

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

THE 2011 JOINT INTEGRATED)
RESOURCE PLAN OF LOUISVILLE GAS)
AND ELECTRIC COMPANY AND)
KENTUCKY UTILITIES COMPANY)

DOCKET NO.
2011-00140

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 am a customer of Kentucky Utilities Company (“KU”). I have a special interest in the rates, services, and disservices provided by KU. Services include KU’s existing and planned demand-side management programs. By “disservices,” I mean the environmental externalities such as air and water pollution that result from the generation, transmission, and distribution of electricity from KU’s power plants and from the mining of fuel to supply these power plants. It should be noted that Kentucky’s Integrated Resource Planning (IRP) regulation requires KU and LG&E to report the following information:

“Actions to be undertaken during the fifteen (15) years covered by the plan to meet the requirements of the Clean Air Act amendments of 1990, and how these actions affect the utility's resource assessment” [807 KAR 5.058, Section 8(5)(f)]

This provision shows that environmental considerations are explicitly within the purview of the Commission in the context of IRP cases, including the current proceeding. The IRP regulation requires a full discussion of the utility's existing and planned energy conservation and load management and other demand-side programs. It also requires a description of the existing and projected amounts of electric energy and generating capacity from cogeneration, self-generation, and technologies relying on renewable resources, which produce different amounts of environmental externalities and impacts.

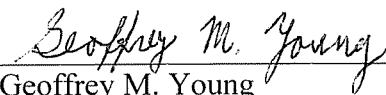
2. I have a special interest in this proceeding that is not otherwise represented. I am an environmentalist who has worked for over twenty years to improve the efficiency with which energy is used in Kentucky. I was employed by Kentucky's state energy office [at that time called the Kentucky Division of Energy (KDOE), later reorganized and renamed] for 13 years, most of that time as the Assistant Director. The mission of KDOE was to promote cost-effective improvements in energy efficiency and the use of renewable energy technologies in all sectors of Kentucky's economy. I was the division's lead staff person in several IRP cases before the Commission, including two of KU's and LG&E's joint IRPs. Since leaving state government in the fall of 2004, I have continued to work to help enhance energy efficiency in Kentucky by serving as a volunteer 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 an employee of Duke Energy. In the context of this petition, however, I am not presenting myself as a representative of or spokesperson for any organization.

3. As an employee of KDOE, I participated in Commission Cases No. 99-430 and No. 2002-00367. In both cases I participated in a constructive manner that assisted the Commission in fully considering the IRPs without unduly complicating or disrupting the proceedings. I also participated constructively in seven other IRP cases for Kentucky's other jurisdictional utilities.

4. If granted full intervention, I plan to present information in a clear and concise manner, submit information requests and written testimony and comments that are directly relevant to the process of assisting the Commission staff in assessing the reasonableness of KU's and LG&E's joint integrated resource plan, and abide by the procedural schedule the Commission will establish for the conduct of this proceeding. The fact that I have done these things on several previous occasions would lead a reasonable person to assume that I would do so again in this proceeding.

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

Respectfully submitted,


Geoffrey M. Young
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Lexington, KY 40503
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E-mail: energetic@windstream.net

5/13/11
Date

CERTIFICATE OF SERVICE

I hereby certify that an original and twelve copies of the foregoing Petition to Intervene were mailed to the office of Jeff Derouen, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, and that copies were mailed to the following parties on this 13th day of May, 2011. All envelopes were mailed with first-class postage prepaid.

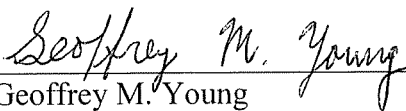
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Signed,


Geoffrey M. Young

5/13/11
Date