

#### LEGAL AID SOCIETY

PURSUING JUSTICE. RESTORING HOPE

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February 10, 2010

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602-0615 RECEIVED

FEB 1 1 2010

PUBLIC SERVICE COMMISSION

RE: In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY, INC. FOR AN ADJUSTMENT OF ELECTRIC AND GAS BASE RATES, CASE NO. 2009-00549

Dear Mr. Derouen:

Enclosed for filing in the above-captioned case are an original and twelve (12) copies of a Motion for Full Intervention by Association of Community Ministries ("ACM").

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy of this 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

Eileen Ordover

Attorneys for ACM

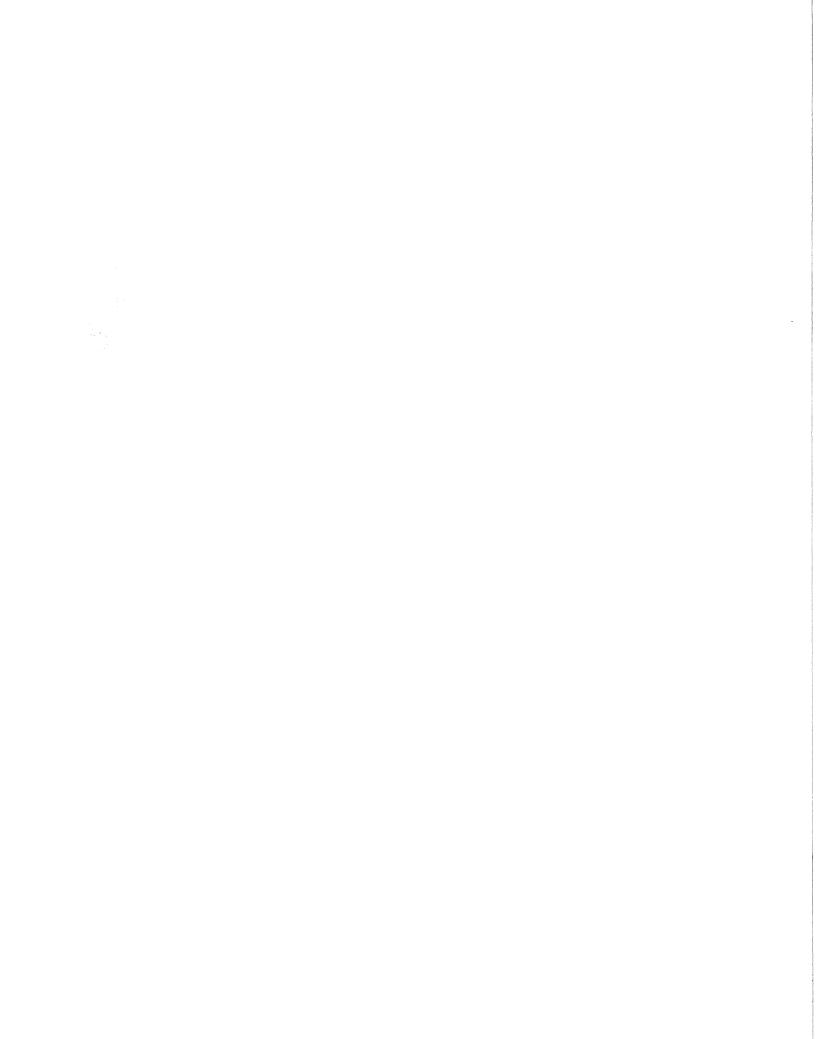
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Cc: parties of record









#### COMMONWEALTH OF KENTUCKY

RECEIVED

### BEFORE THE PUBLIC SERVICE COMMISSION

FEB 1 1 2010 PUBLIC SERVICE COMMISSION

In The Matter Of:

APPLICATION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY FOR AN ADJUSTMENT OF	)	CASE NO.
ELECTRIC AND GAS BASE RATES	)	2009-00549

# MOTION FOR FULL INTERVENTION BY ASSOCIATION OF COMMUNITY MINISTRIES

Pursuant to K.R.S. 278.310 and 807 KAR 5:001, Section 3(8), ASSOCIATION OF COMMUNITY MINISTRIES ("ACM"), by counsel, files this Motion for Full Intervention in the above-styled proceeding. ACM's address is P.O. Box 99545, Louisville, Kentucky 40269.

ACM is a Kentucky 501(c)(3) nonprofit corporation and its membership is comprised of 15 independent community ministries that provide services in the Louisville Metro area. The common mission for all 15 members is to provide an emergency assistance network in partnership with Louisville Metro Government, local congregations, and other businesses and organizations. Each community 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 provide both financial assistance and advocacy to low-income households who are threatened with disconnection of utility service by Louisville Gas & Electric Co. ("LG&E") because of their inability to pay utility bills. ACM members also implement the Winterhelp program.

ACM has a strong 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. 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 has participated in several matters before the Public Service Commission

including 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 and Application of Louisville Gas and Electric Company,

Inc. for an Adjustment of its Electric and Gas Base Rates, Case No. 2008-00252.

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.

The attorneys for ACM authorized to represent it in this proceeding and to take

service of all documents are:

Lisa Kilkelly

Eileen Ordover

LEGAL AID SOCIETY

416 West Muhammad Ali Blvd. Suite 300

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

Respectfully submitted,

Lisa Kilkelly

Eileen Ordover

LEGAL AID SOCIETY, INC.

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Louisville, Kentucky 40202

(502) 584-1254

Attorneys for ACM

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## **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 <u>16</u> day of February, 2010 by United States mail, postage prepaid.

<u>Lisa Kilkelly</u>

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

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Allyson K. Sturgeon Senior Corporate Attorney E.ON U.S. LLC 220 West Main Street Louisville, KY 40202

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