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IRIS G. SKIDMORE

Via Hand-Delivery

June 3, 2011

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

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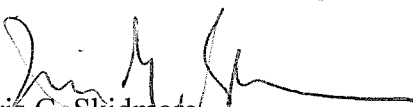
PUBLIC SERVICE
COMMISSION

**Re: Case No. 2011-00161 - The Application of Kentucky Utilities Company for
Certificates of Public Convenience and Necessity and Approval of its 2011
Compliance Plan for Recovery by Environmental Surcharge**

Dear Mr. Derouen:

Enclosed for filing in the above styled action are an original and ten copies of the Motion for Full Intervention on behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.

Sincerely,


Iris G. Skidmore

Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR CERTIFICATES OF PUBLIC) Case No. 2011-00161
CONVENIENCE AND NECESSITY AND APPROVAL)
OF ITS 2011 COMPLIANCE PLAN FOR RECOVERY)
BY ENVIRONMENTAL SURCHARGE)

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PUBLIC SERVICE
COMMISSION

MOTION FOR FULL INTERVENTION

* * * * *

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 3(8) moves that it be granted leave to intervene in this matter and that it be granted full intervention.

In this matter the Commission will examine Kentucky Utilities Company's application for environmental cost recovery. Any increase in electric bills that may result from this application will adversely impact the low-income population served by CAC.

CAC, whose address is P.O. Box 11610, Lexington, KY 40576, is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents in the KU service area. CAC has partnered with KU in programs to assist its low income customers, beginning with the WinterCare Energy Fund, which was established in 1983. CAC has provided administrative services, financial management and marketing support for the Fund since its inception. CAC also implemented and administers the Kentucky Utilities Home Energy Assistance (HEA) Program, which serves KU customers by providing monthly subsidies throughout the winter and summer peak usage months. CAC serves as the lead agency in a partnership of community action agencies that provide intakes and energy audits for KU's We Care demand side management program.


In addition, CAC has frequently intervened in KU rate and demand-side management cases before the Commission. In those cases, CAC has advocated for lower rates and programs that provide assistance for low-income customers and which encourage energy efficiency and conservation.

Because CAC is the primary advocate for low income customers in KU's service area, it has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. The low income customers are the most vulnerable to increases in electric bills. CAC's interests are not adequately represented by the other parties to this proceeding. CAC will present issues and develop facts that will be helpful to the Commission in fully hearing all issues relevant to this application, and participation by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

CAC expects to present the testimony of Jack E. Burch, Executive Director of CAC, and may choose to present testimony of other witnesses not yet identified.

WHEREFORE, CAC requests that it be granted leave for full intervention and that it be certified as a full party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross-examine witnesses, and be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties or orders of the Commission.

Respectfully submitted,



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COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2011, a true and accurate copy of the foregoing Motion for Full Intervention was served by United States mail, postage prepaid, to the following:

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