

# GETTY & CHILDERS PLLC

ATTORNEYS AT LAW

1900 Lexington Financial Center  
250 West Main Street  
Lexington, Kentucky 40507  
Telephone: (859) 259-1900  
Facsimile: (859) 259-1909

Patricia M. Pruitt, Secretary  
Extension 33  
E-Mail: [tpruitt@gettychilders.com](mailto:tpruitt@gettychilders.com)

Via dello Studio  
No. 8  
50122 Florence, Italy  
Telephone: 011-39-055-290-394  
Facsimile: 011-39-055-267-8800

August 8, 2007

**RECEIVED**

AUG 09 2007

**PUBLIC SERVICE  
COMMISSION**

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

Re: **Kentucky Association for Community Action, Inc. ("KACA")'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 the Kentucky Association for Community Action, Inc. ("KACA")'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.)

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

**RECEIVED**  
AUG 09 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

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**MOTION FOR FULL INTERVENTION**

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Comes now the Kentucky Association for Community Action, Inc. (KACA), 101 Burch Court, Frankfort, KY 40601, by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby moves for leave to intervene as a full party in the above-referenced proceeding. In support of this motion, KACA states as follows:

1. KACA is a Kentucky non-profit, 501(c)(3) public interest corporation which represents Kentucky's twenty three (23) Community Action Agencies. KACA operates the Low Income Home Energy Assistance Program (LIHEAP) in all 120 Kentucky counties and provides assistance to 150,000 low income households in the state each year. KACA also provides technical assistance on an on-going basis to the state's four Demand-Side Management (DSM) Programs operated by American Electric Power, Louisville Gas and Electric Company, Union Light Heat and Power, and Western Kentucky Gas. These programs provide a variety of conservation services for low income households.

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 KACA and the twenty three (23) community action agencies which are members of KACA.
4. KACA expects to present testimony from Kip Bowmar, Executive Director. Additionally, KACA may choose to present testimony from other witnesses not yet identified.
5. The intervention of KACA 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.
6. KACA 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.

  
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JOE F. CHILDERS

GETTY & CHILDERS, PLLC  
1900 Lexington Financial Center  
250 West Main Street  
Lexington, KY. 40507  
(859) 259-1900

**ATTORNEY FOR KENTUCKY  
ASSOCIATION FOR COMMUNITY**

**ACTION, 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.  
Corporate Counsel  
E.ON U.S. Services, Inc.  
220 West Main Street  
Louisville, Kentucky 40202

Kent W. Blake  
Vice President State Regulation and Rates  
E.ON U.S. Services, Inc.  
220 West Main Street  
Louisville, Kentucky 40202

Dennis Howard, II, Esq.  
Paul D. Adams, Esq.  
Assistant Attorneys General  
1024 Capital Center Drive  
Suite 200  
Frankfort, Kentucky 40601-8204

Michael L. Kurtz, Esq.  
Boehm, Kurtz, & Lowry  
36 East Seventh Street  
Suite 2110  
Cincinnati, Ohio 45202

on this the 8th day of August, 2007.

  
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JOE F. CHILDERS