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Wyatt, Tarrant & Combs Fellow: Shawna Scheidel

IOLTA Fellows: Nollie McCall Betsy Janes Ms. Stephanie Stumbo, Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602-0615

RE: In the Matter of:

July 28, 2008

APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY, INC. FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS BASE RATES, CASE NO. 2008-00252

Dear Ms. Stumbo:

Enclosed for filing in the above-captioned case are an original and ten (10) copies each of a Motion for Full Intervention by the Association of Community Ministries ("ACM") and a Motion for Full Intervention by People Organized and Working for Energy Reform ("POWER").

Please confirm your receipt of these filings by placing the stamp of your office with the date received on the enclosed additional copy of each motion and return it to me in the enclosed self addressed stamped envelope.

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Lisa Kilkelly

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Attorney for POWER and ACM

Cc: parties of record

#LSC



## COMMONWEALTH OF KENTUCKY

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PUBLIC SERVICE
COMMISSION

## BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC	)	
COMPANY, INC. FOR AN ADJUSTMENT OF ITS	)	CASE NO
ELECTRIC AND GAS BASE RATES	)	2008-00252

## MOTION FOR FULL INTERVENTION BY ASSOCIATION OF COMMUNITY MINISTRIES

Comes now, **ASSOCIATION OF COMMUNITY MINISTRIES** ("ACM"), by counsel, and files this Motion for Full Intervention in the above-styled proceeding.

ACM is a Kentucky 501(c)(3) nonprofit corporation and its membership is comprised of 15 independent community ministries that provide services to the Louisville Metro area. The common mission for all 15 members is to provide an emergency assistance network in partnership with the Louisville Metro Government, local congregations, and other businesses and organizations. Each Ministry serves a specific geographical area to ensure that all of Louisville Metro is covered under the umbrella of the ACM. Among the social services provided by ACM members are utility assistance programs. ACM members assist low-income households whose utility service is disconnected by Louisville Gas & Electric Co. ("LG&E") because of their inability to pay utility bills by providing both financial assistance and advocacy. ACM members also implement the Winterhelp program. ACM's address is P.O. Box 99545, Louisville, Kentucky 40269.

ACM has a major interest in this proceeding. Year round, ACM member agencies provide direct service to low-income LG&E customers who cannot pay their

utility bills and face disconnections. Unfortunately, ACM member agencies do not have sufficient financial resources to assist all those in need and they are gravely concerned that increased rates will lead to more low-income LG&E customers facing shut offs and going without vital gas and electric service.

ACM participated as an intervenor before the Public Service Commission in the recently concluded Investigation of the Energy and Regulatory Issues in Section 50 of Kentucky's 2007 Energy Act. ACM also participated before the Commission as a Joint Applicant in the most recent Home Energy Assistance Program in the Louisville Gas and Electric service territory. ACM has taken over the advocacy activities previously conducted by Metro Human Needs Alliance ("MHNA"), which intervened before the Commission in the last Louisville Gas & Electric rate case.

ACM represents an interest that is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, the Association of Community Ministries requests that it be granted full intervention as a party to this proceeding.

<sup>2</sup> Joint Application of Louisville Gas & Electric Co., Association of Community Ministries, Inc., People Organized and Working for Energy Reform and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program, Case No 2007-00337.

<sup>&</sup>lt;sup>1</sup> Administrative Case No. 2007-00477.

<sup>&</sup>lt;sup>3</sup> An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company, Case No. 2003-00433.

Respectfully submitted,

LISA KILKELLY

LEGAL AID SOCIETY, INC. 416 West Muhammad Ali Blvd. Suite 300 Louisville, Kentucky 40202 (502) 584-1254 lkilkelly@laslou.org

Attorney for ACM

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Full Intervention by Association of Community Ministries was served on the following parties on the 26th day of July, 2008 by United States mail, postage prepaid.

<u>Jū Khly</u> Lisa Kilkelly

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