

LEBOEUF, LAMB, GREENE & MACRAE LLP

200 NORTH THIRD STREET, SUITE 300

P.O. Box 12105

HARRISBURG, PA 17108-2105

(717) 232-8199

FACSIMILE: (717) 232-8720

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FROM: Scott H. DeBroff	5984	DATE: May 5, 2006
TEL: 717-232-8199	PAGES: 1 of 9	CLIENT/MATTER NO.: 12027/00001

TO:	COMPANY:	FAX NO.:	CONFIRMING TELEPHONE NO.:
Beth O'Donnell	Kentucky Public Service Comm./	502-564-3460	502-564-3940

Comments/Message:

Following is the original of the Petition to Intervene of the Kentucky Industrial Utility Customers, Inc. on behalf of Cellnet Technology, Inc. and Hunt Technologies, Inc.

The original and 10 copies will follow by mail.

LEBOEUF, LAMB, GREENE & MACRAE LLP

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200 NORTH THIRD STREET, SUITE 300
 P.O. Box 12105
 HARRISBURG, PA 17108-2105
 (717) 232-8199
 FACSIMILE: (717) 232-8720

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May 5, 2006

Beth A. O'Donnell, Executive Director
 Kentucky Public Service Commission
 211 Sower Boulevard
 Frankfort, KY 40602

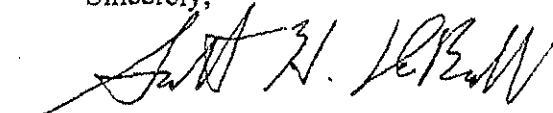
RE: **Case No. 2006-00045 Expedited Petition To Intervene of
 Cellnet Technology, Inc. and Hunt Technologies, Inc.**

Dear Ms. O'Donnell:

Please find enclosed the original and ten (10) copies of the Petition to Intervene of Cellnet Technology, Inc. and Hunt Technologies, Inc. in the above-referenced matter. Cellnet and Hunt request expedited review of the Petition in order to participate as an active party at the May 10th Informal Conference at the KPSC.

By copy of this letter, all parties listed on the attached Certificate of Service have been served. Please place these documents on file.

Sincerely,



Scott H. DeBroff, Esquire
 Counsel for Cellnet Technology, Inc.
 and Hunt Technologies, Inc.

SHD/bla

Cc: Certificate of Service

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:
CONSIDERATION OF THE REQUIREMENTS
OF THE FEDERAL ENERGY POLICY ACT
OF 2005 REGARDING TIME-BASED
METERING, DEMAND RESPONSE, AND
INTERCONNECTION SERVICE**

CASE No. 2006-00045

**PETITION TO INTERVENE
OF
CELLNET TECHNOLOGY, INC. AND HUNT TECHNOLOGIES, INC.**

AND NOW COMES **Scott H. DeBroff, Esquire** of **LeBoeuf, Lamb, Greene & MacRae LLP**, on behalf of his clients, **Cellnet Technology, Inc. ("Cellnet")** and **Hunt Technologies, Inc. ("Hunt")** for the purpose of this "Petition For Full Intervention" with respect to the proceedings of the Kentucky Public Service Commission ("KPSC" or the "Commission") regarding this proceeding to permit the Commission to consider the requirement of the Federal Energy Policy Act of 2005 regarding time-based metering, demand response and interconnection service and, with respect, avers the following:

1. Cellnet Technology, Inc. ("Cellnet") is a party interested in the above-captioned docket as it is a meter technology provider which has participated extensively in rulemaking proceedings in other states involving the implementation of the Energy Policy Act of 2005, specifically the Smart Metering and Demand Response provisions beginning at Section 1252 of the Electricity Title of the Act.

2. Cellnet Technology, Inc., with its headquarters in Atlanta, Georgia, supplies natural gas, water, and electric utilities with highly reliable, field-proven products that enable them to communicate with residential and commercial and industrial (C&I) meters using wireless and IP network communications.

