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**PUBLIC SERVICE
COMMISSION**

Geoffrey M. Young
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September 24, 2008

PUBLIC SERVICE COMMISSION

Stephanie Stumbo, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard, PO Box 615
Frankfort, Kentucky 40602-0615

Re: Case No. 2008-00350

Dear Ms. Stumbo:

Please find attached for filing with the Commission an original and ten copies of a Petition to Intervene in the above-referenced proceeding.

Sincerely,



Geoffrey M. Young

Enclosures

cc: Parties listed on the Certificate of Service

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PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**THE JOINT APPLICATION PURSUANT TO 1994)
HOUSE BILL NO. 501 FOR THE APPROVAL OF)
KENTUCKY POWER COLLABORATIVE DEMAND-)
SIDE MANAGEMENT PROGRAMS, AND FOR)
AUTHORITY TO IMPLEMENT A TARIFF TO)
RECOVER COSTS, NET LOST REVENUES AND)
RECEIVE INCENTIVES ASSOCIATED WITH THE)
IMPLEMENTATION OF THE KENTUCKY POWER)
COLLABORATIVE DEMAND-SIDE)
MANAGEMENT PROGRAMS)**

**CASE NO.
2008-00350**

**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 the coal-fired power plants operated by American Electric Power d/b/a Kentucky Power Company (“Kentucky Power”) and other pollution-producing power plants that Kentucky Power may need to build or utilize in the future. As an environmentalist, I have an interest in reducing pollution that can harm 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.

Kentucky Power operates two coal-burning power plants in Lawrence County, Kentucky that emit various pollutants into the air. The two units at the Big Sandy Generating Station were built in 1963 and 1969 and have a combined capacity of 1,060 MW. (*Kentucky’s Electric Infrastructure: Present and Future*, PSC, 2005, page 15)

Kentucky’s weather patterns are such that on occasion, my wife and I are forced to breathe pollutants from these power plants that are potentially harmful to our health.

If Kentucky Power were able to reduce the amount of time these plants had to operate per year because of improved end-use efficiency in their customers’ homes and businesses, or if Kentucky Power were able to retire one or both of the plants sooner than expected and replace them with more sustainable supply-side and demand-side resources, the magnitude of environmental hazards arising from the utility’s operations would be

reduced. The subject of this proceeding is Kentucky Power's demand-side management (DSM) programs.

3. I am not aware of any other environmental or energy efficiency-oriented organization or individual who intends to request intervenor status in this case. I therefore believe that the special interests I have and the issues I plan to explore via full intervention are not otherwise adequately represented.

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, and served as the office's lead technical representative in several proceedings before the Commission relating to DSM, integrated resource planning, and tariff structures that affect the incentives of various parties to improve energy efficiency. These proceedings included:

- Case No. 2003-00434, *An Adjustment of the Electric Rates, Terms and Conditions of Kentucky Utilities Company.*
- Case No. 99-437, Integrated resource plan of Kentucky Power Company
- Case No. 2002-00377, Integrated resource plan of Kentucky Power Company
- Case No. 2000-459, *The Joint Application of the Louisville Gas and Electric Company and Kentucky Utilities Company for the Review, Modification and Continuation of DSM Programs and Cost Recovery Mechanisms.*

I represented the energy office on three demand-side management collaboratives, including the one hosted by Kentucky Power. (Resume available on request.) In these and other cases I believe I participated in a constructive manner that assisted the Commission

in fully considering the subject matter of each case without unduly complicating or disrupting the proceedings.

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. Kentucky Power has been sending representatives to the meetings of this group since its founding. In the context of this petition, however, I am not presenting myself as a representative of or spokesperson for any organization.

5. I am willing to present information in a clear and concise manner, and submit information requests and written comments that are directly relevant to the process of assisting the Commission in assessing the reasonableness of Kentucky Power's DSM programs. I do not believe my full intervention would unduly prejudice the rights of any other party. I would hope that Kentucky Power would find no reason to file any objections to this application for full intervention.

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

Respectfully submitted,

Geoffrey M. Young

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

9/24/08
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, PO Box 615, Frankfort, Kentucky 40602-0615, and that copies were mailed to the following parties on this 24th day of September, 2008.

Timothy C. Mosher
American Electric Power
101A Enterprise Drive
P.O. Box 5190
Frankfort, KY 40602

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

Signed,

Geoffrey M. Young

Geoffrey M. Young

9/24/08
Date