



SEC

STAND ENERGY CORPORATION

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RECEIVED

JUN 14 2012

PUBLIC SERVICE
COMMISSION

June 12, 2012

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

**Re: Louisville Gas & Electric Rate Case
No. 2012-00222 – Motion For Full Intervention**

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter with the Commission are the original and ten (10) copies of Stand Energy Corporation's Motion For Full Intervention in the above-captioned case.

This Motion was inadvertently filed via U.S. Mail by transmittal dated June 11, 2012 to the Commission and anticipated parties. The June 11 Motion had the incorrect case number (2012-00136 instead of 2012-00222). This Motion and Memorandum replaces that incorrect filing.

Thank you for your prompt attention to this request.

Sincerely,

John M. Dosker
General Counsel

Encls.

cc: Mssrs Riggs, Bellar, Cook, Howard II.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

THE APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR AN ADJUSTMENT)	
OF ITS ELECTRIC AND GAS RATES; A)	
CERTIFICATE OF PUBLIC CONVEIENCE AND)	CASE NO. 2012-00222
NECESSITY; APPROVAL OF OWNERSHIP OF)	
GAS SERVICE LINES AND RISERS;)	
AND A GAS LINE SURCHARGE.)	

**MOTION OF STAND ENERGY CORPORATION
FOR FULL INTERVENTION**

Pursuant to KRS 278.310 and 807 KAR 5:001 §3(8), Stand Energy Corporation ("Stand Energy") moves the Kentucky Public Service Commission for full intervenor status in the above-named and numbered action. A memorandum in support of this motion is filed herewith and attached hereto.

Respectfully Submitted,


JOHN M. DOSKER (KBA #82089)
GENERAL COUNSEL
Stand Energy Corporation
1077 Celestial Street, Suite #110
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CERTIFICATE OF SERVICE

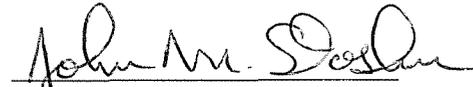
I hereby certify that the foregoing was mailed, first class postage prepaid, this 13th day of

June 2012, to the following parties of record:

Kendrick R. Riggs, Esq.
Stoll, Keenon, Ogden
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828

Lonnie E. Bellar
Louisville Gas & Electric Company
State Regulations and Rates
220 West Main Street
P.O. Box 32010
Louisville, Kentucky 40232

Dennis Howard, II, Esq.
Lawrence W. Cook, Esq.
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204


JOHN M. DOSKER

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**MEMORANDUM SUPPORTING MOTION OF
STAND ENERGY CORPORATION FOR FULL INTERVENTION**

Stand Energy Corporation submits the following Memorandum in support of the Motion to Intervene. Stand Energy has differing commercial goals and direction than Louisville Gas & Electric Company (hereinafter "LG&E"), the Kentucky Attorney General, or any other party or prospective party in the above-captioned case. Therefore, no other participant can or will adequately represent or protect the interests of Stand Energy Corporation or its customers behind LG&E in this proceeding.

Stand Energy's participation in this proceeding will lead to the presentation of relevant facts and issues that will assist the Kentucky Public Service Commission in its consideration of the matters raised herein without unduly complicating, disrupting or delaying the proceedings. Stand Energy is a private gas marketer and Kentucky corporation with its offices located at 1077 Celestial Street, Rookwood Building 3, Suite 110, Cincinnati, Ohio 45202-1629.

Stand Energy is engaged in the marketing of natural gas to a unique blend of public and private customers in over 13 states (including Kentucky), with experience delivering natural gas

behind more than 33 local distribution companies (including, but not limited to customers behind LG&E). Stand Energy has absolutely no connection to any regulated utility in any state.

The undersigned General Counsel has been licensed to practice law in Kentucky for 25 years since 1987, has appeared before the Commission in past proceedings, and is a former member of the Executive Committee of the North American Energy Standards Board (NAESB), Gas Supplier Segment. Stand Energy has almost twenty-eight (28) years of experience in federal and state regulatory proceedings involving natural gas.

The filing by LG&E proposes to adjust the rates of all classes of service within the LG&E system: residential, small non-residential, large non-residential and interruptible service customers. As such, it is appropriate for LG&E and the Commission to consider proposals to adjust the volumetric threshold requirements for customers to transport natural gas on the LG&E system which was one of the topics of Case No. 2010-00146, *An Investigation of Natural Gas*

Retail Competition Programs:

As for expanded transportation services to commercial and industrial consumers, and governmental and other public entities that do not currently qualify for existing transportation services, the Commission finds it appropriate to encourage Atmos, Delta, Duke Kentucky and LG&E to evaluate their existing transportation tariffs with the context of the operation of their distribution systems and the maintenance of system integrity. *The EIA data on marketer and LDC prices for commercial customers, reflects that the average marketer price was lower than the average LDC price in the majority (sic*) of states.* See Appendix C. Therefore, the Commission will review the reasonableness of the existing transportation tariffs of each of the above-named LDC's and any proposed changes in rate design and product and service availability in their next general rate proceeding. (p. 16, Emphasis Added)

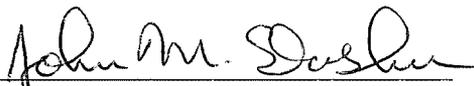
*Exhibit C, *Consumer Prices Table 24* from a 2008 EIA Report lists 9 "selected states" Florida, Georgia, Maryland, Michigan, New York, Ohio, Pennsylvania, Virginia and the District of Columbia. Of these 9 states **only** in Georgia was the marketer price higher for commercial

customers than the LDC price. **In the other 8 states (8 out of 9) the marketer price was lowest for commercial customers.**

Stand Energy proposes that LG&E and the Commission should use this opportunity in this proceeding to expand eligibility for its Gas Transportation programs for commercial, industrial, governmental and other public entities by establishing lower volumetric thresholds for customers to transport gas. Stand Energy is not advocating or suggesting any kind of residential gas transportation program in this proceeding.

WHEREFORE, Stand Energy Corporation respectfully requests that the Commission grant it full Intervenor status.

Respectfully Submitted,


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