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May 14, 2008

PUBLIC SERVICE COMMISSION

Stephanie Stumbo, Executive Director
Kentucky Public Service Commission
P.O. Box 615, 211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Re: Case No. 2008-00128

Dear Ms. Stumbo:

Please find attached for filing with the Commission an original and six copies of an application for a rehearing of the Commission's decision dated 4/28/08 to deny my petition for intervention in the above-referenced proceeding.

Sincerely,

Geoffrey M. Young

Geoffrey M. Young

Enclosures

cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE REVISION OF COGENERATION AND	)	
SMALL POWER PURCHASE RATES OF	)	**CASE NO.**
EAST KENTUCKY POWER COOPERATIVE, INC.	)	**2008-00128**

APPLICATION FOR REHEARING RE THE PETITION TO INTERVENE OF GEOFFREY M. YOUNG

Pursuant to KRS 278.400, I hereby submit an application for the rehearing of the Commission's decision to deny my petition for full intervenor status in the above-captioned proceeding, as set forth in its Order dated April 28, 2007. I believe that the Commission's decision to deny may have been based on one or more misunderstandings, which this application for rehearing is intended to clarify. I believe that, upon due consideration of the points set forth below, the Commission may decide to reverse its decision of 4/28/08 and allow me to participate in this proceeding as a full intervenor.

On March 31, 2008, East Kentucky Power Cooperative, Inc. (EKPC) filed with the Commission proposed revisions to its Tariff for Qualified Cogeneration and Small Power Production Facilities. On April 4, 2008, the Commission acknowledged receipt of EKPC's filing and initiated the above-captioned proceeding to consider the proposed revisions and the documentation therefor. On April 10, 2008, I submitted a petition for full intervention, on April 15 EKPC submitted its response and objections to my petition, on April 21 I submitted responses to EKPC's objections, and on April 28 the Commission denied my petition. The Commission may now wish to reverse its decision for the following reasons:

1. In its Order of 4/28/08, the Commission stated that it "agrees with EKPC's assertion that Mr. Young's interest in representing an 'environmentalist perspective' and promoting energy efficiency in general is beyond the scope of this proceeding." [Order at page 3] Referring to EKPC's Response and Objections, it appears that the particular assertion of EKPC with which the Commission is here expressing agreement is stated in the last part of EKPC's Ground No. 2 and the first part of its Ground No. 3, as follows:

> 2. ...his [Mr. Young's] identified concerns about environmental issues are not relevant to the revision of EKPC's purchase rates pursuant to 807 KAR 5:054. Mr. Young is attempting to improperly inject into this case his own personal interests in environmental issues, which are beyond the Commission's jurisdiction and the scope of this proceeding.
>
> 3. Mr. Young's inappropriate attempt to pursue his environmental agenda through intervention would in no way assist the Commission in fully considering the proper subject of this case – which is EKPC's avoided costs. Such intervention would, instead, burden the case with arguments and information which would not be material to the determination of fair, just and reasonable rates for EKPC's purchases from Qualifying Facilities, and would unduly complicate and disrupt the proceedings. [EKPC Response and Objections, 4/15/08, at page 2]

EKPC's assertion that environmental issues are not relevant to the revision of EKPC's purchase rates pursuant to 807 KAR 5:054 is unsupported and incorrect. I have already addressed this argument in part in my response to EKPC's objections, as follows:

> The tariff under consideration will affect the number of qualifying facilities (QFs) that will be proposed for development in EKPC's service territory. The number and capacity of such facilities will in turn affect both the natural environment in Kentucky and the efficiency with which fuel is converted into useful energy services. Both of my stated interests in this proceeding – the environment and energy efficiency – will be directly affected by the Commission's final Order that establishes the tariff, including its terms and conditions. [Young, Response to EKPC's Objections, 4/21/08, at page 2]

To elaborate slightly, the number and capacity of QFs that end up being developed and going into operation in EKPC's service territory will affect the amount of coal that will be mined and burned in Kentucky. The amount of coal burned will in turn affect the

amount of air pollution that Kentucky residents, including myself, will have to breathe over the next several years and decades. That in turn will affect our health and well-being, as well as the amount of money we will need to spend to treat the negative effects that this air pollution will have on our health. These health impacts and economic costs, though perhaps difficult to quantify precisely, are nevertheless very real. In its petition to intervene in Case No. 2006-00472, General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc., the Sierra Club succinctly stated the issue as follows:

> 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. [Sierra Club Petition, 2/12/07, at pages 1-2]

It should be noted that the Commission approved the Sierra Club's full intervention in that rate case despite the fact that EKPC raised objections on that occasion as well. It is hard to understand how the Commission could consider a special interest in the environment to be legitimate in the context of a rate case and yet beyond the scope of a case that will directly affect the number of QFs developed and the amount of coal burned in Kentucky.

