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AUG 5 2004

PUBLIC SERVICE COMMISSION

## COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

JOINT APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY, METRO HUMAN NEEDS ALLIANCE, PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM AND KENTUCKY ASSOCIATION FOR COMMUNITY ACTION FOR THE ESTABLISHMENT OF A HOME ENERGY ASSISTANCE PROGRAM

CASE 2004 - 00304

## REQUEST OF ROBERT L. MADISON FOR FULL INTERVENTION

I REQUEST FULL INTERVENTION IN PSC CASE NO. 2003-00304, WHICH CONCERNS THE ESTABLISHMENT OF A HOME ENERGY ASSISTANCE PROGRAM (HEA) IN THE LOUISVILLE GAS AND ELECTRIC SERVICE TERRITORY.

I AM AN ELECTRIC ONLY RESIDENTIAL CUSTOMER OF LG&E. I HAVE BEEN PREVIOUSLY GRANTED FULL INTERVENTION IN THE FOLLOWING PSC CASES:

- 1. 98-426 PBR.
- 2 2000-095 POWERGEN MERGER.
- 3. 2000-080 GAS INCREASE.
- 4 .2000-386 POLLUTION EQUIPMENT.
- 5. 2001-104 E.ON.
- 6. ADMINISTRATIVE 387 KY ADEQUACY OF GENERATION & TRANSMISSION.
- 7. 2001-323 HOME ENERGY ASSISTANCE.
- 8. 2002-00147 POLLUTION EQUIPMENT.
- 9. 2004-00029 ACQUISITION OF OLDHAM COUNTY SEWER DISTRICT.

IN ACCORDANCE WITH 807 KAR 5:0001 (3) (8),I FEEL THAT I HAVE A SPECIAL INTEREST IN THIS PROCEEDING WHICH IS NOT OTHERWISE ADEQUATELY REPRESENTED AND / OR THAT I AM LIKELY TO PRESENT ISSUES OR DEVELOP FACTS THAT WILL ASSIST THE PSC WITHOUT COMPLICATING OR DISRUPTING THE PROCEEDINGS.

I WAS GRANTED FULL INTERVENTION IN CASE 2001 - 323. THE CURRENT CASE IS A CONTINUATION OF THE PREVIOUS CASE. MANY OF THE ISSUES & RECOMMENDATIONS THAT I MADE IN THE PREVIOUS CASE WERE APPROVED BY THE PSC. THE ATTORNEY GENERAL (AG) CAN NOT REPRESENT MANY OF THE SPECIFIC ISSUES THAT I AND OTHERS (FROM PUBLIC COMMENT) HAVE RAISED IN THE PREVIOUS CASE BECAUSE OF THE AG'S CONSISTENT ADVOCACY OF LOW INCOME POSITIONS. THERE ARE

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OTHER POINTS OF VIEWS THAT NEED TO BE HEARD.

IN PREVIOUS PSC CASES I HAVE PARTICIPATED IN DATA REQUESTS, PRESENTED WRITTEN AND ORAL TESTIMONY, ASKED QUESTIONS AT THE HEARINGS AND FILED BRIEFS.

I CERTIFY THAT ON 03 AUG 2004, COPIES OF THIS LETTER WERE MAILED CERTIFIED TO THE PSC, REGULAR MAIL TO ALL OTHER PARTIES OF RECORD.

SINCERELY.

ROBERT L. MADISON 5407 BAYWOOD DRIVE LOUISVILLE KY 40241-1318

HOME PHONE: (502) 241-5079