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VIA US MAIL

August 11, 2008

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AUG 12 2008

PUBLIC SERVICE
COMMISSION

Stephanie Stumbo, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2008-00251

Dear Ms. Stumbo:

Enclosed on behalf of Community Action Kentucky, Inc. and Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. are the original and eleven (11) copies of a Motion for Full Intervention in the above-referenced proceeding.

Please return a file-stamped copy to me in the enclosed envelope. If you have any questions, do not hesitate to call.

Very truly yours,



Joe F. Childers

JFC/kdc
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN) CASE NO. 2008-00251
ADJUSTMENT OF BASE RATES)

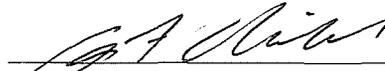
MOTION FOR FULL INTERVENTION

Pursuant to KAR 5:001 Section 3(8), Community Action Kentucky, Inc. (CAK), 101 Burch Court, Frankfort, KY 40601, and Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), P.O. Box 11610, Lexington, KY 40576, hereby move for leave to intervene as full parties in the above-referenced proceeding. In support of their Motion, CAK and CAC respectfully state as follows:

1. CAK is a Kentucky non-profit, 501(c)(3) public interest corporation that represents the Commonwealth's twenty-three (23) Community Action Agencies.¹ CAK operates the Low Income Home Energy Assistance Program (LIHEAP) in all 120 Kentucky counties and provides assistance to 150,000 low-income households in the state each year. CAK also provides technical assistance on an on-going basis to the state's four Demand-Side Management (DSM) Programs operated by American Electric Power, Louisville Gas and Electric Company, Union Light Heat and Power, and Western Kentucky Gas. These programs provide a variety of conservation services for low income households.

2. CAC is a non-profit, 501(c)(3) community action agency that provides social services to numerous low-income residents of Kentucky Utilities Company's service territory, including energy assistance and related services.
3. By intervening in this action, CAK and CAC will present facts and concerns that will not be adequately addressed or represented by any other party. CAK and CAC's full intervention will be helpful to the Commission in fully considering the parties' respective arguments, and will not unduly complicate or disrupt this proceeding.
4. CAC expects to present testimony from Jack E. Burch, Executive Director, and CAK expects to present testimony from Kip Bowmar, Executive Director. Either or both organizations may choose to present testimony from other witnesses not yet identified.
5. CAK and CAC therefore respectfully request that they be granted full intervenor status in this proceeding, including the right to present exhibits and testimony; cross-examine witnesses; submit arguments; and file briefs as allowed by the Commission.

¹ CAK was formerly known as Kentucky Association for Community Action, Inc. (KACA), but has recently changed its name. KACA has intervened in many actions before this Commission on behalf of low-income customers.


JOE F. CHILDERS

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**ATTORNEY FOR COMMUNITY
ACTION KENTUCKY, INC. AND
COMMUNITY ACTION COUNCIL
FOR LEXINGTON-FAYETTE,
BOURBON, HARRISON AND
NICHOLAS COUNTIES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the following persons by United States mail on this the 11th day of August, 2008:

Lonnie E. Bellar
Vice President – State Regulation
E.ON U.S. Services, Inc.
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