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ATTORNEYS AT LAW

AUG 1 2 2008

PUBLIC SERVICE COMMISSION

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#### **VIA US MAIL**

August 11, 2008

Stephanie Stumbo, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: Case No. 2008-00252

Dear Ms. Stumbo:

Enclosed on behalf of Community Action Kentucky, Inc. are the original and eleven (11) copies of a Motion for Full Intervention in the above-referenced proceeding.

Please return a file-stamped copy to me in the enclosed envelope. If you have any questions, do not hesitate to call.

Very truly yours,

1.4. Miles

Joe F. Childers

JFC/kdc Enclosure

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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AUG 1 2 2008

PUBLIC SERVICE COMMISSION

In the Matter of:

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

#### MOTION FOR FULL INTERVENTION

Pursuant to KAR 5:001 Section 3(8), Community Action Kentucky, Inc. (CAK), 101 Burch Court, Frankfort, KY 40601, hereby moves for leave to intervene as a full party in the above-referenced proceeding. In support of its Motion, CAK respectfully states as follows:

- 1. CAK is a Kentucky non-profit, 501(c)(3) public interest corporation that represents the Commonwealth's twenty-three (23) Community Action Agencies. CAK operates the Low Income Home Energy Assistance Program (LIHEAP) in all 120 Kentucky counties and provides assistance to approximately 150,000 low-income households in the state each year. CAK also provides technical assistance on an on-going basis to the state's four Demand-Side Management (DSM) Programs operated by American Electric Power, Louisville Gas and Electric Company, Union Light Heat and Power, and Western Kentucky Gas. These programs provide a variety of conservation services for low income households.
  - 2. By intervening in this action, CAK will present facts and concerns that will not be adequately addressed or represented by any other party. CAK's full intervention

CAK was formerly known as Kentucky Association for Community Action, Inc. (KACA), but has recently changed its name. KACA has intervened in many actions before this Commission on behalf of low-income customers.

- will be helpful to the Commission in fully considering the parties' respective arguments, and will not unduly complicate or disrupt this proceeding.
- 3. CAK expects to present testimony from Kip Bowmar, Executive Director. CAK may also choose to present testimony from other witnesses not yet identified.
- 4. CAK therefore respectfully requests that it be granted full intervenor status in this proceeding, including the right to present exhibits and testimony; cross-examine witnesses; submit arguments; and file briefs as allowed by the Commission.

OE F. CHILDERS

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ATTORNEY FOR COMMUNITY ACTION KENTUCKY, INC.

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been served on the following persons by United States mail on this the \_// day of August, 2008:

Lonnie E. Bellar Vice President – State Regulation E.ON U.S. Services, Inc. 220 West Main Street Louisville, Kentucky 40202

Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202

Hon. Michael L. Kurtz

Hon. Dennis G. Howard, II Assistant Attorney General Office of the Attorney General 1024 Capitol Center Drive, Suite 200 Frankfort, Kentucky 40601 Hon. Lisa Kilkelly Legal Aid Society 416 West Muhammad Ali Boulevard Suite 300 Louisville, Kentucky 40202

JOE F. CHILDERS