

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

Application of Louisville Gas and Electric  
Company for an Adjustment of Electric  
and Gas Base Rates

Case No. 2009-00549

**Motion for Full Intervention**

TW Telecom of Kentucky, LLC (“TWTC”) respectfully moves for full intervention in the above-referenced proceeding pursuant to KRS 278.310 and 807 KAR 5:001, § 3(8):

1. TWTC is a Competitive Local Exchange Carrier (Utility ID 5056040) and a long distance carrier (Utility ID 5177200) in the Commonwealth of Kentucky. It attaches its facilities to poles of the Applicant, Louisville Gas and Electric Company, and accordingly is affected by that part of the rate-adjustment application that seeks to increase the Applicant’s pole attachment rates and to maintain any distinction in pole-attachment rates disfavoring those classified as telecommunications carriers.

2. Although cable systems that attach their facilities to the Applicants have been granted intervention in this proceeding through their association (KCTA), it appears that no entity classified as a telecommunications carrier has intervened or is otherwise a party to this proceeding. Intervention by TWTC thus is likely to present issues and develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

3. TWTC accepts the existing procedural schedule, established in this proceeding by Order entered February 16, 2010. If TWTC files any documents in the course of this proceeding, it will serve a copy on all other parties then of record (as it has done with this Motion). If

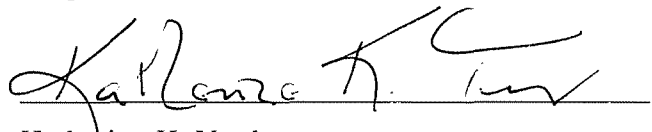
granted the requested intervention, TWTC asks that Commission Orders and filings made or document submitted by parties be served on:

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TW TELECOM OF KENTUCKY, LLC  
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Katherine K. Yunker  
YUNKER & PARK PLC  
P.O. Box 21784  
Lexington, KY 40522-1784

WHEREFORE, TWTC respectfully requests full intervention in this proceeding.

Respectfully submitted,




Katherine K. Yunker  
YUNKER & PARK PLC  
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Lexington, KY 40522-1784  
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ATTORNEY FOR TW TELECOM OF  
KENTUCKY, LLC

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this the 15th day of March 2010, the original and ten (10) copies of the foregoing were sent via U.S. Mail, first-class and postage prepaid, to the Commission for filing, and a copy was served, by the same means, on each person at the address shown on the attached Service List.



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