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August 20, 2007

Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RECEIVED

AUG 21 2007

PUBLIC SERVICE
COMMISSION

RECEIVED

AUG 21 2007

PUBLIC SERVICE
COMMISSION

Re: **Objection of Kentucky Association for Community Action, Inc.
to Full Intervention by Robert L. Madison**

AND

**Motion To Strike Data Request of Robert L. Madison Directed
to Kentucky Association for Community Action, Inc.**

Public Service Commission, Case No. 2007-00337

Dear Ms. O'Donnell:

At the request of Joe Childers, I am enclosing an original and ten copies of each of the above-captioned pleadings. Also enclosed is an extra copy of each to "date-stamp" and return to me for our file. A postage-paid envelope is enclosed for that purpose.

Thank you for your assistance. Please call me at (859) 259-1900, ext. 33 if you have questions regarding the enclosed.

Sincerely,



Patricia Pruitt
Secretary to Joe F. Childers, Esq.

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 21 2007

PUBLIC SERVICE
COMMISSION

IN RE:

JOINT APPLICATION TO LOUISVILLE GAS)
AND ELECTRIC COMPANY, ASSOCIATION OF)
COMMUNITY MINISTRIES, PEOPLE ORGANIZED)
AND WORKING FOR ENERGY REFORM, AND) CASE NO. 2007-00337
KENTUCKY ASSOCIATION FOR COMMUNITY)
ACTION, FOR THE ESTABLISHMENT OF A)
HOME ENERGY ASSISTANCE PROGRAM)

**OBJECTION OF KENTUCKY ASSOCIATION FOR
COMMUNITY ACTION, INC. TO FULL
INTERVENTION BY ROBERT L. MADISON**

Comes the Kentucky Association for Community Action, Inc. ("KACA"), by and through counsel, and hereby objects to the intervention as a full party by Robert L. Madison. In support of this motion, KACA states that Mr. Madison's interests in this proceeding, if any, are fully and adequately represented by the Kentucky Attorney General, who has been granted full intervention by the Commission.

The intervention by Mr. Madison is not likely to raise new and independent matters to which the Commission should be directed and which may be helpful to the Commission. On the contrary, the intervention by Mr. Madison is likely to cause the parties and the Commission considerable undue delay in this time-sensitive matter. This is well illustrated by the numerous data requests served by Mr. Madison before he has been granted the right to intervene as a full party, and directed to organizations other than the Company, which has not been authorized by prior Orders of the Commission.

For the foregoing reasons, KACA submits that the Commission should deny the request of Robert L. Madison to intervene as a full party in this matter.

RESPECTFULLY SUBMITTED,


JOE F. CHILDERS

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1900 Lexington Financial Center
250 West Main Street
Lexington, Kentucky 40507
(859) 259-1900
(859) 259-1909

COUNSEL FOR KACA

CERTIFICATE OF SERVICE

True copies of the foregoing Objection Of Kentucky Association For Community Action, Inc. To Full Intervention By Robert L. Madison have been served on the parties by mailing the same to:

Kent W Blake
Vice President, State Regulation & Rates
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, KY 40202

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

Honorable Lisa Kilkelly
Attorney at Law
Legal Aid Society
416 West Muhammad Ali Boulevard
Suite 300
Louisville, KY 40202

Honorable Kendrick R Riggs

Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

Honorable Allyson K Sturgeon
Attorney at Law
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, KY 40202

Robert L. Madison
5407 :Baywood Drive
Louisville, Kentucky 40241-1318

on this the 20th day of August, 2007.


COUNSEL FOR KACA

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
AUG 21 2007
PUBLIC SERVICE
COMMISSION

IN RE:

JOINT APPLICATION TO LOUISVILLE GAS)
AND ELECTRIC COMPANY, ASSOCIATION OF)
COMMUNITY MINISTRIES, PEOPLE ORGANIZED)
AND WORKING FOR ENERGY REFORM, AND)
KENTUCKY ASSOCIATION FOR COMMUNITY)
ACTION, FOR THE ESTABLISHMENT OF A)
HOME ENERGY ASSISTANCE PROGRAM)

CASE NO. 2007-00337

MOTION TO STRIKE DATA REQUEST OF
ROBERT L. MADISON DIRECTED TO KENTUCKY
ASSOCIATION FOR COMMUNITY ACTION, INC.

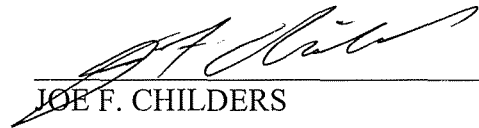
Comes the Kentucky Association for Community Action, Inc. (“KACA”), by and through counsel, and hereby moves the Commission to strike the “Data Request of Robert L. Madison,” filed with the Commission on August 20, 2007 and served the same day on counsel for KACA. In support of this motion, KACA states:

1. Mr. Madison has not been permitted by the Commission to intervene in this matter affording him all of the rights of a party; and
2. Even if Mr. Madison is permitted to intervene and granted all the rights of a party, the procedural schedule set forth by the Commission does not permit the filing of data requests directed to KACA, but only data requests directed to Louisville Gas and Electric Company (“LG&E”).

By separate pleading, KACA has objected to the intervention of Mr. Madison as a

party to this proceeding and states that Mr. Madison should be free to file comments with the Commission in the form of public comments.

RESPECTFULLY SUBMITTED,


JOE F. CHILDERS

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250 West Main Street
Lexington, Kentucky 40507
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(859) 259-1909

COUNSEL FOR KACA

CERTIFICATE OF SERVICE

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Kent W Blake
Vice President, State Regulation & Rates
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, KY 40202

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Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
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Attorney at Law
Legal Aid Society
416 West Muhammad Ali Boulevard
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Stoll Keenon Ogden, PLLC
2000 PNC Plaza
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Attorney at Law
E.ON U.S. Services, Inc.
220 West Main Street
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Robert L. Madison
5407 :Baywood Drive
Louisville, Kentucky 40241-1318

on this the 20th day of August, 2007.


COUNSEL FOR KACA