

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
AUG 20 2007
PUBLIC SERVICE
COMMISSION

IN THE MATTER OF :

JOINT APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY, ASSOCIATION OF)
COMMUNITY MINISTRIES, PEOPLE ORGANIZED &)
WORKING FOR ENERGY REFORM AND) CASE 2007 - 00337
KENTUCKY ASSOCIATION FOR COMMUNITY)
ACTION FOR THE ESTABLISHMENT OF A)
HOME ENERGY ASSISTANCE PROGRAM)

REQUEST OF ROBERT L. MADISON FOR FULL INTERVENTION

I REQUEST FULL INTERVENTION IN PSC CASE NO. 2007-00337, WHICH CONCERNS THE ESTABLISHMENT OF A HOME ENERGY ASSISTANCE PROGRAM (HEA) IN THE LOUISVILLE GAS AND ELECTRIC SERVICE TERRITORY.

I AM AN ELECTRIC ONLY RESIDENTIAL CUSTOMER OF LG&E. I HAVE BEEN PREVIOUSLY GRANTED FULL INTERVENTION IN THE FOLLOWING PSC CASES:

1. 98-426 PBR.
2. 2000-095 POWERGEN MERGER.
3. 2000-080 GAS INCREASE.
4. 2000-386 POLLUTION EQUIPMENT.
5. 2001-104 E.ON.
6. ADMINISTRATIVE 387 KY ADEQUACY OF GENERATION & TRANSMISSION.
7. 2001-323 HOME ENERGY ASSISTANCE.
8. 2002-00147 POLLUTION EQUIPMENT.
9. 2004-00029 ACQUISITION OF OLDHAM COUNTY SEWER DISTRICT.

IN ACCORDANCE WITH 807 KAR 5:0001 (3) (8), I FEEL THAT I HAVE A SPECIAL INTEREST IN THIS PROCEEDING WHICH IS NOT OTHERWISE ADEQUATELY REPRESENTED AND / OR THAT I AM LIKELY TO PRESENT ISSUES OR DEVELOP FACTS THAT WILL ASSIST THE PSC WITHOUT COMPLICATING OR DISRUPTING THE PROCEEDINGS.

I WAS GRANTED FULL INTERVENTION IN CASE 2001 - 323. THE CURRENT CASE IS A CONTINUATION OF THE PREVIOUS CASE. MANY OF THE ISSUES & RECOMMENDATIONS THAT I MADE IN THE PREVIOUS CASE WERE APPROVED BY THE PSC.

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DATE: 17 AUG 2007

I ALSO ASSERT THAT, UNDER KRS 278.285 (f) (1), I AM A CUSTOMER REP. I HAVE BEEN GRANTED INTERVENTION IN RESIDENTIAL PSC CASES CONCERNING BASE RATE CHANGES, HEA, SEWAGE, ACQUISITIONS, THE TRANSMISSION GRID, ETC. THIS IS ANOTHER LEGAL REASON FOR THE PSC TO GRANT MY FULL INTERVENTION REQUEST.

SOME OF THE ISSUES THAT NEED TO BE REVIEWED, INCLUDE, BUT ARE NOT LIMITED, TO :

1. WHAT WAS THE ROLE OF THE AG IN DEVELOPING THIS PLAN ? WHAT IS THE AG'S POSITION ON THE SPECIFIC ISSUES ?
2. IS A FIVE YEAR HEA THE APPROPRIATE LENGTH OF TIME ?
3. IS THERE A SUBSIDIZATION OF GAS / ELECTRIC CUSTOMERS IN THE DISTRIBUTION OF THE FUNDS ?
4. SHOULD LG&E CONTRIBUTE SOME OF THE HEA FUNDS IN ORDER FOR THE PSC TO APPROVE THE PLAN ?
5. WHAT STEPS ARE BEING TAKEN TO ENSURE THAT CUSTOMERS THAT LIVE IN APARTMENTS PAYING THE COMMERCIAL RATE ARE NOT RECEIVING FUNDS THAT ARE PAID BY RESIDENTIAL CUSTOMERS ?
6. ARE THE FUNDS BEING DISTRIBUTED FAIRLY TO THE DIFFERENT COUNTIES OF THE LG&E SERVICE AREA ?

IN PREVIOUS PSC CASES I HAVE PARTICIPATED IN DATA REQUESTS, PRESENTED WRITTEN AND ORAL TESTIMONY, ASKED QUESTIONS AT THE HEARINGS AND FILED BRIEFS.

I CERTIFY THAT ON 17 AUG 2007, COPIES OF THIS LETTER WERE MAILED REGULAR MAIL TO THE PSC.

SINCERELY,



ROBERT L. MADISON
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