

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CONSIDERATION OF THE NEW )  
FEDERAL STANDARDS OF THE )  
ENERGY INDEPENDENCE AND )  
SECURITY ACT OF 2007 )

CASE NO. 2008-00408

**RECEIVED**

SEP 23 2009

PUBLIC SERVICE  
COMMISSION

**MOTION FOR FULL INTERVENTION**

\* \* \* \* \*

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 3(8) moves that it be granted leave to intervene in this matter and that it be granted full intervention.

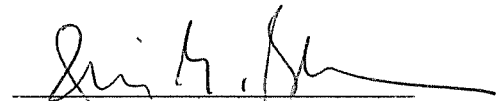
Recently, on September 15, 2009, CAC became aware that in this case the Commission will examine issues relating to Smart Grid investments and Smart Grid and Smart Meter technology. These issues will impact low-income persons, and CAC has an interest in assuring that the interests of low-income persons are considered in moving toward smart metering, smart grid, and other technologies. CAC is interested in assuring that low-income persons will equally benefit from these measures and that the costs are minimal or offset by assistance or subsidy programming. Further, CAC has an interest in assuring that technologies which affect usage conservation are appropriately coordinated with existing weatherization programs and are not subject to mechanisms that low-income persons cannot utilize. CAC urges that its voice in this discussion is necessary, and that its failure to intervene by the schedule deadline is excusable.

CAC, whose address is P.O. Box 11610, Lexington, KY 40576, is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents in the service territory of utilities that are parties to this action, including Columbia Gas of Kentucky and Kentucky Utilities Company. As such,

CAC has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. CAC's interests are not adequately represented by the other parties to this proceeding. CAC will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and this motion and participation by CAC is neither for the purpose of delay, nor will it unduly delay these proceedings, or unduly complicate or disrupt them. CAC acknowledges the procedural schedule in this case.

WHEREFORE, CAC requests that it be granted leave for full intervention and that it be certified as a full party in this proceeding.

Respectfully submitted,



IRIS G. SKIDMORE  
Bates and Skidmore  
415 W. Main St., Suite 2  
Frankfort, KY 40601  
Telephone: (502) 352-2930  
Facsimile: (502) 352-2931

COUNSEL FOR CAC

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2009, a true and accurate copy of the foregoing Motion for Full Intervention was served by United States mail, postage prepaid, to the following:

Allen Anderson  
Manager  
South Kentucky R.E.C.C.  
925-929 N. Main Street  
P. O. Box 910  
Somerset, KY 42502-0910

Lonnie E Bellar  
Vice President - State Regulation  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40202

Lonnie E Bellar  
Vice President - State Regulation  
Kentucky Utilities Company  
220 West Main Street  
P. O. Box 32010  
Louisville, KY 40202

Daniel W Brewer  
President and CEO  
Blue Grass Energy Cooperative Corp.  
P. O. Box 990  
1201 Lexington Road  
Nicholasville, KY 40340-0990

John B Brown  
Chief Financial Officer, Treasurer &  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

Anthony Campbell  
President/CEO  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

Sharon K Carson  
Finance & Accounting Manager  
Jackson Energy Cooperative  
115 Jackson Energy Lane  
McKee, KY 40447

Judy Cooper  
Manager, Regulatory Services  
Columbia Gas of Kentucky, Inc.  
2001 Mercer Road  
P. O. Box 14241  
Lexington, KY 40512-4241

Rocco D'Ascenzo  
Duke Energy Kentucky, Inc.  
P. O. Box 960  
139 East 4th Street  
Cincinnati, OH 45201

Honorable Scott H DeBroff  
Attorney at Law  
Rhoads & Sinon, LLP  
One South Market Square  
PO Box 1146  
Harrisburg, PA 17108-1146

Paul G Embs  
President & CEO  
Clark Energy Cooperative, Inc.  
P. O. Box 748  
2640 Ironworks Road  
Winchester, KY 40392-0748

Carol H Fraley  
President and CEO  
Grayson R.E.C.C.  
109 Bagby Park  
Grayson, KY 41143

Mark David Goss  
Frost, Brown, Todd, LLC  
250 West Main Street  
Suite 2700  
Lexington, KY 40507

Ted Hampton  
Manager  
Cumberland Valley Electric, Inc.  
Highway 25E, P. O. Box 440  
Gray, KY 40734

Larry Hicks  
General Manager  
Salt River Electric Cooperative Corp.  
111 West Brashear Avenue  
P. O. Box 609  
Bardstown, KY 40004

Kerry K Howard  
General Manager/CEO  
Licking Valley R.E.C.C.  
P. O. Box 605  
271 Main Street  
West Liberty, KY 41472

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

James L Jacobus  
President/CEO  
Inter-County Energy Cooperative Corp.  
1009 Hustonville Road  
P. O. Box 87  
Danville, KY 40423-0087

Honorable Tyson A Kamuf  
Attorney at Law  
Sullivan, Mountjoy, Stainback & Miller  
100 St. Ann Street  
P.O. Box 727  
Owensboro, KY 42302-0727

Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OH 45202

Mark Martin  
VP Rates & Regulatory Affairs  
Atmos Energy Corporation  
3275 Highland Pointe Drive  
Owensboro, KY 42303

Debbie Martin  
President and CEO  
Shelby Energy Cooperative, Inc.  
620 Old Finchville Road  
Shelbyville, KY 40065

Burns E Mercer  
President/CEO  
Meade County R.E.C.C.  
P. O. Box 489  
Brandenburg, KY 40108-0489

Michael L Miller  
President & CEO  
Nolin R.E.C.C.  
411 Ring Road  
Elizabethtown, KY 42701-6767

Barry L Myers  
Manager  
Taylor County R.E.C.C.  
100 West Main Street  
P. O. Box 100  
Campbellsville, KY 42719

Sanford Novick  
President and CEO  
Kenergy Corp.  
P. O. Box 18  
Henderson, KY 42419

G. Kelly Nuckols  
President & CEO  
Jackson Purchase Energy Corporation  
2900 Irvin Cobb Drive  
P. O. Box 4030  
Paducah, KY 42002-4030

Christopher S Perry  
President & CEO  
Fleming-Mason Energy Cooperative  
P. O. Box 328  
Flemingsburg, KY 41041

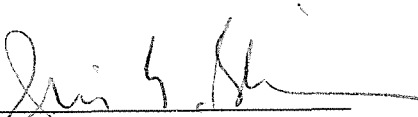
Bill Prather  
President & CEO  
Farmers R.E.C.C.  
504 South Broadway  
P. O. Box 1298  
Glasgow, KY 42141-1298

Bobby D Sexton  
President/General Manager  
Big Sandy R.E.C.C.  
504 11th Street  
Paintsville, KY 41240-1422

Mark Stallons  
President/CEO  
Owen Electric Cooperative, Inc.  
8205 Highway 127 North  
P. O. Box 400  
Owenton, KY 40359

Errol K Wagner  
Director of Regulatory Services  
American Electric Power  
101A Enterprise Drive  
P. O. Box 5190  
Frankfort, KY 40602

Albert Yockey  
VP of of Governmental Relations  
Big Rivers Electric Corporation  
201 Third Street  
Henderson, KY 42419-0024



---

Counsel for CAC