The next point that must be addressed is EKPC's assertion that "Mr. Young's inappropriate attempt to pursue his environmental agenda through intervention would in no way assist the Commission in fully considering the proper subject of this case – which is EKPC's avoided costs." In my role as witness for the Sierra Club in Case No. 2006-00472, I presented testimony to the effect that environmental considerations are an integral

part of the estimation of avoided costs. I cited the definition of avoided cost that appears in the *Energy Dictionary*, published online by EnergyVortex.com, as follows:

> Avoided cost is the marginal cost for the same amount of energy acquired through another means such as construction of a new production facility or purchase from an alternate supplier. For example, a megawatt-hour's avoided cost is the relative amount it would cost a customer to acquire this energy through the development of a new generating facility or acquisition of a new supplier. Short-run avoided cost refers to avoided cost calculated based on energy acquisition costs plus ongoing expenses. Long-run avoided cost factors in necessary long-term costs including capital expenditures for facilities and infrastructure upgrades. Avoided cost is typically used to calculate a fair price for energy produced by cogenerators and other energy producers that meet the specifications of the Public Utility Regulatory Policies Act [PURPA] of 1978. The use of avoided cost rates for cogenerated energy is intended to prevent waste and improve both efficiency and cleanliness by insuring that fair market prices are paid for energy generated from renewable resources, small producers and others.

I went on to state, "It is important to note that the definition of avoided cost includes a reference to the relative 'cleanliness' of renewable energy sources." [Sierra Club, Direct Testimony of Geoffrey M. Young, 6/29/07, page 36, line 15 to page 37, line 5]

The fact that in the field of energy and utility regulation, environmental considerations are widely considered to be an integral and inseparable component of the definition of avoided cost, pursuant to the intent and provisions of PURPA, implies that such considerations are not beyond the scope of this proceeding. PURPA is the only statute cited in 807 KAR 5:054 in its section on Necessity, Function, and Conformity. EKPC's assertion in its Response and Objections of 4/15/08 that environmental considerations are strictly irrelevant to this proceeding, and the Commission's apparent endorsement of this assertion in its Order of 4/28/08, are in error. At this point I must explicitly repeat that I am not arguing in the context of this proceeding that 807 KAR 5:054 should be amended. I am suggesting that information that I intend to provide, if

granted full intervenor status, may have a bearing on the way the Commission interprets and applies the existing provisions of 807 KAR 5:054 as it conducts the process of determining whether EKPC's proposed QF tariffs are fair, just and reasonable.

My other stated special interest in this proceeding, to promote enhanced energy efficiency in all sectors of Kentucky's economy, is also an integral part of the definition of avoided cost, as reflected in the phrase "prevent waste" in the *Energy Dictionary* entry reproduced above. Because cogeneration, also known as combined heat and power, can be more than twice as efficient as a stand-alone power plant in its conversion of fuel energy into useful electrical and thermal energy, the development of a large number of QFs in EKPC's service territory will clearly affect the energy efficiency of Kentucky's economy by capturing and making productive use of large amounts of thermal energy that would otherwise be wasted. Increased on-site generation will also reduce electrical grid losses. Far from being an "inappropriate attempt to pursue [my] environmental agenda," my stated interests in protecting the environment and promoting energy efficiency are inseparably tied, by definition, to the topic that EKPC claims is the sole proper focus of this case – EKPC's avoided costs.

2. In its Order of 4/28/08, the Commission stated that it does not agree with "Mr. Young's assertion that the enactment of the 2007 Energy Act has expanded the Commission's jurisdictional limitations to include the issues he seeks to advocate in this case. To the contrary, the 2007 Energy Act directed the Commission to study and make recommendations to the legislature regarding issues of energy efficiency and energy [sic: the Commission apparently meant "environmental"] costs – not to implement those issues." [Order at page 3]

The first clause quoted above is a serious misunderstanding or mischaracterization

of my stated position. In my response to EKPC's objections, I was careful not to make any conclusory statements about the what the Commission's jurisdictional limitations were before the passage of the Energy Act and what they are now. [Young, Response to Objections, 4/21/08, at pages 2-3] My reference to the 2007 Energy Act was made in the context of refuting EKPC's assertion that environmental issues are strictly irrelevant to this proceeding. The position that EKPC has staked out is an extreme one. I am well aware that Administrative Case No. 2007-00477, which the Commission initiated in response to Section 50 of the 2007 Energy Act, is still going on, and that Section 50 did not include either an immediate change in the Commission's jurisdictional limitations or a mandate for the Commission to make such a change on its own authority without further action or review by the General Assembly.

