

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAY 28 2010

PUBLIC SERVICE
COMMISSION

In the Matter of:

An Investigation of Natural Gas Retail
Competition Programs

Case No. 2010-00146

MOTION OF PROLIANCE ENERGY, LLC

FOR FULL INTERVENTION

ProLiance Energy, LLC (“ProLiance”), 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 807 KAR 5:001 §3(8).

ProLiance, as a marketer currently supplying customers in Kentucky, has a special interest in the above-captioned case. It may have differing goals and interests than other marketers, Kentucky local distribution companies, 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 ProLiance. ProLiance’s participation will assist the Kentucky Public Service Commission in the investigation of natural gas retail competition programs without unduly complicating or disrupting the proceedings. In support of the foregoing motion, ProLiance states as follows:

1. ProLiance is an Indiana limited liability company headquartered in Indianapolis, Indiana. ProLiance’s address is 111 Monument Circle, Suite 2200, Indianapolis, Indiana, 46204. ProLiance is authorized to do business in Kentucky.

2. ProLiance is a natural gas marketer serving customers primarily in the Midwest, including the states of Indiana, Kentucky, Ohio, Illinois, and Michigan.

3. ProLiance currently supplies large commercial customers behind Louisville Gas and Electric, Columbia Gas of Kentucky, Duke Energy Kentucky, and Atmos Energy Kentucky.

4. ProLiance has experience with other state retail natural gas programs.

5. ProLiance serves a unique segment of the Kentucky natural gas market and therefore has interests that may not be adequately represented by other parties to this proceeding.

6. If the Commission grants the requested intervention, ProLiance asks that Orders of the Commission and filings made or documents submitted by parties be served on:

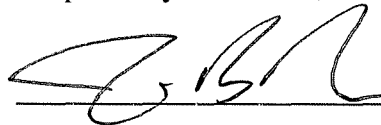
Michael T. Griffiths
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Indianapolis, IN 46204

Katherine K. Yunker
John B. Park
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Please note that Mr. Griffiths has made application to the Kentucky Bar Association for an Out-of-State Certification Form, and that ProLiance will move for his admission to practice before the Commission *pro hac vice* in this matter upon issuance of the Certificate.

WHEREFORE, ProLiance Energy, LLC requests that the Kentucky Public Service Commission grant ProLiance full intervenor status.

Respectfully submitted,

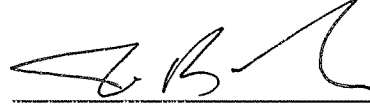


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ATTORNEYS FOR PROLIANCE ENERGY, LLC

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this the 28th day of May 2010, the original and ten (10) copies of the foregoing were hand-delivered to the Commission for filing, and that a copy was served via U.S. Mail, first class and postage prepaid, on each person at the address shown on the attached Service List.

A handwritten signature in black ink, appearing to be 'Z. B. L.', written over a horizontal line.

Attorney for ProLiance Energy, LLC

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