

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

In the matter of: : CASE NO. 2018-00295

THE ELECTRONIC APPLICATION OF LOUISVILLE :
GAS & ELECTRIC COMPANY FOR AN :
ADJUSTMENT OF ITS ELECTRIC AND GAS RATES :
:

KENTUCKY SCHOOL BOARDS ASSOCIATION’S MOTION TO INTERVENE

Comes the Kentucky School Boards Association (“KSBA”), 260 Democrat Drive, Frankfort, Kentucky 40601 pursuant to 807 KAR 5:001 Section 4(11), by counsel, and moves that it be granted leave to intervene in this matter and that it be granted full intervention. In support of this Motion, KSBA states as follows:

KSBA is a nonprofit corporation of school boards from each public-school district in Kentucky. KSBA serves school board members and school districts in such areas including but not limited to energy policy. KSBA is governed by a 27-member board of directors made up of representatives elected as regional chairpersons or as directors-at-large. With nearly 900 school board members, KSBA is the largest organization of elected officials in Kentucky.

KSBA has involvement with energy initiatives with its representative school boards and electric service and other energy costs represent a significant cost of representative school district budgets. KSBA has intervened in prior LG&E rate adjustment matters as well namely Case No. 2016-00371, Case No. 2014-00372, Case No. 2012-00222, Case No. 2010-00204 and Case No. 2009-00549 – actively participating in all cases.

In this matter the Commission is in the process of examining the request of Louisville Gas and Electric Company for a general adjustment in electric and gas base rates, significant changes in its pricing structure and other matters including elimination of the School Power

Service (SPS) and School Time-of-Day (STOD) pilot rates instituted in Case No. 2016-00371. Conversely, in this matter KSBA has an interest in the possible continuation of rates SPS and STOD in addition to general budgetary concerns for its members. And, currently based on the Commission's entered Order on October 11, 2018 herein, rate schedules SPS and STOD continue in effect until the conclusion of the investigations in LG&E/KU's respective rate applications.¹ Approval of this application would have a significant impact on KSBA's school board districts and their budgets. KSBA represents all of the public-school boards within Louisville Gas and Electric Company's service territory. KSBA has also addressed this rate filing with the Kentucky Non-Public School Commission (KyNPSC) and will represent the interests of their member schools as well. As such, KSBA has a special interest in this proceeding and KSBA's interests are not adequately represented by the other parties to this proceeding including that of the Attorney General. KSBA intends, at a minimum, to present the testimony of Mr. Ronald Willhite who has extensive utility experience having worked previously in various rate-making capacities for Kentucky Utilities and Louisville Gas and Electric for over 30 years. KSBA will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by KSBA will not unduly delay these proceedings, or unduly complicate or disrupt them along with this motion being timely.

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

Matthew R. Malone, Esq.
William H. May, III. Esq.
Hurt, Deckard & May PLLC
127 West Main Street
Lexington, Kentucky 40507

¹ See Case No. 2017-00441, *Electronic Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification and Continuation of Certain Existing Demand -Side Management and Energy Efficiency Programs*, p. 2 of Order, dated October 25, 2018.

(859) 254-0000 (office)
(859) 254-4763 (facsimile)
mmalone@hdmfirm.com
bmay@hdmfirm.com

Wherefore, KSBA respectfully requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

/s/Matt Malone

Matthew R. Malone
William H. May, III.
Hurt, Deckard & May PLLC
127 West Main Street
Lexington, Kentucky 40507
(859) 254-0000 (office)
(859) 254-4763 (facsimile)
mmalone@hdmfirm.com
bmay@hdmfirm.com

Counsel for the Petitioner,
KENTUCKY SCHOOL BOARDS ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that KSBA's October 29, 2018 electronic filing is a true and accurate copy of KSBA's pleading and Read 1st Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on October 29, 2018; that an original and one copy of the filing will be delivered to the Commission on October 29, 2018; that there are currently no parties excused from participation by electronic service; and that, on October 29, 2018, electronic mail notification of the electronic filing is provided to the following:

Hon. Robert C. Moore
Stites & Harbison, PLLC
421 W. Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
rmoore@stites.com

Hon. Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202
MKurtz@bkllawfirm.com

Rebecca W. Goodman, Esq.
Lawrence W. Cook, Esq.
Kent Chandler, Esq.
Assistant Attorney General
Office of the Attorney General
Utility and Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204
Rebecca.Goodman@ky.gov
Larry.Cook@ky.gov
Kent.Chandler@ky.gov

Hon. Kendrick Riggs
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202-2828
Kendrick.riggs@skofirm.com

Hon. Allyson K. Sturgeon
Senior Corporate Attorney
LG&E Energy Corp.
220 W. Main Street
Louisville, KY 40202
Allyson.Sturgeon@lge-ku.com

Lindsey W. Ingram, III, Esq.
Stoll Keenon Ogden, PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
l.ingram@skofirm.com

Hon. Don Parker
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WV 25301
dparker@spilmanlaw.com

/s/Matt Malone

ATTORNEY FOR KSBA