

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 REVIEW, MODIFICATION, AND)	2014-00003
CONTINUATION OF EXISTING, AND ADDITION)	
OF NEW, DEMAND-SIDE MANAGEMENT AND)	
ENERGY-EFFICIENCY PROGRAMS)	

MOTION TO INTERVENE
OF ASSOCIATION OF COMMUNITY MINISTRIES, INC.

Now comes Association of Community Ministries, Inc. (“ACM”), by and through counsel, and pursuant to 807 KAR 5:001, Section 4(11) moves for leave to intervene in this proceeding.

ACM is an umbrella organization comprised of the fourteen independent community ministries that provide social services to low-income individuals throughout Louisville Metro, with each ministry serving a designated geographic area. All of ACM’s fourteen members provide emergency financial assistance, including assistance to households in danger of losing utility service from Louisville Gas and Electric Company (“LG&E”) because they are unable to pay their energy bills. ACM member agencies also advocate for low-income customers threatened with disconnection of utility service and implement the Winterhelp program. ACM, whose address is P.O. Box 99545, Louisville, Kentucky 40269, is a Kentucky nonprofit 501(c)(3) corporation.

ACM has an interest in this proceeding as an assistance provider and advocate for low income utility customers in the LG&E service territory, who are and will continue to

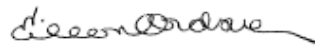
be uniquely affected by the demand side management and energy efficiency programs under consideration herein. For example, the monthly bill impact of LG&E's DSM/EE programs have a larger relative impact on low-income customers than on others; at the same time low-income customers are unable to take advantage of the energy conservation opportunities their dollars fund to the same extent as are other customers. ACM and the LG&E customers its member agencies serve also have a unique interest in the operation of the WeCare program, which the instant application proposes to continue without modification.

Through its participation in this case, ACM will assist the Commission in developing these issues and evaluating how the demand-side management and energy-efficiency programs set forth in the application for review, modification, continuation and/or addition impact low income customers in the LG&E service territory. ACM has participated in a number of other matters before the Commission, including *Joint Application of Louisville Gas & Electric Co., Association of Community Ministries, Inc., People Organized and Working for Energy Reform and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program*, Case No. 2007-00337; *Application of Louisville Gas and Electric Company, Inc. for an Adjustment of its Electric and Gas Base Rates*, Case No. 2008-00252; *Application of Louisville Gas and Electric Company for an Adjustment of Electric and Gas Base Rates*, Case No. 2009-00549; *An Investigation of Natural Gas Retail Competition Programs*, Case No. 2010-00146; *Joint Application of PPL Corporation, E.On Ag, E.On Us Investments Corp., E.On U.S. LLC, Louisville Gas and Electric Company, and Kentucky Utilities Company for Approval of an Acquisition of Ownership and Control of Utilities*,

Case No. 2010-00204; *Joint Application of Louisville Gas & Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Existing, and Addition of New, Demand-Side Management and Energy-Efficiency Programs*, Case No. 2011-00134; and *Application Of Louisville Gas and Electric Company for Adjustment of its Electric and Gas Rates, A Certificate Of Convenience and Necessity, Approval of Gas Service Lines and Risers, and a Gas Line Surcharge*, Case No. 2012-00222. It represents an interest that is not otherwise adequately represented by parties to this proceeding. If allowed to intervene, ACM will present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, ACM requests that it be granted leave to intervene as a full party in this proceeding, with all rights attendant to full party status.

Respectfully submitted,



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Counsel for ACM

Dated: January 28, 2014

CERTIFICATE OF COMPLIANCE AND SERVICE

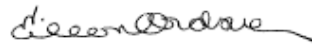
In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s January 28, 2014 electronic filing of the foregoing Motion To Intervene is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on January 28, 2014; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and one copy in paper medium are being mailed to the Commission on January 28, 2014.

I further certify that in accordance with 807 KAR 5:001, Section 4(8), the foregoing Motion To Intervene is being contemporaneously provided via electronic mail to:

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