My sole purpose in citing certain provisions of the 2007 Energy Act was to show a general intent on the part of the General Assembly and the Governor to require the Commission to consider these issues in some way. Rather than stating that the passage of the 2007 Energy Act "has expanded the Commission's jurisdictional limitations to include the issues he seeks to advocate in this case," I stated that the Act expressed the idea that certain environmental and energy efficiency issues "are at least on the table for consideration by the Commission." [Young, Ibid., at page 3] I consider the Commission's characterization of my position to be an instance of the rhetorical technique known as a straw-man argument. The Commission said I took a certain extreme position and then proceeded to knock it down. The Commission appears to be overlooking the extreme nature of EKPC's position – that environmental and efficiency considerations must, as a matter of law, be kept completely off the table in the context of this proceeding. At the same time, the Commission has paraphrased my actual position – that environmental and

efficiency issues should not be excluded a priori from consideration in this case – in a way that makes it more extreme than what I wrote. In its decision to deny my full intervention, the Commission may even be echoing EKPC's extreme position. [Order, 4/28/08, at p.3]

3. In its response and objections, EKPC stated as follows:

> In his petition, Mr. Young refers to various cogeneration and small power issues that he raised on behalf of the Sierra Club in PSC Case No. 2006-00472, and states his intention to address those issues again in this proceeding. The Commission has already ruled on the recommendations regarding EKPC's cogeneration and small power tariff made by Mr. Young in EKPC's rate case, all of which were rejected in the Commission's order dated December 5, 2007. [EKPC, 4/15/08, at page 2]

In my response to EKPC's objections, I took strong exception to the assertion that all of these issues were determined definitively by the Commission in Case No. 2006-00472, and I discussed EKPC's argument in detail. [Young, Response to Objections, 4/21/08, at pages 3-6] However, in its Order of 4/28/08, the Commission appears to endorse EKPC's reasoning on this point when it states, "Nor would it be appropriate or lawful to revisit the Sierra Club's issues that were adjudicated in Case No. 2006-00472, because no timely request was filed to rehear those issues in that case." [Order, bottom of page 3]

I believe this reasoning to be illogical for the following reasons:

(a) The Commission issued a definitive ruling on 12/5/07 stating that "a rate case is not the appropriate forum to challenge an existing QF tariff." [Order, Case No. 2006-00472, page 41, lines 1-2] Neither the Sierra Club nor any other party to the rate case raised any objection to this ruling, either at the time it was issued or since. If the rate case was not the appropriate forum in which to consider the QF tariff, it follows that the bulk of the comments the Commission made on that topic during the rate case must have been advisory in nature rather than definitive. It would have been highly illogical for the Commission to rule that it is improper to consider the QF tariff as part of the rate case, and

then to issue a series of definitive rulings about the same QF tariff on the basis of considerations that were not supposed to have taken place.

(b) The measured, judicious wording of the bulk of the Commission's comments related to the QF tariff in its Order of 12/5/07 in fact takes the form of advisory comments and not definitive rulings. [Young, Response to Objections, 4/21/08, at pages 4-5]

(c) Instead of considering and ruling on the QF tariff as part of the rate case, the Commission ordered EKPC to "file an application to update the avoided costs reflected in its QF tariffs no later than March 31, 2008, as described in this Order." [Order, 12/5/07, page 40] At the same time, the Commission ruled that the specific modifications to the QF tariff proposed by the Sierra Club should be denied. [Ibid.] Any reasonable person would conclude that although it would probably be inadvisable for me to try to resubmit the Sierra Club's proposed tariff verbatim in the context of a subsequent QF tariff proceeding, the Commission would nevertheless be receptive to *other* information bearing on the interpretation of 807 KAR 5:054 and its application to EKPC's QF tariff.

