

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In The Matter Of:**

<b>APPLICATION OF LOUISVILLE GAS AND</b>	)	
<b>ELECTRIC COMPANY FOR AN ADJUSTMENT</b>	)	<b>CASE NO.</b>
<b>OF ITS ELECTRIC AND GAS RATES</b>	)	<b>2014-00372</b>

**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.

The attorneys for ACM authorized to represent it in this proceeding and to take service of all documents are:

Lisa Kilkelly  
Eileen Ordover  
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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 will be uniquely affected by any rate increase. For example, the monthly bill impact of any rate adjustment will have a larger relative impact on low-income customers than on others. Further, year-round, ACM member agencies provide direct service to low-income LG&E customers who cannot pay their utility bills and face disconnections. ACM member agencies do not have sufficient financial resources to assist all those in need and they are gravely concerned that increased rates will lead to more low-income LG&E customers facing shut offs and going without vital gas and electric service.

Through its participation in this case, ACM will assist the Commission in developing these issues and evaluating how the proposed rate adjustments would impact low-income customers in the LG&E service territory. ACM has participated in a number of other matters before the Commission.<sup>1</sup> It represents a special interest that is not

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<sup>1</sup> *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; *Application Of Louisville*

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: November 24, 2014

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*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; and Joint Application of Louisville Gas and 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. 2014-00003.*

**CERTIFICATE OF COMPLIANCE AND SERVICE**

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s November 24, 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 submitted to the Commission on November 24, 2014; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy in paper medium is being mailed to the Commission on November 24, 2014 by Express Mail.

*Lisa Kilkelly*

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Counsel for ACM