

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

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

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 807 KAR 5:001, Section 3(8)(b), the regulation that determines whether full intervention should be granted.

2. I have a personal interest in the quality of the air I breathe. It is hard to imagine an interest more deeply personal than my own internal airways and blood vessels and those of my wife. 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 LG&E's existing and planned power plants. As an environmentalist, I have an interest in reducing pollution that can harm other people and the natural environment.

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.

LG&E operates several power plants in Kentucky that emit various pollutants into the air. LG&E's Cane Run Station in Jefferson County has three old, coal-burning power plants with a combined capacity of 563 megawatts (MW), and the Mill Creek Station in the same county has four coal-burning power plants with a combined capacity of 1,472 MW. LG&E also operates a 383-MW coal-burning power plant in Trimble County.

(Kentucky's Electric Infrastructure: Present and Future, PSC, 2005, page 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, E.ON US LLC, which owns KU and LG&E, is presently building another coal-burning power plant in Trimble County.

3. Although general rate cases usually focus primarily on issues such as the revenue requirement, cost allocation, and the distribution of revenues among major customer classes, the Commission also routinely determines the utility's rate structures via rate cases. The rate structures, as embodied in Commission-approved tariffs, establish the economic incentives that will be faced by LG&E and its retail customers. As an environmentalist and a person specifically concerned with promoting improved energy efficiency, I have a special interest in the structures of the tariffs that will be established at the conclusion of this case, inasmuch as these rate structures will influence both the energy

consumption patterns of end-use customers and the willingness of LG&E and its customers to participate actively in demand-side management (DSM) programs. The energy consumption patterns that will result from the set of tariffs and economic incentives established in this proceeding are likely to affect the total amount of electricity consumed and the environmental impacts caused by the generation of that electricity. Although I am a retail customer of KU and not LG&E, the utilities are jointly owned and jointly develop and implement their DSM plans; it would not make sense to establish one rate structure for KU that encourages energy efficiency and a different rate structure for LG&E that penalizes the utility if customers save energy. I believe that these issues and concerns are not otherwise adequately represented by any of the other parties that have been granted full intervention to date.

4. My entire professional career has been devoted to the goal of improving the environment by helping to eliminate impediments to improving energy end-use efficiency in all sectors of Kentucky's economy. I worked for Kentucky's state energy office for 13 years, most of that time as the assistant director. I was the office's lead technical representative in LG&E's previous general rate case, Case No. 2003-00433, *An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company*. I represented the office in several IRP cases before the Commission, including Case No. 98-426, *Application of Louisville Gas and Electric Company for Approval of an Alternative Method of Regulation of Its Rates and Service*, and two joint IRPs submitted by KU and LG&E, Cases No. 99-430 and No. 2002-00367. 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

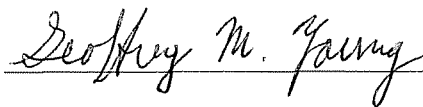
Commonwealth, and the Kentucky Conservation Committee. In order to build support for enhanced energy efficiency efforts among the energy utility community in Kentucky, in 2005 I initiated the formation of an informal organization called the Kentucky Energy Efficiency Working Group, which I currently 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.

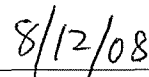
The Cumberland Chapter of the Sierra Club has decided that it will not seek intervention in this proceeding. To date, no other environmental or energy efficiency organization has requested full intervention. If the Commission were to deny this petition, it is likely that the interests of environmentalists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

5. 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 LG&E's tariffs and tariff structures, and abide by the procedural schedule the Commission has established for the conduct of this proceeding. I plan to present issues and develop facts that assist the Commission in fully considering the effects of various tariffs and rate structures in a constructive manner that does not unduly complicate or disrupt the proceedings.

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

Respectfully submitted,





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CERTIFICATE OF SERVICE

I hereby certify that an original and ten copies of the foregoing Petition to Intervene 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 12th day of August, 2008.

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E.ON US Services, Inc.
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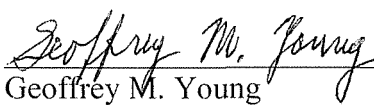
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Signed,


Geoffrey M. Young

8/12/08
Date