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PUBLIC SERVICE
COMMISSION

Via Hand-Delivery

October 10, 2012

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

RECEIVED

OCT 10 2012

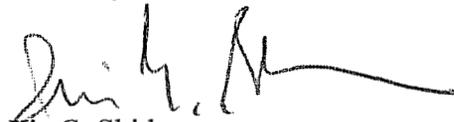
PUBLIC SERVICE
COMMISSION

**Re: Case No. 2012-00428: Consideration of the Implementation of Smart Grid
and Smart Meter Technologies**

Dear Mr. Derouen:

Enclosed for filing in the above styled action are an original and ten copies of 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:

CONSIDERATION OF THE IMPLEMENTATION)
OF SMART GRID AND SMART METER)
TECHNOLOGIES)

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CASE NO. SERVICE
2012-00428 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.

By Order entered October 1, 2012, the Commission has initiated an administrative proceeding to consider implementation of Smart Grid and Smart Meter technologies and time-of-use pricing. These issues will impact low-income persons, and CAC has an interest in assuring that the interests of low-income persons are considered in moving forward with these technologies. CAC is interested in assuring that low-income persons will equally benefit from these technologies and that costs are minimal or can be offset by assistance or subsidies. CAC urges that its voice is necessary for the Commission's full consideration of these issues.

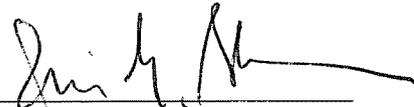
In its Order establishing this administrative proceeding, the Commission has invited those persons granted intervention in Case No. 2008-00408 to request intervention in this case. CAC was a party in Case No. 2008-00408 and filed joint comments in that case with the Attorney General of Kentucky

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 its four core counties in the Kentucky Utilities

Company and Columbia Gas of Kentucky service areas. CAC also provides services in other Kentucky counties and administers the WinterCare Energy Fund providing services across most of the state. CAC has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. 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 this matter, and participation by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

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,

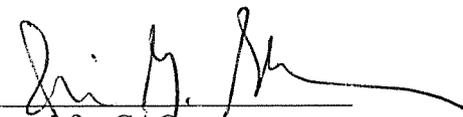


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COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2012, a true and accurate copy of the foregoing Motion for Full Intervention was served by United States mail, postage prepaid, to the persons on the attached service list: ,


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