(d) The Sierra Club did not file a timely request for a rehearing of the QF-related issues in Case No. 2006-00472 because Kentucky environmentalists saw no rational reason to do so. In view of the fact that a separate proceeding to consider EKPC's QF tariff was scheduled to begin in a few months, we decided it would be imprudent to try to convince the Commission to reverse its decision yet again about the appropriate forum for the QF tariff. We assumed, with reason, that the proceeding scheduled to begin on March 31, 2008, would be the most appropriate forum in which to consider issues such as the interpretation of 807 KAR 5:054, the definition of avoided costs, the environmental and efficiency impacts arising from the QF tariffs, the methodology EKPC used to estimate avoided costs and convert that data into QF rates and tariff conditions, and a number of

other pertinent issues. The Sierra Club had reason to believe that if it had submitted a request for a rehearing of the QF-related issues in the rate case, the Commission would have immediately replied that the rate case is not the appropriate forum and questioned why we didn't seem capable of reading and comprehending the Commission's definitive ruling on that point, or its persuasive justification for that ruling. [Order of 12/5/07 in Case No. 2006-00472, at pages 40-41] It seems unreasonable for the Commission, as one of its reasons for denying my application for full intervention, to cite the Sierra Club's failure to pursue a course of action that appears, on its face, to be self-defeating.

(e) The Commission appears to be putting environmentalists in a double bind in regard to the examination of EKPC's QF tariffs. After being invited by the Commission to ask questions, present information, and provide a proposed QF tariff in the rate case, environmentalists were told that a rate case is not the proper forum for this issue after all; that the tariff we proposed ***does not appear*** to conform to the pertinent regulation; that our proposed tariff ***does not appear*** to contain any rates [which it actually did contain – please refer to my response to EKPC's objections, 4/21/08, page 5]; that our proposed tariff is hereby denied; and that there will be another case scheduled in which the QF tariff will be fully considered. When I, as an environmentalist, duly requested intervenor status in the subsequent case in order to move the investigation forward within the forum the Commission had established for it, I was told that the issues related to the environment and energy efficiency had all been resolved definitively in the rate case [which, according to the Commission, was not the proper forum for resolving those issues], are not relevant to the scheduled QF tariff proceeding, and may not lawfully be brought up in this proceeding. [Order, 4/28/08, at page 3] Either way, the environmentalists' perspective, information and proposals are excluded from full consideration.

4. In its response and objections to my petition to intervene, EKPC stated that I do not claim to have any information concerning the utility's avoided costs. [EKPC, 4/15/08, at page 2] This assumption is incorrect. EKPC is well aware that as the Sierra Club's witness in Case No. 2006-00472, I presented information relevant to EKPC's avoided costs in the form of direct testimony, responses to information requests by the Commission and EKPC, and during testimony on the witness stand. I would be able to cite pertinent portions of this information, as well as to provide other information relevant to EKPC's avoided costs, if I were to be granted full intervenor status in this proceeding.

5. In its response and objections to my petition to intervene, EKPC stated that I do not "represent the interests of the owners of qualified cogeneration or small power production facilities ('Qualifying Facilities'), to which the purchase rates and terms in the subject EKPC tariff apply." [EKPC, 4/15/08, at pages 2-3] Although I am not a party to agreements with any particular QFs or potential QFs at this time, the claim that I do not represent the interests of any potential QFs is an overstatement. As a result of my stated interests in improving energy efficiency and protecting the environment, I am also concerned to ensure that EKPC's QF tariffs do not discriminate unduly against potential developers of QFs that use environmentally beneficial energy conversion technologies. To the extent that my participation as a full intervenor in this proceeding furthers the interests of this group of potential QF developers by removing unnecessary barriers to their entering into contracts with EKPC, I could be said to be representing their interests.

I am not aware of any other party to this case that has claimed to represent the interests of potential developers of environmentally beneficial QFs. Gallatin Steel's petition for intervention made no reference to these potential QF developers. If the Commission does not reverse its decision to deny my petition, it is highly likely that the

special interests of developers of environmentally beneficial QFs will not be adequately represented in this proceeding.

