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APR 10 2008

PUBLIC SERVICE
COMMISSION

April 9, 2008

Paul Adams
Assistant Attorney General
The Kentucky Office of the Attorney General
1024 Capital Center Dr.
Frankfort, KY 40602-2000

Anita L. Mitchell
Public Service Commission
P.O. Box 615
211 Sower Blvd.
Frankfort, KY 40602-0615

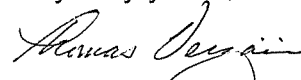
John J. Finnegan, Jr.,
Assistant General Counsel
Duke Energy Shared Services, Inc.
Room 2500 Atrium II
P.O. Box 960
Cincinnati, OH 45201-0960

Re: In the Matter of The Application of Duke Energy Kentucky, Inc. to Re-
Institute a Home Energy Assistance Program, Case No. 2008-00100

Dear Ms. Mitchell and Messrs. Adams & Finnegan:

Enclosed please find a copy of a Motion by Northern Kentucky Community Action Commission to Intervene, which is being filed with the Kentucky Public Service Commission.

Very truly yours,


Thomas P. Vergamini

TPV:sw
Enclosure
cc: Florence Tandy (w/enclosure)

BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In The Matter Of:

THE APPLICATION OF DUKE)
ENERGY KENTUCKY, INC. TO)
RE-INSTITUTE A HOME ENERGY) CASE NO. 2008-00100
ASSISTANCE PROGRAM)

**MOTION OF
NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION
TO INTERVENE**

Pursuant to 807 KAR 5:001, Sec. 3(8) the Northern Kentucky Community Action Commission, Inc. ("NKCAC") moves the Commission for an Order granting permission and leave for NKCAC to fully intervene as a party to this proceeding.

In support of this Motion, NKCAC states as follows:

1. NKCAC is a statutorily authorized community services commission that provides services to economically disadvantaged persons in an eight county Northern Kentucky region. *KRS 273.405-453*. NKCAC, whose Executive Director is Ms. Florence Tandy, has a business address at 717 Madison Ave, P.O. Box 931, Covington, KY 41011.
2. NKCAC will be represented in this proceeding by its outside counsel, Thomas Vergamini, Taft Stettinius & Hollister LLP, 1717 Dixie Highway, Suite 340, Covington, Kentucky 41011-4704. Mr. Vergamini is authorized to practice law in the Commonwealth of Kentucky.
3. NKCAC is a member of the Residential Collaborative that participates with Duke Energy Kentucky ("DE-Kentucky") and other interested parties in approved Demand Side Management energy programs that DE-Kentucky has available.
4. The subject matter of this specific proceeding affects NKCAC and its clients.

Therefore, the full intervention of NKCAC as a party to this proceeding is required to assure that the interests of the clients of NKCAC are met and protected.

5. The intervention of NKCAC in this proceeding will not unreasonably delay this proceeding and will allow the Commission to better evaluate the filing made by DE-Kentucky.

6. This proceeding was initially part of a separate Application involving a DE-Kentucky Demand Services Management program (Case No. 2007-00369) that is pending before the Commission. In that prior Application NKCAC was identified as an interested party as shown in the certificate of services statements accompanying the pleadings filed in that proceeding.

7. NKCAC submits that good cause exists for the Commission to approve and grant this Motion to Intervene.

WHEREFORE, NKCAC respectfully requests that the Commission approve this Motion and issue an Order granting NKCAC the right to fully intervene as party in this proceeding.

Respectfully submitted,

NORTHERN KENTUCKY COMMUNITY ACTION
COMMISSION, INC.

By: 
Thomas P. Vergamini (KBA #72983)
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Covington, KY 41011-4704
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E-mail: vergamini@taftlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served on the following via ordinary United States mail, postage prepaid, this 9TH day of April, 2008:

Paul Adams
Assistant Attorney General
The Kentucky Office of the Attorney General
1024 Capital Center Drive
Frankfort, KY 40602-2000

Anita L. Mitchell
Public Service Commission
P.O. Box 615
211 Sower Boulevard
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