

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

August 29, 2008

PUBLIC SERVICE COMMISSION


Stephanie Stumbo, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard, PO Box 615
Frankfort, Kentucky 40602-0615

Re: Case No. 2008-00248

Dear Ms. Stumbo:

Please find attached for filing with the Commission an original and ten copies of a Petition to Intervene in the above-referenced proceeding.

Sincerely,



Geoffrey M. Young

Enclosures

cc: Parties listed on the Certificate of Service

RECEIVED

SEP - 2 2008

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
SEP 02 2008
PUBLIC SERVICE
COMMISSION

In the Matter of:

THE 2008 INTEGRATED RESOURCE PLAN) CASE NO.
OF DUKE ENERGY KENTUCKY, INC.) 2008-00248

PETITION TO INTERVENE
OF GEOFFREY M. YOUNG

Pursuant to KRS 278.310 and 807 KAR 5:001 Section 3(8), I, Geoffrey M. Young, respectfully request that the Commission grant me full intervenor status in the above-captioned proceeding and state my support thereof as follows:

1. I believe that this petition meets the requirements of both prongs of 807 KAR 5:001, Section 3(8)(b), the regulation that determines whether full intervention should be granted.

2. I have a personal interest in the quality of the air I breathe. It is hard to imagine an interest more deeply personal than my own internal airways and blood vessels and those of my wife. The quality of air we breathe is likely to affect the amount of money my wife and I will be forced to spend in future years to treat health problems that we may suffer because of Duke Energy Kentucky's ("Duke's") existing and planned power plants. As an environmentalist, I have an interest in reducing pollution that can harm people and the natural environment.

The environmental impacts of coal-fired power plants are massive. Burning coal in Kentucky's power plants contributes to some of the worst air pollution in the Midwest. Louisville and Northern Kentucky have some of the highest rates of respiratory disease, including childhood asthma, of any metropolitan area in the region. Mercury pollution from coal-burning power plants is a significant health problem, especially for fetuses and young children. In addition, the carbon dioxide released to the atmosphere when coal is burned contributes to global warming.

Duke operates a power plant in Boone County, Kentucky that emit various pollutants into the air. The Unit 1 coal-burning power plant at the East Bend Generating Station was built in 1981 and has a capacity of 414 MW. (*Kentucky's Electric Infrastructure: Present and Future*, PSC, 2005, page 16) Kentucky's weather patterns are such that on occasion, my wife and I are forced to breathe pollutants from this power plant that are potentially harmful to our health.

If Duke were able to reduce the amount of time this plant had to operate per year because of improved end-use efficiency in their customers' homes and businesses, or if Duke were able to retire the plant sooner than expected and replace it with more sustainable supply-side and demand-side resources, the magnitude of environmental hazards arising from the plant would be reduced.

3. I have learned that the Cumberland Chapter of the Sierra Club does not plan to request intervenor status in this case, and I am not aware of any other environmental or energy efficiency-oriented organization or individual who intends to do so. I therefore believe that the special interests I have and the issues I plan to explore via full intervention are not otherwise adequately represented.

4. My entire professional career has been devoted to the goal of improving the environment by helping to eliminate impediments to improving energy end-use efficiency in all sectors of Kentucky's economy. I worked for Kentucky's state energy office for 13 years, most of that time as the assistant director. I was the office's lead technical representative in Case No. 99-449, *In the Matter of: A Review Pursuant to 807 KAR 5:058 of the 1999 Integrated Resource Plan of the Union Light, Heat and Power Company* and submitted comments on that IRP on behalf of the Division. I was the Division's representative in seven other IRP cases and on three demand-side management collaboratives, including the one hosted by the Union Light, Heat and Power Company. (Resume available on request.) In these and other cases I believe I participated in a constructive manner that assisted the Commission in fully considering the subject matter of each case without unduly complicating or disrupting the proceedings.

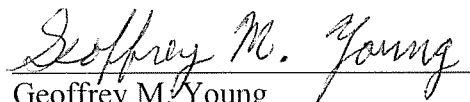
Since leaving state government in the fall of 2004, I have continued to work to help enhance energy efficiency in Kentucky by volunteering with organizations such as the Sierra Club, Kentuckians for the Commonwealth, and the Kentucky Conservation Committee. In order to build support for enhanced energy 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 petition, however, I am not presenting myself as a representative of or spokesperson for any organization.

5. I am willing to present information in a clear and concise manner, submit information requests and written comments that are directly relevant to the process of assisting the Commission staff in assessing the reasonableness of Duke's integrated

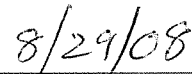
resource plan, and abide by the procedural schedule the Commission has established for the conduct of this proceeding. I would hope that Duke would find no reason to file any objections to this application for full intervention. If Duke wishes to get an idea of the kind of constructive and helpful comments I recently filed (as a non-intervenor) in an IRP case, they may find my Second Public Comment on the Joint IRP of KU and LG&E in the record of Case No. 2008-00148, submitted on August 28, 2008 (i.e., yesterday).

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


Date

CERTIFICATE OF SERVICE

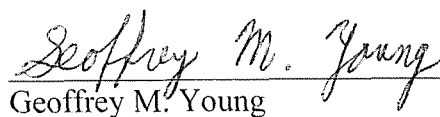
I hereby certify that an original and ten copies of the foregoing Petition to Intervene were mailed to the office of Stephanie Stumbo, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, PO Box 615, Frankfort, Kentucky 40602-0615, and that copies were mailed to the following parties on this 29th day of August, 2008.

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

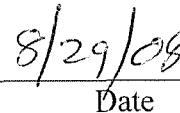
Hon. Carl Melcher
Northern Kentucky Legal Services
302 Greenup St
Covington, KY 41011

Florence Tandy
Northern Ky Community Action Commission
717 Madison Ave
Covington, KY 41011

Signed,



Geoffrey M. Young



Date