

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**RECEIVED**  
DEC 21 2007  
PUBLIC SERVICE  
COMMISSION

**In The Matter Of:**

<b>AN INVESTIGATION OF THE</b>	)	
<b>ENERGY AND REGULATORY</b>	)	<b>ADMINISTRATIVE</b>
<b>ISSUES IN SECTION 50 OF</b>	)	<b>CASE NO. 2007-00477</b>
<b>KENTUCKY'S 2007 ENERGY ACT</b>	)	

**MOTION FOR FULL INTERVENTION**  
**BY PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM**

Comes now, **PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM ("POWER")**, by counsel, and files this Motion for Full Intervention in the above-styled proceeding.

POWER is an unincorporated Kentucky nonprofit organization formed in the late 1980s to work for preservation of utility services for low-income households. Its members are low-income residential customers of Louisville Gas & Electric Co. ("LG&E") POWER's address is P.O. Box 39143, Louisville, Kentucky 40233-9143.

POWER has an interest in how the issues identified by the General Assembly for consideration in this proceeding may affect low-income utility customers. Issues relating to demand management strategies have the potential to affect low-income households through cost allocation issues, the availability of specific programs for low-income customers, such as low-income weatherization programs, and the accessibility of demand management programs in general to low-income customers. Issues relating to rate structures and cost recovery are of interest to POWER since affordable utility service is a critical issue for low-income communities.

POWER has extensive experience in Commission proceedings and other utility advocacy activities on behalf of low-income customers. The Commission previously granted POWER status as a full intervenor in rate cases to lower utility bills and to advocate for programs to assist low-income households in the LG&E service area<sup>1</sup>. POWER has been a Joint Applicant in each of the Applications for the Establishment of a Home Energy Assistance Program in the LG&E service territory which were approved by the Commission.<sup>2</sup> POWER has also been an active participant in LG&E's Demand Side Management Collaborative and Advisory Group.

POWER represents an interest that is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

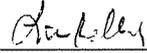
WHEREFORE, POWER requests that it be granted full intervention as a party to this proceeding.

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<sup>1</sup> Recent cases in which POWER has intervened include: *An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company*, Case No. 2003-00433; *An Examination of Louisville Gas and Electric Company's Prepaid Gas and Electric Service*, Case No 2002-00232; *Demand Side Management 2000-2007 Program Plan of Louisville Gas & Electric Company and Kentucky Utilities Company*, Case No. 2000-459; and *An Adjustment of Gas Rates of Louisville Gas & Electric Company*, 2000-080.

<sup>2</sup> *Joint Application of Louisville Gas & Electric Co., Association of Community Ministries, Inc., People Organized and Working for Energy Reform and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program*, Case No. 2007-00337; *Joint Application of Louisville Gas & Electric Co., Metro Human Needs Alliance, Inc., People Organized and Working for Energy Reform and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program*, Case No. 2004-00304; *Joint Application of Louisville Gas & Electric, Metro Human Needs Alliance,*

Respectfully submitted,



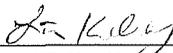
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Full Intervention by People Organized and Working for Energy Reform was served on the following parties on the 19<sup>th</sup> day of December, 2007 by United States mail, postage prepaid.

  
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