

intervention by the party is likely to present issues or to develop facts that will assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings, such person shall be granted full intervention.

In a recent proceeding, the Commission reaffirmed that this regulation affords two alternative bases for seeking status as a full intervenor, i.e., that it is not necessary for the petitioner to meet both criteria. [Order, 4/19/07, page 2, Case No. 2006-00564, An Investigation into East Kentucky Power Cooperative, Inc.'s Continued Need for Certificated Generation.] If the Commission, upon due deliberation, were to determine either: a) that an individual has a special interest in this proceeding which is not otherwise adequately represented; or b) that full intervention by the petitioner is likely to present issues or to develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings; or c) both, then the petitioner should be granted full intervention. The following grounds have been separated into two distinct categories – those grounds that are pertinent to my claim that I have a special interest in this proceeding which is not otherwise adequately represented (ground number 2 below), and those grounds that are pertinent to my claim that I am likely to present issues or to develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings (grounds number 3 through 5 below).

2. [re special interest not otherwise represented] My interest in this proceeding is to help eliminate impediments to the enhancement of energy end-use efficiency in all sectors of Kentucky's economy. My entire professional career has been devoted to this goal, most evidently as an employee of Kentucky's state energy office for 13 years. Since leaving state government in the fall of 2004, I have continued to work to help enhance energy efficiency in Kentucky by volunteering with organizations such as the Sierra Club,

Kentuckians for the Commonwealth, and the Kentucky Conservation Committee. In order to build support for enhanced energy efficiency efforts among the energy utility community in Kentucky, in 2005 I initiated the formation of an informal organization called the Kentucky Energy Efficiency Working Group, which I currently co-chair with Dick Stevie of Duke Energy. In the context of this request, however, I am not presenting myself as a representative of or spokesperson for any organization. Although most of the other parties and potential parties to this proceeding probably deal with energy efficiency in various ways in the course of their ongoing activities, I am not aware that any organization that is currently an intervenor or is likely to request intervention is as focused on energy efficiency in such a single-minded way.

3. [re presenting information without complicating the proceedings] On page 1 of its Order initiating this case, the Commission listed the four technical energy and regulatory issues set forth in Section 50 of the 2007 Energy Act. In the course of my professional work and volunteer work since leaving state government, I have had occasion to research, analyze, and write about aspects of several of the enumerated issues. I believe I have some experience, knowledge and considered perspectives that relate to each of the four issues, and I am prepared to do additional research, write up whatever information appears pertinent, and present it to the Commission and its consultant in a responsive, timely and constructive manner.

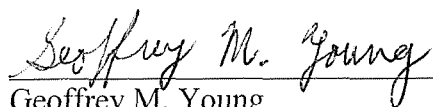
4. [re presenting information without complicating the proceedings] The Commission has engaged a consultant, Overland Consulting, to assist in its investigation of the issues. [Order, 11/20/07] On December 3, 2007, the consultant sent an email to potential stakeholders containing an extensive set of questions designed to elicit a wide range of information. Having reviewed these questions, I believe I would have pertinent

responses to provide to many of them, which could be helpful to the consultants as they go about their work. In the context of these questions, I have taken part in several IRP proceedings, been a member of three DSM collaboratives for several years, developed testimony about various DSM cost recovery methods and related rate structures, analyzed certain impediments to potential developers of non-utility generation, and considered several of the other topics raised by the consultants. I am willing and able to present my information and perspectives in a concise manner that should not burden the consultants or the Commission with large volumes of extraneous material.

5. [re presenting information without complicating the proceedings] I am willing to abide by the procedural schedule that has been established by the Commission in this proceeding.

WHEREFORE, I respectfully request that I be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,



Geoffrey M. Young
454 Kimberly Place
Lexington, KY 40503
Phone: 859-278-4966
E-mail: energetic@windstream.net

12/10/07
Date

CERTIFICATE OF SERVICE

I hereby certify that an original and ten copies of the foregoing Petition to Intervene were delivered to the office of Beth A. O'Donnell, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, and that copies were mailed to the following Parties of Record, on this 10th day of December, 2007.

Hon. Dennis Howard
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Mr. David Spainhoward
Big Rivers Electric Corporation
P.O. Box 24
Henderson, KY 42420

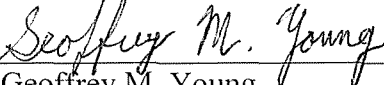
Hon. Charles A. Lile
Senior Corporate Counsel
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P.O. Box 707
Winchester, KY 40392-0707

Duke Energy
Department of Regulatory Affairs
139 E 4th Street
Cincinnati, OH 45202

John Wolfram, Regulatory Affairs
LG&E Energy (E.ON)
220 W. Main Street
P.O. Box 32030
Louisville, KY 40232

Hon. Michael L. Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202-4434

Signed,



Geoffrey M. Young