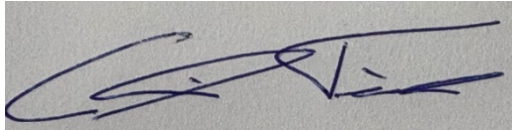
g. Until that transfer can occur and to ensure that there is no interruption in service, KU will continue to serve the Mahans' garage on a temporary basis until the transition can be completed or it is told to do otherwise by the Commission.

7. KU intends to play a constructive role in the Commission's decision-making process. KU will not unduly complicate or disrupt the proceedings.

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

Dated: October 5, 2026

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'S. Judd', is written over a light gray background.

Sara V. Judd
Assistant General Counsel
Christopher C. Tieke
Counsel

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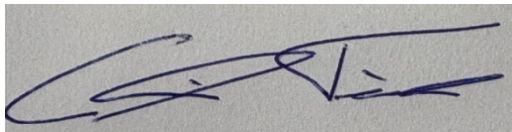
CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the filing has been transmitted to the Commission on October 5, 2026. Additionally, a true and accurate copy of the foregoing was placed in the U.S. Mail, postage prepaid, on October 5, 2026 to the following:

Joseph and Melissa Mahan
688 Lynn Camp Church Rd.
Corbin, KY 40701

Adam Towe
303 S. Main Street
London, KY 40741

Edward Depp
101 South Fifth Street, Suite 2500
Louisville, KY 40202



Christopher C. Tieke
Counsel

Counsel for Kentucky Utilities Company