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**PUBLIC SERVICE
COMMISSION**

February 12, 2007

PUBLIC SERVICE COMMISSION

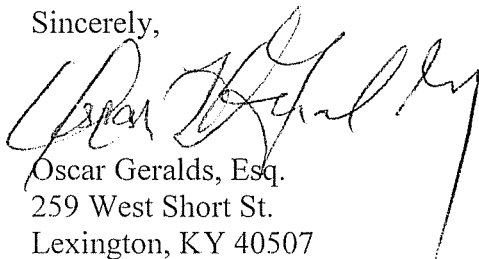
Beth A. O'Donnell, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2006-00472

Dear Ms. O'Donnell:

Please find enclosed the original and twelve copies of Petition to Intervene of the Cumberland Chapter of the Sierra Club filed in the above-referenced matter. By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document on file.

Sincerely,



Oscar Geraldts, Esq.
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Certificate of Service

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 12th day of February, 2007.

Hon. Dennis Howard
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Honorable Michael L. Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202-4434

Honorable Charles A. Lile
Senior Corporate Counsel
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P.O. Box 707
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John J. Scott, Counsel
for Nolin Rural Electric Cooperative Corporation
Whitlow and Scott
108 E. Poplar St., P.O. Box 389
Elizabethtown, KY 42702-0389



Oscar H. Gerald, Esq.

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**PUBLIC SERVICE
COMMISSION**

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF: GENERAL ADJUSTMENT)
OF ELECTRIC RATES OF EAST KENTUCKY)
POWER COOPERATIVE, INC.)

Case No. 2006-00472

**PETITION TO INTERVENE OF
CUMBERLAND CHAPTER OF SIERRA CLUB**

Pursuant to KRS 278.310 and 807 KAR 5:001 Section 3(8), the Cumberland Chapter of the Sierra Club (“Sierra”) requests that it be granted full intervenor status in the above-captioned proceeding and states its support thereof as follows:

1. The Sierra Club is America’s oldest, largest and most influential grassroots environmental organization, with 700,000 members nationwide and chapters in all 50 states. One of the organization’s critical missions is “to practice and promote the responsible use of the earth’s ecosystems and resources.” In recent years Sierra has focused increasing attention and expended significant resources on energy-related issues such as global warming, energy efficiency, and renewable energy technologies. Sierra’s newly-approved national energy strategy calls for a gradual transition from a dependence on environmentally damaging fuels such as coal to a more energy-efficient economy with increasing contributions from cleaner renewable resources.
2. The environmental impacts of coal-fired power plants are massive. Burning coal in Kentucky’s power plants contributes to some of the worst air pollution in the

Midwest. Louisville and Northern Kentucky have some of the highest rates of respiratory disease, including childhood asthma, of any metropolitan area in the region. Mercury pollution from coal-burning power plants is a significant health problem, especially for fetuses and young children. In addition, the carbon dioxide released to the atmosphere when coal is burned contributes to global warming. Many of the people directly affected by these environmental impacts are Sierra Club members and customers of EKPC's member co-ops.

3. Although general rate cases usually focus primarily on issues such as the revenue requirement, cost allocation, and the distribution of revenues among major customer classes, the Commission also routinely determines the utility's rate structures via rate cases. The rate structures, as embodied in Commission-approved tariffs, establish the incentives that will be faced by the generation and transmission utility, East Kentucky Power Cooperative, Inc. (EKPC), the utility's sixteen affiliated rural electric cooperatives, and the retail customers of those member co-ops. These incentive structures in turn directly affect the willingness of the economically affected parties to invest in energy efficiency programs to reduce their electricity consumption. The incentive structures also affect the willingness of certain parties to shift their consumption patterns in ways that would reduce system peak loads.

4. Sierra has a special interest in the structures of the tariffs that will be established at the conclusion of this case, inasmuch as these rate structures will influence both the energy consumption patterns of end-use customers and the willingness of EKPC's member co-ops to participate actively in demand-side management (DSM) programs. The approved tariffs will also affect the willingness of customers to invest in efficient

combined heat and power technologies. The energy consumption patterns that will result from the set of tariffs and economic incentives established in this proceeding are likely to affect the total amount of electricity consumed and the environmental impacts caused by the generation of that electricity. Sierra believes that these issues and concerns are not otherwise adequately represented by the other intervenors.

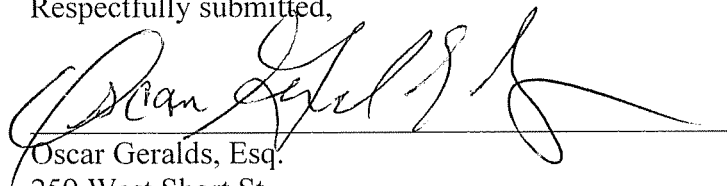
5. Sierra plans to present issues and develop facts that assist the Commission in fully considering the effects of various tariffs and rate structures in a constructive manner that does not unduly complicate or disrupt the proceedings.

The attorney of record who is authorized to represent Sierra in this proceeding and to take service of all documents is:

Oscar Geraldts, Esq.
259 West Short St.
Lexington, KY 40507
Ph: (859) 255-7946; Fax: (859) 233-4099
E-mail: ogeraldts@lexkylaw.com

WHEREFORE, the Cumberland Chapter of the Sierra Club requests that it be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Oscar Geraldts", is written over a horizontal line. The signature is fluid and cursive.

Oscar Geraldts, Esq.
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COUNSEL FOR SIERRA CLUB

February 12, 2007