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RECEIVED

December 17, 2007

DEC 19 2007

PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

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

Re: Case No. 2007-00477

Dear Ms. O'Donnell:

Please find enclosed the original and ten copies of Petition to Intervene of the Cumberland Chapter of the Sierra Club to be filed in the above-referenced matter.

Sincerely,



Stephen A. Sanders
Attorney at Law

Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

DEC 19 2007

PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INVESTIGATION OF THE ENERGY)
AND REGULATORY ISSUES IN SECTION) Administrative
50 OF KENTUCKY'S 2007 ENERGY ACT) Case No. 2007-00477

PETITION TO INTERVENE
OF THE CUMBERLAND CHAPTER OF THE SIERRA CLUB

Pursuant to KRS 278.310 and 807 KAR 5:001 Section 3(8), the Cumberland Chapter of the Sierra Club (Sierra Club), by counsel, respectfully requests that the Commission grant it full intervenor status in the above-captioned proceeding and states in support of the Petition as follows:

1. On page 4 of its Order dated November 20, 2007, which initiated this proceeding, the Commission stated that it "well recognizes the importance of the issues under investigation in this case, and the fact that we have been tasked with a quasi-legislative function. Consequently, we strongly encourage interested stakeholders to actively participate in this proceeding, either by requesting to intervene or by simply filing written comments in accordance with the procedural schedule."
2. The Sierra Club is America's oldest and largest grassroots environmental organization, with approximately 5,000 members in Kentucky who reside throughout the state. Nationally, it has 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 the Sierra Club has focused increasing attention and expended significant resources on energy-related issues such as global warming, energy efficiency, and renewable energy technologies. The Sierra

Club's 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. The Cumberland Chapter of the Sierra Club has been interested in promoting the enhancement of energy end-use efficiency in all sectors of Kentucky's economy and it has participated in other proceedings before the Commission to further that goal.

3. The Sierra Club plans to present issues and facts that will assist the Commission in fully considering this matter in a constructive manner that does not unduly complicate or disrupt the proceedings.

4. The Commission has discretion to decide whether to grant intervenor status to individuals or groups that request it. The criteria that condition the Commission's discretion on this matter are set forth in 807 KAR 5:001, Section 3(8)(b), which reads as follows:

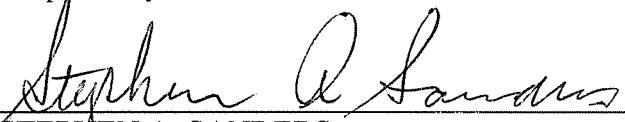
If the commission determines that a person has a special interest in the proceeding which is not otherwise adequately represented or that full intervention by the party is likely to present issues or to develop facts that will assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings, such person shall be granted full intervention.

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

Stephen A. Sanders, Esq.
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52 Broadway, Ste B
Whitesburg, KY 41858
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E-mail: steve@appalachianlawcenter.org

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

Respectfully submitted,

A handwritten signature in cursive script that reads "Stephen A. Sanders". The signature is written in black ink and is positioned above a horizontal line.

STEPHEN A. SANDERS

Attorney at Law

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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 to the following on the 18th day of December, 2007.

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