3. Hunt Technologies Inc. ("Hunt") is also a party interested in the above-captioned docket as it is a meter technology provider which has participated extensively in rulemaking proceedings in other states involving the implementation of the Energy Policy Act of 2005 as well.

4. Hunt Technologies Inc., with its international headquarters in Pequot Lakes, Minnesota, provides electric, water, and natural gas automated meter reading systems for Investor-Owned Utilities, Rural Electric Cooperatives, and Municipal Governments.

5. Hunt and Cellnet have been involved extensively in a number of EPACT related smart metering proceedings across the country before other state public utility commissions. Our interest in intervening in this proceeding is to inform and educate the Commission on the issues of smart metering technology and demand response and the value to both utilities and customers.

6. Cellnet and Hunt have a substantial and bona fide interest in the subject matter of this docket and their interests cannot be represented or protected adequately by other existing parties to this docket.

7. Cellnet and Hunt intend to play a constructive role in the Commission's decision-making process herein and their participation will not unduly prejudice any party.

8. Cellnet and Hunt respectfully request that their "Petition for Full Intervention" be given expedited review and that they be granted full party status in this case and placed on the Commission's Official Service List for this docket.

9. All communications and pleadings in this docket should be directed to:

Scott H. DeBroff, Esquire
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
200 North Third Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105

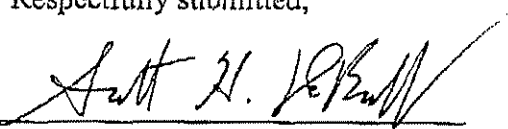
Tel: (717) 232-6453
Fax: (717) 232-8720
eMail: sdebloff@llgm.com

WHEREFORE, Cellnet and Hunt request that they be granted Full Intervenor Status in the above captioned proceeding.

Respectfully submitted,

Dated: **May 5, 2006**

By:


Scott H. DeBroff, Esquire
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
200 North Third Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105

Tel: (717) 232-6453
Fax: (717) 232-8720
eMail: sdebloff@llgm.com

**Counsel for Cellnet Technology, Inc. and
Hunt Technologies, Inc.**

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:
CONSIDERATION OF THE REQUIREMENTS
OF THE FEDERAL ENERGY POLICY ACT
OF 2005 REGARDING TIME-BASED
METERING, DEMAND RESPONSE, AND
INTERCONNECTION SERVICE**

CASE NO. 2006-00045

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent by U.S. First Class mail, facsimile, electronically or hand delivery, to all parties of record in this proceeding:

Allen Anderson
South Kentucky R.E.C.C.
P. O. Box 910
925-929 N. Main Street
Somerset, KY 42502-0910

Mark A. Bailey
Kenergy Corp.
3111 Fairview Drive
P. O. Box 1389
Owensboro, KY 42302

Michael S. Beer
VP - Rates & Regulatory
Kentucky Utilities Company
c/o Louisville Gas & Electric Co.
P. O. Box 12010
Louisville, KY 40232-2010

Honorable Jason R. Bentley
Attorney at Law
McBryer, McGinnis, Leslie
& Kirkland PLLC
305 Ann Street
Suite 308
Frankfort, KY 40601

Kent Blake
Director- State Regulation and Rates
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

Honorable David F. Boehm
Attorney at Law
Bashm, Kirtz & Lowry
36 East Seventh Street
2110 CBED Building
Cincinnati, OH 45202
dfoehm@bklhwfirm.com

Dudley Bottom, Jr.
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40165

Daniel W. Brewer
Blue Grass Energy Cooperative Corp.
P. O. Box 990
1201 Lexington Road
Nicholsville, KY 40340-0990

Jackie B. Browning
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

Sharon K. Carson
Finance & Accounting Manager
Jackson Energy Cooperative
P. O. Box 307
U. S. Highway 4215
McKee, KY 40447

Honorable Elizabeth L. Cavanaugh
Senior Corporate Attorney
Kentucky Utilities Company
c/o Louisville Gas & Electric Co.
P. O. Box 32010
Louisville, KY 40232-2010

