COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

ELECTRONIC APPLICATION OF LOUISVILLE )
GAS AND ELECTRIC COMPANY FOR AN ) CASE NO.
ADJUSTMENT OF ITS ELECTRIC AND GAS ) 2016-00371
RATES AND FOR CERTIFICATES OF PUBLIC )
CONVENIENCE AND NECESSITY )

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  
LEGAL AID SOCIETY, INC.  
416 W. Muhammad Ali Blvd., Ste. 300  
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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.  

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. Consistent with its participation in past proceedings, ACM will do so efficiently and 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 22, 2016
CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.’s November 22, 2016 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 22, 2016; 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 22, 2016 by Express Mail.

___________________________________
Lisa Kilkelly
Counsel for ACM