

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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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 PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM

Comes now, **PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM ("POWER")**, by counsel, and files this Motion for Full Intervention in the above-styled proceeding.

POWER is an unincorporated Kentucky nonprofit organization formed in the late 1980s to work for preservation of utility services for low-income households. Its members are low-income residential customers of Louisville Gas & Electric Co. ("LG&E"). POWER's address is P.O. Box 39143, Louisville, Kentucky 40233-9143.

POWER has a strong interest in this proceeding since LG&E rates impact the ability of low-income customers to afford utility service. POWER is very concerned that the rate increase to be considered in this proceeding will have an adverse impact on low-income customers who are already struggling to make ends meet. Affordable utility service is a critical issue for low-income communities.

POWER has extensive experience in Commission proceedings and other utility advocacy activities on behalf of low-income customers. The Commission has previously granted POWER status as a full intervenor in rate cases and other matters to advocate on

behalf of low-income households in the LG&E service area including LG&E's last several rate cases¹. POWER has been a Joint Applicant in each of the Applications for the Establishment of a Home Energy Assistance Program in the LG&E service territory which were approved by the Commission.² POWER has also been an active participant in LG&E's Demand Side Management Collaborative and Advisory Group.

POWER 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, POWER requests that it be granted full intervention as a party to this proceeding.

Respectfully submitted,


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¹ Recent cases in which POWER has intervened include: *An Investigation of the Energy and Regulatory Issues in Section 50 of Kentucky's 2007 Energy Act*, Administrative Case No. 2007-00477; *An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company*, Case No. 2003-00433; *An Examination of Louisville Gas and Electric Company's Prepaid Gas and Electric Service*, Case No. 2002-00232; *Demand Side Management 2000-2007 Program Plan of Louisville Gas & Electric Company and Kentucky Utilities Company*, Case No. 2000-459; and *An Adjustment of Gas Rates of Louisville Gas & Electric Company*, 2000-080.

² *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; *Joint Application of Louisville Gas & Electric Co., Metro Human Needs Alliance, 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. 2004-00304; *Joint Application of Louisville Gas & Electric, Metro Human Needs Alliance, People Organized and Working for Energy Reform, Kentucky Association for Community Action and Jefferson County for the Establishment of a Home Energy Assistance Program*, Case No. 2001-00323.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Full Intervention by People Organized and Working for Energy Reform was served on the following parties on the 28th day of July, 2008 by United States mail, postage prepaid.



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