



SEC

STAND ENERGY CORPORATION

1077 Celestial Street • Rookwood Bldg • Suite 110
Cincinnati, Ohio 45202-1629
(513) 621-1113
(800) 598-2046
(513) 621-3773 Fax

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JAN 29 2008

PUBLIC SERVICE
COMMISSION

January 28, 2008

VIA UPS NEXT DAY AIR

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

**Re: 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.**

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned matter is an original and ten (10) copies of combined Motions for Full Intervention on the part of the Kentucky Oil & Gas Association, Inc. and the Stand Energy Corporation Customer Group.

The motions were combined because John M. Dosker will be representing both the KOGA and the Stand Energy Corporation Customer Group.

Thank you for your prompt attention to this filing and you may contact me if you require any further information.

Sincerely,

John M. Dosker
General Counsel

Encls.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JAN 29 2008

PUBLIC SERVICE
COMMISSION

In the Matter of :

AN INVESTIGATION OF THE) ADMINISTRATIVE
ENERGY AND REGULATORY) CASE NO. 2007-00477
ISSUES IN SECTION 50 OF)
KENTUCKY'S 2007 ENERGY ACT)

**COMBINED MOTION TO INTERVENE OF THE
KENTUCKY OIL & GAS ASSOCIATION AND
THE STAND ENERGY CORPORATION CUSTOMER GROUP**

1. On November 20, 2007, The Kentucky Public Service Commission, on its own motion, initiated an investigation into energy and regulatory issues enumerated by the General Assembly in Section 50 of House Bill 1, enacted during the 2007 Second Extraordinary Session. The General Assembly has *directed* the Commission to examine its statutes and make recommendations on or before July 1, 2008 to the Legislative Research Commission regarding the four energy and regulatory issues to be discussed in this case.

2. The Kentucky Oil & Gas Association, Inc. ("KOGA") is a Kentucky non-profit corporation the purpose of which is, *inter alia*: ". . . to obtain and disseminate to its members reliable information in regard to the oil and gas operations, production and activities in the Kentucky fields . . . to promote and advance the interests of the members in an impartial and businesslike manner . . . [and] to take such steps in regard to legislation as may be necessary to the proper protection and advancement of the interests of the members . . ." (KOGA By-Laws, Article III, paragraph 2). Some economic and other interests of the 262 KOGA members are protected and advanced by K.R.S. 278.507 which requires the Kentucky Public Service Commission "*to facilitate greater utilization of the natural gas produced or available for*

production within the state, where this can be done without detriment to the customers of utilities under jurisdiction of the Commission." KOGA will facilitate discussion in this proceeding of what the Kentucky Public Service Commission has done to fulfill this existing legislative mandate and what can be done by the Kentucky Public Service Commission in the future to facilitate the use of Kentucky-produced natural gas. KOGA has authorized the undersigned attorney to represent the interests of its members in this proceeding and to accept service of documents:

John M. Dosker
General Counsel
Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, Ohio 45202-1629
(513) 621-1113 (Phone)
(513) 621-3773 (Fax)
jdosker@stand-energy.com

3. Stand Energy Corporation ("Stand Energy") is a privately held Kentucky Corporation engaged in the marketing of natural gas to numerous end use customers in over 12 states, including the Commonwealth of Kentucky. Stand Energy Corporation's principal place of business is: 1077 Celestial Street, Suite #110, Cincinnati, OH 45202-1629. The above-named and undersigned General Counsel is licensed to practice law in Kentucky (KBA No. 82089) and is a former member of Executive Committee of the North American Energy Standards Board (NAESB), Gas Supplier Segment. Stand Energy's twenty-three (23) years of experience in more than a dozen states (including Kentucky) and KOGA's 77 years experience with Kentucky gas issues will likely lead to the presentation of unique issues or to the development of relevant facts that may assist the Commission in the instant case.

4. Stand Energy currently serves transportation customers behind four of the six Kentucky investor-owned natural gas distribution companies as well as customers on several

large municipally-owned gas distribution systems in Kentucky. The Stand Energy Corporation Customer Group is made up of transportation gas customers in Kentucky. Stand Energy currently serves, but is not representing in this proceeding, several Commonwealth of Kentucky facilities and several large Public Universities in Kentucky. The identity and therefore the privacy of the individual members of The Stand Energy Corporation Customer Group should not be publicly disclosed because that information is competitively sensitive information - the disclosure of which would injure Stand Energy and disclosure could lead to intimidation or retribution against individual members of The Stand Energy Corporation Customer Group by one or more of the regulated gas utilities involved in this proceeding. Therefore, the Stand Energy Corporation Customer Group is willing to furnish to the Commission, under confidential seal if so required, signed agency agreements authorizing Stand Energy to represent customers in this particular matter.

