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November 14, 2008

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PUBLIC SERVICE COMMISSION

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

Re: Case No. 2008-00409
General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc.

Dear Ms. Stumbo:

Please find attached for filing with the Commission an original and twelve copies of my petition for full intervention as an individual in the above-referenced proceeding.

Sincerely,



Geoffrey M. Young

Enclosures

cc: Parties listed on the Certificate of Service

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

GENERAL ADJUSTMENT OF ELECTRIC)
RATES OF EAST KENTUCKY POWER)
COOPERATIVE, INC.)

CASE NO.
2008-00409

PETITION TO INTERVENE
OF GEOFFREY M. YOUNG

Pursuant to 807 KAR 5:001 Section 3(8)(b), 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. In addition, if KRS 278.040(2) imposes any requirements on a petitioner for full intervention, I believe this petition meets any such requirements because I have a special interest in the rates and service of East Kentucky Power Cooperative, Inc. ("EKPC") and because the Commission was acting within its authority when it initiated this proceeding and assigned it a case number on September 30, 2008.

2. I have a personal, special 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 the coal-fired power plants operated or being built by EKPC and other pollution-producing power plants that EKPC may need to build or utilize in the future. 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.

EKPC operates four coal-burning power plants in Clark County, Kentucky that emit various pollutants into the air. These units at the Dale Generating Station were built between 1954 and 1960 and have a combined capacity of 196 MW. EKPC's two coal-burning units in Pulaski County have a combined capacity of 341 MW, and its three coal-burning units in Mason County have a combined capacity of 1,459 MW. (*Kentucky's Electric Infrastructure: Present and Future*, PSC, 2005, page 15) In addition, EKPC is currently building a 278-MW (nominal) coal-burning unit at its Smith Station in Clark County, which borders on Fayette County where I live. Kentucky's weather patterns are such that on occasion, my wife and I are forced to breathe pollutants from these power plants that are potentially harmful to our health.

If EKPC were able to reduce the amount of time these plants need to operate per year because of improved end-use efficiency in their customers' homes and businesses, or if the utility were able to retire one or more of the plants sooner than expected and replace them with more sustainable supply-side and demand-side resources, the magnitude of environmental hazards arising from the utility's operations would be reduced.

3. I have a personal, special interest in the rates and service of EKPC, because the structure of the tariffs that the Commission will put into effect at the conclusion of this case will establish economic incentives and disincentives for the utility and its customers that will either encourage or discourage the implementation of energy efficiency programs and measures. If EKPC and its member cooperatives are penalized financially when their customers significantly reduce their energy consumption, they will tend not to implement demand-side management (DSM) programs that help customers save energy, or they might implement such programs on a much smaller scale than the economically optimum level. (See my prepared testimony on behalf of the Sierra Club in Case No. 2006-00472, *General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc.*, June 29, 2007 at 6-26) My interest in EKPC's rate structure is clearly an actual and legal interest, even though I am not a customer of EKPC or any of its member cooperatives.

4. I am not aware of any other environmental or energy efficiency-oriented organization or individual who intends to request full intervenor status in this case. I therefore believe that the special interests I have and the issues I plan to explore via full intervention are not otherwise adequately represented. My interests as an environmentalist and a proponent of improved energy efficiency are not the same as the statutory mandate of the Attorney General, which is consumer protection. (KRS 367.150)

5. 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, and served as the office's lead technical representative in several proceedings before the Commission relating to general rates, DSM, integrated resource planning, and tariff structures that affect the incentives of various parties to improve energy efficiency. These proceedings included:

- Case No. 2003-00433, *An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company.*
- Case No. 2003-00434, *An Adjustment of the Electric Rates, Terms and Conditions of Kentucky Utilities Company.*
- Case No. 2000-459, *The Joint Application of the Louisville Gas and Electric Company and Kentucky Utilities Company for the Review, Modification and Continuation of DSM Programs and Cost Recovery Mechanisms.*
- Case No. 2001-053, *Application of East Kentucky Power Cooperative, Inc. for a Certificate of Public Convenience and Necessity, and a Certificate of Environmental Compatibility, for the Construction of a 250 MW Coal-Fired Generating Unit (With a Circulating Fluid Bed Boiler) at the Hugh L. Spurlock Power Station and Related Transmission Facilities, Located in Mason County, Kentucky, to be Constructed Only in the Event that the Kentucky Pioneer Energy Power Purchase Agreement is Terminated.*
- Administrative Case No. 387, *A Review of the Adequacy of Kentucky's Generation Capacity and Transmission System.*

- East Kentucky Power Cooperative, Inc., Integrated Resource Planning Cases No. 2000-044 and 2003-00051.

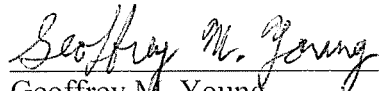
In these and other cases I believe I participated in a constructive manner that assisted the Commission in fully considering the subject matter of each case without unduly complicating or disrupting the proceedings. (Resume available on request.)

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. I was an active member of the Sierra Club's team when the organization was granted full intervenor status and participated in Case No. 2006-00472, *General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc.*, during 2007. 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. EKPC has been sending representatives to the meetings of this group since its founding. In the context of this petition, however, I am not presenting myself as a representative of or spokesperson for any organization. I am not an attorney.

6. I am willing to present information in a clear and concise manner, and submit information requests and written comments that are directly relevant to the process of assisting the Commission in assessing the reasonableness of EKPC's rates, rate structures, revenue requirements, and tariffs. I do not believe my full intervention would unduly prejudice the rights of any other party. I would hope that EKPC would find no reason to file any objections to this petition for full intervention.

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

11/14/08

Date

CERTIFICATE OF SERVICE

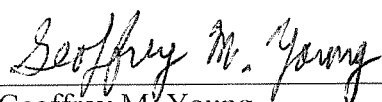
I hereby certify that an original and twelve copies of the foregoing Petition to Intervene were mailed to the office of Stephanie Stumbo, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, PO Box 615, Frankfort, Kentucky 40602-0615, and that copies were mailed to the following parties on this 14th day of November, 2008.

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

Hon. Michael L. Kurtz
Boehm Kurtz and Lowry
36 E 7th St, Suite 1510
Cincinnati, OH 45202

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

Signed,



Geoffrey M. Young

11/14/08

Date