



SEC

STAND ENERGY CORPORATION

1077 Celestial Street • Rookwood Bldg • Suite 110
Cincinnati, Ohio 45202-1629
(513) 621-1113
(800) 598-2046
(513) 621-3773 Fax

RECEIVED

JUN 09 2009

PUBLIC SERVICE
COMMISSION

June 8, 2009

VIA UPS NEXT DAY AIR SAVER

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

**Re: Case No. 2009-00141
Columbia Gas of Kentucky, Inc.
General Rate Case**

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter is an original and ten (10) copies of the Motion for Full Intervention on the part of the Stand Energy Corporation Customer Group.

Thank you for your prompt attention to this filing and you may contact me if you require any further information.

Sincerely,

John M. Dosker
General Counsel

Encls.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 09 2009

PUBLIC SERVICE
COMMISSION

In The Matter of An Adjustment)
of Gas Rates of Columbia Gas) CASE NO. 2009-00141
of Kentucky, Inc.)

**MOTION OF THE STAND ENERGY CORPORATION
CUSTOMER GROUP TO INTERVENE**

1. The Stand Energy Corporation Customer Group moves for full intervenor status pursuant to KRS 278.310 and 807 KAR 5:001 §3(8). The Stand Energy Corporation Customer Group requests that it be treated as an individual party hereto with rights to have notice of and appear at the taking of testimony, cross-examine witnesses, and be heard through the undersigned counsel as more specifically set forth herein.

2. Stand Energy Corporation ("Stand Energy") is a privately held Kentucky Corporation engaged in the marketing of natural gas to numerous end use customers in over 12 states, including the Commonwealth of Kentucky. Stand Energy Corporation's principal place of business is: 1077 Celestial Street, Suite #110, Cincinnati, OH 45202-1629. The above-named and undersigned General Counsel is licensed to practice law in Kentucky (KBA No. 82089) and is a former member of Executive Committee of the North American Energy Standards Board (NAESB), Gas Supplier Segment. Stand Energy's twenty-five (25) years of experience in more than a dozen states, including Kentucky will likely lead to the presentation of unique issues or to the development of relevant facts that may assist the Commission in the instant case.

3. Stand Energy currently serves transportation customers behind four of the six Kentucky investor-owned natural gas distribution companies as well as customers on several

large municipally-owned gas distribution systems in Kentucky. The Stand Energy Corporation Customer Group is made up of transportation gas customers in Kentucky. Stand Energy currently serves several Commonwealth of Kentucky governmental facilities and several large Public Universities in Kentucky. The identity and therefore the privacy of the individual members of The Stand Energy Corporation Customer Group should not be publicly disclosed because that information is competitively sensitive information - the disclosure of which would injure Stand Energy and disclosure could lead to intimidation or retribution against individual members of The Stand Energy Corporation Customer Group by one or more of the regulated gas utilities involved in this proceeding or a loss of privacy to one of the unregulated gas marketers involved in this proceeding. Therefore, the Stand Energy Corporation Customer Group is willing to furnish to the Commission, under confidential seal if so required, signed agency agreements authorizing Stand Energy to represent customers in this particular matter.


4. The Stand Energy Corporation Customer Group's participation in this case will not unduly complicate, disrupt or delay the proceedings. Stand Energy and its General Counsel have previously participated in gas regulatory cases before the Kentucky Public Service Commission. The Stand Energy Corporation Customer Group seeks the right to present testimony if appropriate, cross-examine witnesses, and file briefs at the appropriate time or participate in oral argument if oral argument is granted.

5. The Stand Energy Corporation Customer Group has differing commercial goals and direction relative to other parties in this case. Stand Energy is a privately held marketer and its General Counsel has absolutely no connection to any regulated utility in any state. Stand Energy has a unique blend of public and private customers in Kentucky and no other participant

can adequately represent or protect the interests of the Stand Energy Corporation Customer Group.

6. Wherefore, The Stand Energy Corporation Customer Group respectfully requests that the Commission grant it full Intervenor status pursuant to KRS 278.310 and 807 KAR 5:001 §3(8) and that it be treated as an individual party hereto with rights to have notice of and appear at the taking of testimony, cross-examine witnesses, and be heard through the undersigned counsel.

Respectfully Submitted,


JOHN M. DOSKER (KBA #82089)
GENERAL COUNSEL
Stand Energy Corporation
1077 Celestial Street, Suite #110
Cincinnati, OH 45202-1629
(Phone) (513) 621-1113
(Fax) (513) 621-3773
jdosker@stand-energy.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was hand-delivered or mailed, first class postage prepaid, this 8th day of June 2009, to the following parties of record:

Stephen B. Seiple, Esq.
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-0117

Dennis Howard, II, Esq.
Lawrence W. Cook, Esq.
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204
Assistant Attorneys General
Utility & Rate Intervention Division

Iris. G. Skidmore
415 W. Main Street, Suite 2
Frankfort, Kentucky 40601-1841

Matthew Malone, Esq.
Hurt, Crosbie & May
127 W. Main Street
Lexington, Kentucky 40507-1320

Tom Fitzgerald, Esq.
Liz D. Edmondson, Esq.
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, Kentucky 40602-1070

David F. Boehm, Esq
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202-4434
Counsel for Kentucky Industrial
Utility Customers, Inc.

W.L. Wilson, Esq.
Corporate Counsel
LFUCG Dept. of Law
200 East Main Street
Lexington, Kentucky 40507-1310


JOHN M. DOSKER