

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY AND KENTUCKY UTILITIES ) CASE NO.  
COMPANY FOR THE REVIEW, MODIFICATION, ) 2014-00003  
AND CONTINUATION OF EXISTING, AND ADDITION)  
OF NEW, DEMAND SIDE MANAGEMENT AND )  
ENERGY EFFICIENCY PROGRAMS )

**MOTION TO INTERVENE**

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Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 4(11) moves that it be granted leave to intervene in this matter.

In this matter the Commission will examine the request of Louisville Gas and Electric Company and Kentucky Utilities Company for a review, modification, and continuation of existing demand side management (DSM) and energy efficiency programs and addition of new programs. Continuation of and modification to existing demand side management programs and energy efficiency programs that may result from this application may impact the low-income population served by CAC. CAC has an interest in ensuring that customers with low-incomes receive a fair return on their contributions to the DSM charges, and that these low-income customers benefit from the programs.

CAC, whose address is P.O. Box 11610, Lexington, KY 40576, is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents in Kentucky Utilities Company's (KU) service territory. CAC has partnered with KU in programs to assist its low income customers, beginning with the WinterCare Energy Fund, which was established in 1983. CAC has provided

administrative services, financial management and marketing support for the Fund since its inception. CAC also implemented and administers the Kentucky Utilities Home Energy Assistance (HEA) Program, which serves KU customers by providing monthly subsidies throughout the winter and summer peak usage months. CAC has a significant interest in the WeCare DSM program because CAC fully operates this program within its service area. Under a contract with KU, CAC provides intakes and audits for WeCare, and coordinates with CAC contractors for installation of necessary measures. CAC's expertise in these DSM programs will offer a unique perspective and assist the Commission in the review of this application.

In addition, CAC has frequently intervened in KU rate and DSM cases before the Commission. In those cases, CAC has advocated for lower rates and programs that provide assistance for low-income customers and which encourage energy efficiency and conservation.

Because CAC is the primary advocate for low income customers in KU's service area, it has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. CAC's interests are not adequately represented by the other parties to this proceeding. CAC will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

CAC may present the testimony of Charles D. Lanter, and may choose to present testimony of other witnesses not yet identified.

WHEREFORE, CAC requests that it be granted leave to intervene and that it be certified as a full party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross-examine witnesses, and be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties or orders of the Commission.

Respectfully submitted,



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COUNSEL FOR CAC

**CERTIFICATE OF SERVICE**

I hereby certify that CAC's January 21, 2014 electronic filing is a true and accurate copy of the Motion to Intervene to be filed in paper medium; and that on January 21, 2014, the electronic filing has been transmitted to the Commission, and that an original and one copy of the filing will be delivered to the Commission, that no participants have been excused from electronic filing at this time, and electronic mail notification of the electronic filing is provided to the following:

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