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July 31, 2007

Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RECEIVED

AUG - 1 2007

PUBLIC SERVICE
COMMISSION

Re: **Community Action Council's Motion for Full Intervention**
Public Service Commission, Case No. 2007-00319

Dear Ms. O'Donnell:

At the request of Joe Childers, I am enclosing an original and ten copies of Community Action Council's **Motion for Full Intervention** in the above-referenced matter. Also enclosed is an extra copy to "date-stamp" and return to me for our file. A postage-paid envelope is enclosed for that purpose.

Thank you for your assistance. Please call me at (859) 259-1900, ext. 33 if you have questions regarding the enclosed.

Sincerely,



Patricia Pruitt
Secretary to Joe F. Childers, Esq.

Enclosures

cc: Jack Burch, Community Action Council (w/encl.)
Charles Lanter, Community Action Council (w/encl.)

tmp/letters/CAC/ltr Beth O'Donnell

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG - 1 2007

PUBLIC SERVICE
COMMISSION

In the Matter of:

THE JOINT APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY AND)
KENTUCKY UTILITIES COMPANY DEMAND-)
SIDE MANAGEMENT FOR THE REVIEW,)
MODIFICATION, AND CONTINUATION OF)
ENERGY EFFICIENT PROGRAMS AND DSM)
COST RECOVERY MECHANISMS)
BROWNFIELD DEVELOPMENT RIDER)

CASE NO. 2007-00319

MOTION FOR FULL INTERVENTION

Come now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), P.O. Box 11610, Lexington, KY 40576, by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby move for leave to intervene as a full party in the above-referenced proceeding. In support of this motion, CAC states as follows:

1. CAC 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 of Kentucky Utilities Company's service territory. As such, it is likely to present issues and provide a perspective which is not likely to be presented by the other parties to this proceeding, and its interests are not adequately represented by other parties to this proceeding. CAC's participation will not unduly delay these proceedings.
2. In this proceeding, the Commission will examine the request by Kentucky

Utilities Company for approval of a low-income weatherization proposal, which if approved as requested could have a significant impact on the low-income clients served by CAC.

3. CAC expects to present testimony from Jack E. Burch, Executive Director. Additionally, CAC may choose to present testimony from other witnesses not yet identified.
4. The intervention of CAC into this action is likely to present issues and facts that will not be adequately addressed or represented by any other party and will be helpful to the Commission in fully considering the matters without unduly complicating or disrupting this proceeding.
5. CAC respectfully requests that it be granted leave for full intervention and to participate fully as a party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine witnesses, present argument and file briefs as allowed by the Commission.



JOE F. CHILDERS

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**ATTORNEY FOR COMMUNITY
ACTION COUNCIL FOR
LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS
COUNTIES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the following persons by United States mail:

Allyson K. Sturgeon, Esq.
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Kent W. Blake
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Dennis Howard, II, Esq.
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Michael L. Kurtz, Esq.
Boehm, Kurtz, & Lowry
36 East Seventh Street
Suite 2110
Cincinnati, Ohio 45202

on this the 31st day of July, 2007.



JOE F. CHILDERS