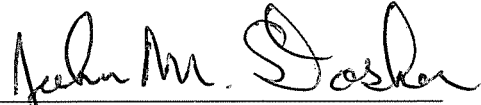
5. Neither KOGA nor The Stand Energy Corporation Customer Group's participation in this case will unduly complicate, disrupt or delay the proceedings. KOGA and Stand Energy and its General Counsel have previously participated in gas regulatory cases before the Kentucky Public Service Commission. KOGA and The Stand Energy Corporation Customer Group seek the right to present testimony if appropriate, cross-examine witnesses, and file briefs at the appropriate time or participate in oral argument if oral argument is granted.

6 KOGA and the Stand Energy Corporation Customer Group have differing commercial goals and direction relative to other parties in this case. KOGA is the primary organization representing the interests of Kentucky Natural Gas Producers. Stand Energy is a privately held marketer and its General Counsel has absolutely no connection to any regulated utility in any state. Stand Energy has a unique blend of public and private customers in

Kentucky and no other participant can adequately represent or protect the interests of the Stand Energy Corporation Customer Group.

7. Wherefore, KOGA and The Stand Energy Corporation Customer Group respectfully request that the Commission grant them full Intervenor status pursuant to KRS 278.310 and 807 KAR 5:001 §3(8) and that they be treated as individual parties hereto with rights to have notice of and appear at the taking of testimony, cross-examine witnesses, and be heard through the undersigned counsel.

Respectfully Submitted,



JOHN M. DOSKER (KBA #82089)
GENERAL COUNSEL
Stand Energy Corporation
1077 Celestial Street, Suite #110
Cincinnati, OH 45202-1629
(Phone) (513) 621-1113
(Fax) (513) 621-3773
jdosker@stand-energy.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was hand-delivered or mailed, first class postage prepaid, this 26th day of January 2008, to the following parties of record:

Ronnie Thomas
East Kentucky Power Cooperative
4775 Lexington Road
P.O. Box 707
Winchester, KY 40392-0707

Charles A. Lile, Esq.
Senior Corporate Counsel
4775 Lexington Road
P.O. Box 707
Winchester, Kentucky 40392-0707
Counsel for East Kentucky Power
Cooperative, Inc.

Lonnie E. Bellar
Vice President, State Regulation and Rates
Louisville Gas & Electric Company
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, Kentucky 40202

Lonnie E. Bellar
Vice President - State Regulation
Kentucky Utilities Company
220 West Main Street
P.O. Box 32010
Louisville, Kentucky 40202

Mark R. Overstreet, Esq.
Stites & Harbison PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
Counsel for Kentucky Power Company

Michael H. Core
Big Rivers Electric Corporation
201 Third Street
P.O. Box 24
Henderson, KY 42420

Patty Walker
Duke Energy Kentucky, Inc.
139 East Fourth Street, EX 400
Cincinnati, OH 45202

John J. Finnigan, Jr., Esq.
Senior Counsel
139 East Fourth Street, EX 400
Cincinnati, Ohio 45202
Counsel for Duke Energy Kentucky, Inc.

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

Allyson K. Sturgeon, Esq.
Senior Corporate Attorney
E.ON U.S. LLC
220 West Main Street
Louisville, Kentucky 40202
Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company

Dennis Howard, II, Esq.
Lawrence D. Cook, Esq.
Paul D. Adams, Esq.
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204
Assistant Attorneys General
Utility & Rate Intervention Division

David F. Boehm, Esq.
Michael L. Kurtz, Esq.
Roehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202-4434
Counsel for Kentucky Industrial
Utility Customers, Inc.

Timothy C. Mosher
American Electric Power
101 A Enterprise Drive
P.O. Box 5 190
Frankfort, KY 40602

Stephen A. Sanders, Esq.
Appalachian Citizens Law Center, Inc.
52 Broadway, Suite B
Whitesburg, KY 41858

Lisa Kilkelly, Esq.
Legal Aid Society, Inc.
416 W. Muhammad Ali Blvd., Suite 300
Louisville, Kentucky 40202
Attorney for POWER/ACM


JOHN M. DOSKER