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February 13, 2008

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

Re: **Motion for Full Intervention**
Public Service Commission, Case No. 2007-00477

Dear Ms. O'Donnell:

At the request of Joe Childers, I am enclosing an original and ten copies of the above-captioned Motion for Full Intervention in PSC Case No. 2007-00477. Also enclosed is an extra copy to "date-stamp" and give return to me for our file. A self-addressed postage-paid envelope is enclosed for your convenience.

Thank you for your assistance.

Sincerely,



Patricia Pruitt
Secretary to Joe F. Childers, Esq.

Enclosures

tmp/letters/CAC/ltr Beth O'Donnell 2-13-08

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FEB 14 2008

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INVESTIGATION OF THE)
ENERGY AND REGULATORY)
ISSUES IN SECTION 50 OF)
KENTUCKY'S 2007 ENERGY ACT)

CASE NO. 2007-00477

MOTION FOR FULL INTERVENTION

Comes now the Kentucky Association for Community Action, Inc. (KACA), 101 Burch Court, Frankfort, KY 40601, and Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), P.O. Box 11610, Lexington, KY 40576, by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby moves for leave to intervene as full parties in the above-referenced proceeding. In support of this motion, KACA and CAC state 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. CAC 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 of Kentucky Utilities Company's service territory. As such, it is likely to present issues and provide a perspective which is not likely to be presented by the other parties to this proceeding, and its interests are not adequately represented by other parties to this proceeding. CAC's participation will not unduly delay these proceedings.
3. In this proceeding, the Commission itself initiated an investigation into the energy and regulatory issues enumerated by the General Assembly in Section 50 of House Bill 1, enacted during the 2007 Second Extraordinary Session. By Order entered November 20, 2007, the Commission invited interested stakeholders to intervene in this action and encouraged such stakeholders to submit testimony. KACA and CAC are interested stakeholders, as recognized by the Commission: "In accordance with the RFP, the consultant will discuss the issues set forth in Section 50 of the 2007 Energy Act with . . . stakeholders representing low-income advocacy groups . . ." (November 20, 2007 Order, p. 2).
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. CAC expects to present testimony from Jack E. Burch, Executive Director. Additionally, CAC may choose to present testimony from other witnesses not yet identified.

6. The intervention of KACA and CAC 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.
7. KACA and CAC respectfully request that they be granted leave for full intervention and to participate fully as parties 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.



JOE F. CHILDERS

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ACTION, INC. AND COMMUNITY
ACTION COUNCIL FOR
LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS
COUNTIES, 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:

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on this the 13th day of February, 2008.



JOE F. CHILDERS