## Kentucky Resources Council, Inc.

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January 2, 2006

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PUBLIC SERVICE COMMISSION

Docket Coordinator Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

Re: Case No 2005-00458

In the Matter of the Application of East Kentucky Power Cooperative for A Certificate of Public Convenience And Necessity for Construction of a 138 kV Transmission Line in Rowan County, Kentucky

Dear Docket Clerk:

Enclosed please find for filing the original and ten (10) copies of a motion by Doug Doerrfeld for full intervention in the above captioned matter. Copies have been served on the listed counsel.

Thanks for your assistance in advance.

Cordially,

Tom FitzGerald

Counsel for Movant for Intervention Doug Doerrfeld

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY)POWER COOPERATIVE, INC. FOR)A CERTIFICATE OF PUBLIC)CONVENIENCE AND NECESSITY TO)CONSTRUCT A 138 KV TRANSMISSION LINE)IN ROWAN COUNTY, KENTUCKY)

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PUBLIC SERVICE COMMISSION

CASE NO. 2005-00458

## MOTION OF DOUG DOERRFELD FOR FULL INTERVENTION

Comes Doug Doerrfeld, (hereinafter "Doerrfeld") by counsel, and moves to intervene in this above-captioned proceeding as a full party. Pursuant to 807 KAR 5:001 Section 3(8), Doerrfeld respectfully requests that he be accorded the rights and privileges of a full intervenor in these proceedings, and in support thereof, states as follows:

1. Doerrfeld is a resident and property owner in Elliot County, Kentucky, whose P.O. Box 177, Elliotville, Kentucky 40317 on 662 L. Cooper Road. He is a customer and ratepayer of the Grayson Rural Electric Cooperative, which is a member cooperative of the East Kentucky Power Cooperative.

2. Doerrfeld lives in Elliot County and works and recreates in both Elliot and Rowan Counties, and has economic and aesthetic interests in the protection of the quality of life in his community.

3. This motion is timely, since it is filed within the time period established for Intervention in the *Appendix to An Order of The Kentucky Public Service Commission In Case No. 2005-00458 (December 16, 2005).*  4. Doerrfeld uses and enjoys the forest resources of the Daniel Boone National Forest in Rowan County, and has used and intends in the near future to use areas within the forest that are in proximity to the corridor that has been proposed for the construction of the 138 kV transmission line by Eastern Kentucky Power Cooperative. Doerrfeld has submitted comments and has participated in administrative proceedings before the U.S. Forest Service in opposition to proposed corridor, seeking instead more thorough consideration of alternatives that would have a lesser impact on ecological and scenic values and would avoid a wasteful duplication of transmission facilities and corridors. Doerrfeld's use and enjoyment of the forest for hiking and other recreational activities may be adversely affected by the construction and maintenance of the line, absent full and fair consideration of all reasonable alternative routing and configuration possibilities, including co-location along existing lines and existing rights-of-way.

5. The specific interests of Doerrfeld as a ratepayer and member of the cooperative system who is concerned with the minimization of the duplication of transmission lines and corridors with attendant aesthetic, recreational, property, and ecological damage may not be adequately represented by the other parties to this proceeding.

6. Doerrfeld has been previously granted the status of full intervenor in the related case No. 2005-00089, which case resulted in a denial of the requested CPCN and the subsequent denial of a request by EKPC for rehearing of that order. This application proposes again the same transmission line corridor.

WHEREFORE, Movant Doug Doerrfeld requests that he be accorded the status of full Intervenor, and that each party to the case be directed to serve upon Doerrfeld and his undersigned counsel, all pleadings and information requests that are filed in this case from the date of granting of intervenor status forward.

Respectfully submitted,

Tom FitzGenald P.O. Box 1070 Frankfort, Kentucky 40602 (502) 875-2428

Counsel for Movant for Intervention Doug Doerrfeld

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed by facsimile and that the original and 10 copies have been mailed this day to the Commission and served by first-class mail upon the following individuals this 2nd day of January, 2006:

Honorable A.W. Turner **Public Service Commission** 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602

Honorable Sherman Goodpaster III East Kentucky Power Cooperative 4775 Lexington Road P. O. Box 707 Winchester, KY 40392-0707

Hon. Greg Stumbo Attorney General State Capitol Frankfort, Kentucky 40601

Tom FitzGerald