

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR AN ADJUSTMENT OF ITS) CASE NO: 2016-00370
ELECTRIC RATES AND FOR CERTIFICATES)
OF PUBLIC CONVENIENCE AND NECESSITY)

**COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON,
HARRISON, AND NICHOLAS COUNTIES, INC.'S MOTION TO INTERVENE**

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

In this matter the Commission will examine the request of Kentucky Utilities Company (hereinafter “KU”) for an adjustment of its electric rates and for certificates of public convenience and necessity. Any increase in electric bills that may result from this application will adversely impact the low-income population served by CAC in all of its counties.

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 many low income residents in KU’s service territory. CAC has partnered with KU in programs to assist its low income customers, including the WinterCare Energy Fund, KU’s Home Energy Assistance (HEA) Program, and KU’s WeCare.

In addition, CAC has frequently intervened in KU rate and demand-side management 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 expects to present the testimony of Malcolm J. Ratchford, Executive Director of CAC, and may choose to present testimony of other witnesses not yet identified.

WHEREFORE, CAC requests that it be granted leave for full intervention 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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CERTIFICATE OF SERVICE

I hereby certify that CAC's November 16, 2016 electronic filing is a true and accurate copy of CAC's Motion to Intervene and Read 1st document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on November 16, 2016; that an original and six copies of the filing will be delivered to the Commission on November 16, 2016; that there are currently no parties excused from participation by electronic service; and that, on November 16, 2016, electronic mail notification of the electronic filing is provided to the following:

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