6. The Commission provided another argument to support its denial of my petition in its Order of 4/29/08, as follows:

> The Commission also finds that, as a resident of Lexington, Kentucky, which is entirely within the exclusive service area of Kentucky Utilities Company, Mr. Young is not a customer of any EKPC distribution cooperative member – an issue not discussed by Mr. Young in his petition nor addressed by EKPC in its response. Therefore, if allowed to participate as a full intervenor in this matter, Mr. Young would not be likely to present issues and develop facts that would assist the Commission in fully considering the relevant issues in the present case without unduly complicating or disrupting the proceedings. [Order, at page 4]

The assumption that I am not a customer of any cooperative member of the EKPC system is correct. The reason I did not discuss it is because that fact is not relevant to the question of whether the Commission should use its discretionary authority to grant me full intervenor status in this proceeding. I reproduced the pertinent section of 807 KAR 5:001, Section 3(8)(b), in my original petition to intervene. [Young, Petition, 4/10/08, at page 1] That regulation does not mention the idea that one must be a customer of the utility in order to be granted intervention, or even that one's status as a customer is one factor the Commission should weigh when making its decision about whether to approve a party's petition to intervene. The Commission appears to be adding another requirement that does not exist in 807 KAR 5:001, Section 3(8)(b), and using it in part to disqualify a petitioner who has otherwise met all of the actual requirements of the regulation.

The cited passage from the Commission's 4/28/08 Order also contains a logical fallacy. Whether or not I am a customer of an EKPC member cooperative does not logically have any bearing on the kind of information I would be likely to develop, the type

of questions I would be likely to ask, or my ability to conform to the procedural schedule the Commission has established for this case. The only prong of 807 KAR 5:001, Section 3(8)(b) that my being a customer could possibly relate to is the question of whether I have a special interest in the proceeding which is not otherwise adequately represented. Evidence related to that prong of the regulation has been discussed above and in the other documents I have submitted in this proceeding and cited herein.

As I noted in my petition, 807 KAR 5:001, Section 3(8)(b) affords two alternative bases for being granted full intervenor status, i.e., it is not necessary for a petitioner to meet both criteria. [Young, Petition, 4/10/08, at pages 1-2] I was very careful to observe this principle in my petition by explicitly separating those grounds that relate to the first prong from those that relate to the second. [Ibid., at pages 1-4] In combining concepts from both prongs of the regulation in a single sentence, the Commission is obscuring the fact that a petitioner needs to meet only one of the prongs in order to be granted full intervention. The Commission appears to be making the claim that if I do not have a special interest that the Commission considers legitimate, it must follow, as a matter of logic, that I must also be unable to present information in a manner that would assist the Commission in fully considering the relevant issues without unduly complicating or disrupting the proceedings. This claim is illogical, unfair, and contrary to the intent of 807 KAR 5:001, Section 3(8)(b).

I have been participating in a constructive manner in proceedings before the Commission for the past 15 years, first as an employee of the Commonwealth's state energy office and then as a volunteer with the Sierra Club. I believe I have established a pretty good track record of asking pertinent questions, developing issues that are relevant to the proceedings in which I have been involved, avoiding the undue complication of any

proceeding, competently representing the interests of enhanced energy efficiency and environmental protection, respecting and adhering to procedural schedules and all applicable regulations and Commission-approved procedures, and generally assisting the Commission and its staff in fully considering the relevant issues. I don't believe I am an "unknown quantity" or that the Commission needs to be particularly concerned about what actions I am likely to engage in as a full intervenor.

As a further indication of the type of involvement the Commission might have cause to expect from me if it were to reverse its decision of 4/28/08 to deny my petition to intervene, I submitted a set of public comments on May 12, 2008. The substance of these comments took the form of information requests to EKPC that would help illuminate the methodology EKPC used to estimate its avoided capacity and energy costs and develop its proposed QF tariff. Although EKPC is under no legal obligation to respond to information requests from a party who is not presently a full intervenor, I offered these questions as an indicator of my intention to focus on the specific issues that the Commission has stated are included in the scope of this proceeding. I suggested that the Commission might wish to pose some or all of these questions to EKPC directly, in the interest of fully considering the issues that are clearly within the scope of the present proceeding. [Young, 1st Set of Public Comments, at page 1]

In conclusion, I believe I have shown both that I have more than one special interest in the subject matter of this proceeding which is not otherwise adequately represented, and that my full intervention is likely to present issues or develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceeding. Consequently, I believe that I have met both prongs of 807 KAR 5:001, Section 3(8)(b) and should be granted full intervention.

WHEREFORE, I respectfully request that the Commission reverse its decision of 4/28/08 and grant my petition for full intervention in this case.

Respectfully submitted,

Geoffrey M. Young 5/14/08

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CERTIFICATE OF SERVICE

I hereby certify that an original and six copies of the foregoing application for a rehearing were mailed to the office of Stephanie Stumbo, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, and that copies were mailed to the following parties of record on this 14th day of May, 2008.

Signed,

Geoffrey M. Young 5/14/08

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