

APR 27 2010

**PUBLIC SERVICE
COMMISSION****COMMONWEALTH OF KENTUCKY****BEFORE THE PUBLIC SERVICE COMMISSION****In The Matter of:**

AN INVESTIGATION OF NATURAL GAS)
RETAIL COMPETITION PROGRAMS) **CASE NO. 2010-00146**

**MOTION OF STAND ENERGY CORPORATION
FOR FULL INTERVENTION**

Stand Energy Corporation ("Stand Energy"), pursuant to the Order of the Kentucky Public Service Commission entered April 19, 2010, hereby moves for full intervenor status in the above-captioned proceeding pursuant to KRS 278.310 and 807 KAR 5:001 §3(8).

Stand Energy has differing commercial goals than Kentucky's regulated natural gas utilities, the Kentucky Attorney General, or any other party or prospective party in the above-captioned case and therefore no other participant can adequately represent or protect the interests of Stand Energy. Stand Energy's participation will lead to the presentation of relevant facts and issues that will assist the Kentucky Public Service Commission in the investigation of natural gas retail competition programs without unduly complicating, disrupting or delaying the proceedings. In support of the foregoing motion, Stand Energy states as follows:

1. Stand Energy is a private gas marketer and a Kentucky corporation, with offices located at 1077 Celestial Street, Rookwood Building 3, Suite 110, Cincinnati, Ohio 45202-1629.
2. Stand Energy is engaged in the marketing of natural gas to a unique blend of public and private customers in over 14 states (including Kentucky), with experience delivering natural gas behind more than 30 local distribution companies (including, but not limited to Columbia Gas of Kentucky, Duke Energy Kentucky, Delta Natural Gas, Louisville Gas and

Electric). Stand Energy has absolutely no connection to any regulated utility in any state. Stand Energy has experience with the retail natural gas programs of other states.

3. Stand Energy supplies natural gas to large Commonwealth of Kentucky government facilities and numerous private industrial companies via the traditional large volume gas transportation programs of Columbia Gas of Kentucky, Duke Energy Kentucky, Louisville Gas and Electric and Delta Natural Gas.

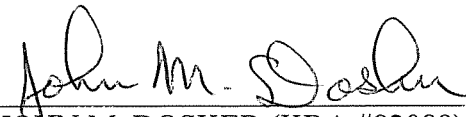
4. Stand Energy supplies natural gas under the Columbia Gas of Kentucky Choice Program to smaller Commonwealth of Kentucky government facilities and other entities that qualify to participate under the contract.

5. The undersigned General Counsel of Stand Energy is licensed to practice law in Kentucky as well as the United States Supreme Court and is a former member of the Executive Committee of the North American Energy Standards Board (NAESB), Gas Supplier Segment. Stand Energy has over twenty-five (25) years of experience in marketing natural gas and active participation in regulatory proceedings involving natural gas.

6. Stand Energy clearly has unique experience that is not possessed by any other party in these proceedings.

7. WHEREFORE, Stand Energy Corporation respectfully requests that the Kentucky Public Service Commission grant Stand Energy full Intervenor status.

Respectfully Submitted,


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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was hand-delivered or mailed, first class postage prepaid, this 27th day of April 2010, to the following parties of record:

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