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JUN 12 2008
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June 12, 2008

Hand-Delivered to the
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. 2008-00148

Dear Ms. Stumbo:

Please find attached for filing with the Commission an original and ten copies of my petition for full intervention as an individual in the above-referenced proceeding.

Sincerely,


Geoffrey M. Young

Enclosures

cc: Parties listed on the Certificate of Service

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 12 2008

PUBLIC SERVICE
COMMISSION

In the Matter of:

THE 2008 JOINT INTEGRATED RESOURCE)
PLAN OF LOUISVILLE GAS AND)
ELECTRIC COMPANY AND KENTUCKY)
UTILITIES COMPANY)

CASE NO.
2008-00148

PETITION TO INTERVENE
OF GEOFFREY M. YOUNG

Pursuant to KRS 278.310 and 807 KAR 5:001 Section 3(8), I, Geoffrey M. Young, respectfully request that the Commission grant me full intervenor status in the above-captioned proceeding and state my support thereof as follows:

1. I believe that this petition meets the requirements of both prongs of the regulation that determines whether full intervention should be granted.

The Commission has extensive latitude in deciding 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.

In a recent proceeding, the Commission reaffirmed that this regulation affords two alternative bases for seeking status as a full intervenor, i.e., that it is not necessary for the petitioner to meet both criteria. (Case No. 2006-00564, *In the Matter of: An Investigation into East Kentucky Power Cooperative, Inc.'s Continued Need for Certificated Generation*, Order, 4/19/07, page 2) If the Commission, upon due deliberation, determines either: a) that an individual has a special interest in this proceeding which is not otherwise adequately represented; or b) that full intervention by the petitioner is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings; or c) both, then the petitioner should be granted full intervention. The following grounds have been separated into two distinct categories – those grounds that are pertinent to my claim that I have a special interest in this proceeding which will not otherwise be adequately represented (grounds number 2 through 4 below), and those grounds that are pertinent to my claim that I am 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 (grounds number 5 and 6 below).

2. [re special interest not otherwise represented] I am a customer of Kentucky Utilities Company (“KU”).

3. [re special interest not otherwise represented] KU and LG&E operate several power plants in Kentucky that emit various pollutants into the air. The E.W. Brown Station in Mercer County has three old, coal-burning power plants with a combined capacity of 697 megawatts (MW), and the Tyrone Station in Woodford County has a 71-MW coal-burning power plant built in 1953. Mercer and Woodford Counties border on

Fayette County where I live. KU/LG&E also operates large, coal-burning power plants in Carroll County, Muhlenberg County, Jefferson County, and Trimble County. (*Kentucky's Electric Infrastructure: Present and Future*, PSC, 2005, pp 15-16) Kentucky's weather patterns are such that my wife and I are forced to breathe pollutants from these power plants that are potentially harmful to our health. In addition, KU/LG&E is presently building another coal-burning power plant in Trimble County.

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.

My interest in the quality of air I breathe is a personal interest. It is hard to imagine an interest more deeply personal than my own internal airways and blood vessels and those of my wife. Furthermore, if the Commission requires that a special interest be economic in nature, the quality of air we breathe is likely to affect the amount of money my wife and I will be forced to spend in future years to treat health problems that we may suffer because of KU/LG&E's existing and planned power plants.

The subject of this proceeding, how KU/LG&E will meet its customers' projected needs for power and energy for the next 15 years, is directly relevant to the amount of air pollution the utility's generating facilities will emit into the air over Kentucky. If KU/LG&E is able to meet a greater fraction of these projected needs by means of demand-

side and supply-side technologies that pollute less than coal-fired power plants, the environment will be safer for me and my wife.

4. [re special interest not otherwise represented] My interests in this proceeding are to make sure that relevant environmental impacts are considered in the course of this proceeding and to help eliminate impediments to the enhancement of energy end-use efficiency in all sectors of Kentucky's economy. My entire professional career has been devoted to these goals, most evidently as an employee of Kentucky's state energy office for 13 years. I was the division's lead person in several IRP cases before the Commission, including two of KU/LG&E's joint IRPs. Since leaving state government in the fall of 2004, I have continued to work to help enhance energy efficiency in Kentucky by volunteering with organizations such as the Sierra Club, Kentuckians for the Commonwealth, and the Kentucky Conservation Committee. In order to build support for enhanced energy efficiency efforts among the energy utility community in Kentucky, in 2005 I initiated the formation of an informal organization called the Kentucky Energy Efficiency Working Group, which I currently co-chair with Dick Stevie of Duke Energy. In the context of this petition, however, I am not presenting myself as a representative of or spokesperson for any organization.

The Cumberland Chapter of the Sierra Club has already decided that it will not seek intervention in this proceeding. To date, no other environmental or energy efficiency organization has requested full intervention. If the Commission were to deny this petition, it is likely that the interests of environmentalists and proponents of dramatically enhanced energy efficiency in Kentucky will not be adequately represented.

In its Order of 12/27/07 in Administrative Case No. 2007-00477, the Commission denied my petition for intervention as an individual on the grounds that I “was recently aligned with the Sierra Club when he filed expert testimony on its behalf in Case No. 2006-00472.” The Commission went on to propose that I “should participate either through the Sierra Club or through the Attorney General’s Office of Rate Intervention”. As a result of that Order, I approached the Attorney General’s Office of Rate Intervention and asked if they wanted me to work with them on Administrative Case No. 2007-00477. They did not reply in the affirmative. I have no reason to think their stance would be any different in the context of the present proceeding, and their interests, as established by statute, are not the same as mine anyway. Both avenues for intervention proposed by the Commission in its Order of 12/27/07 are closed to me in the present proceeding, which is why I am requesting intervenor status as an individual.

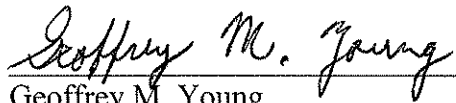
5. [re presenting information without complicating the proceedings] As an employee of the Kentucky Division of Energy for 13 years, most of that time as Assistant Director, I was the division’s lead technical representative in two of KU/LG&E’s IRP cases before this Commission – Cases No. 99-430 and No. 2002-00367. In both cases I participated in a constructive manner that I believe assisted the Commission in fully considering the IRPs without unduly complicating or disrupting the proceedings. I also participated constructively in seven other IRP cases for Kentucky’s other jurisdictional utilities. (Resume available on request.)

6. [re presenting information without complicating the proceedings] I am willing to present information in a clear and concise manner, submit information requests and written comments that are directly relevant to the process of assisting the Commission staff

in assessing the reasonableness of KU/LG&E's integrated resource plan, and abide by the procedural schedule the Commission has established for the conduct of this proceeding.

WHEREFORE, I respectfully request that I be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,



Geoffrey M. Young
454 Kimberly Place
Lexington, KY 40503
Phone: 859-278-4966
E-mail: energetic@windstream.net

6/12/08

Date

CERTIFICATE OF SERVICE

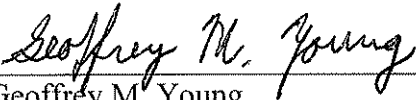
I hereby certify that an original and ten copies of the foregoing Petition to Intervene were delivered to the office of Stephanie Stumbo, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, and that copies were mailed to the following parties on this 12th day of June, 2008.

Rick E. Lovekamp
Manager, Regulatory Affairs
E.ON US Services, Inc.
220 West Main Street
Louisville, KY 40202

Honorable Dennis G. Howard II
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Honorable Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

Signed,



Geoffrey M. Young

6/12/08

Date