Lawrence Cook
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capitol Center Drive
Suite 200
Frankfort, KY 40601-8204
Larry.Cook@ag.ky.gov

Michael H. Core
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

Paul O. Emba
Clark Energy Cooperative, Inc.
P. O. Box 748
2640 Ironworks Road
Winchester, KY 40392-0748

Carol H. Finley
President and CEO
Crayson R.E.C.C.
109 Bagby Park
Gryson, KY 41143

James B. Griner
Legal Division
The Union Light, Heat and Power
Company
139 East Fourth Street
Cincinnati, OH 45202

Ted Hampton
Cumberland Valley Electric, Inc.
Highway 25E, P. O. Box 440
Gry, KY 40734

Larry Hieck
Salt River Electric Cooperative
Corp.
111 West Brashear Avenue
P. O. Box 609
Bardonia, KY 40004

Kerry K. Howard
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

James L. Jacobus
Inger-County Energy Cooperative
Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

Honorable Tyson A. Kamuf
Attorney at Law
Sullivan, Mountjoy, Stainback
& Miller, PSC
100 St. Ann Street
P.O. Box 727
Owensboro, KY 42302-0727

Honorable Lisa Kilkelly
 Attorney at Law
 Legal Aid Society
 425 West Muhammad Ali Boulevard
 Louisville, KY 40202
 lkilkelly@lasla.org

Robert M. Marshall
 Owen Electric Cooperative, Inc.
 8205 Highway 127 North
 P. O. Box 400
 Owenton, KY 40359

Burns E. Mercer
 Mendon County R.E.C.C.
 P. O. Box 489
 Brandenburg, KY 40108-0489

Michael L. Miller
 President & CEO
 Nolin R.E.C.C.
 411 Ring Road
 Elizabethtown, KY 42701-8701

Honorable James M. Miller
 Attorney at Law
 Sullivan, Mountjoy, Strutback
 & Miller, PSC
 100 St. Ann Street
 P. O. Box 727
 Owensboro, KY 42303-0727
 jmillier@smsmlaw.com

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

Barry L. Myers
 Manager
 Taylor County R.E.C.C.
 100 West Main Street
 P. O. Box 100
 Campbellsville, KY 42719

G. Kelly Nuckols
 Jackson Purchase Energy Corporation
 2900 Irvin Cobb Drive
 P. O. Box 4030
 Paducah, KY 42002-4030

Anthony P. Overbey
 Fleming-Muson Energy Cooperative
 P. O. Box 228
 Flemingsburg, KY 41041

Honorable Mark R. Overstreet
 Attorney at Law
 Sites & Harblson
 421 West Main Street
 P. O. Box 634
 Frankfort, KY 40602-0634
 moverstreet@sites.com

Roy M. Palk
 East Kentucky Power Cooperative,
 Inc.
 4775 Lexington Road
 P. O. Box 707
 Winchester, KY 40392-0707

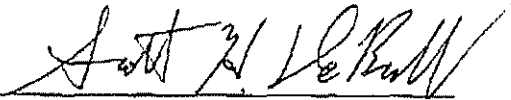
Honorable Kendrick R. Riggs
 Attorney at Law
 Stoll Keenon Ogden PLLC
 1700 PNC Plaza
 500 West Jefferson Street
 Louisville, KY 40202
 kendrick.riggs@skolirm.com

Bobby D. Sexton
 President/General Manager
 Big Sandy R.E.C.C.
 504 11th Street
 Palmito, KY 41260-1422

David A. Spahnhoward
 Vice President
 Big Rivers Electric Corporation
 201 Third Street
 P. O. Box 24
 Henderson, KY 42420
 dspahnhoward@bigrivers.com

Dated: May 5, 2006

Respectfully submitted,

By: 

Scott H. DeBroff, Esquire
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
200 North Third Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105

Tel: (717) 232-6453
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eMail: sdebloff@llgm.com

**Counsel for Cellnet Technology, Inc. and
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