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PUBLIC SERVICE COMMISSION

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FILE NO: 11303/10

Original Will Be Sent By Mail

DATE: 12/15/2008 3:52:47 PM PAGES (INCLUDING COVER PAGE): 10

CLIENT-MATTER: 11303-10

TO: Jennifer Yount

FIRM: Kentucky Public Service Commission

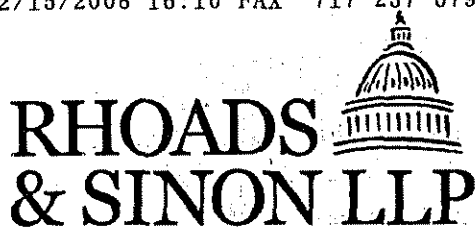
FAX: 502-564-3460 Main No.: 502-564-3940

FROM: Scott H. DeBroff, Esquire E-MAIL: SDeBroff@Rhoads-Sinon.com

Comments:

Attached please find the Petition to Intervene of Trilliant Inc. for Case 2008-00408 and the Kentucky Bar Association Out of State Certification Request Form

SHD/msi



Scott H. DeBroff, Esquire

Phone: (717) 237-6716

Fax: (717) 237-6790

SDeBroff@Rhoads-Sinon.com

FILE NO: 11303/10

December 15, 2008

Via Facsimile

Kentucky Bar Association
 Attn: Membership Department
 514 W Main St
 Frankfort, KY 40601-1812

Re: Kentucky Bar Association Out of State Certification Request Form

To Whom It May Concern:

Enclosed please find the Out of State Certification Request Form for Scott H. DeBroff. Due to the nature of the deadline in the Kentucky case that we would like to intervene in, we will fax the Request form today, and follow up with the original hard copy by FedEx. Please fax us the receipt at (717) 237-6790.

If you have any questions please feel free to contact us at (717) 233-5731.

Sincerely,

RHOADS & SINON LLP

By: 
 Scott H. DeBroff, Esquire

Enclosure

SHD/msi



KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION REQUEST FORM



PLEASE PROVIDE THIS OFFICE WITH THE FOLLOWING INFORMATION:

NAME: Scott H. DeBroff
(PLEASE PRINT)

DATE OF BIRTH: 3/2/63

ADDRESS TO BE USED FOR KBA RECORDS:
Rhoads + Simon LLP
One South Market Square, PO Box 1146
Harrisburg, PA 17108-1146

TELEPHONE NUMBER: (Please indicate if this is a business or home telephone number)
717-233-5731 / 717-237-6716 (direct line)
 Home
 Business

FAX NUMBER: 717-237-6790

E-MAIL ADDRESS: sdebrotto@rhoads-simon.com

STATE BARS OF WHICH YOU ARE A MEMBER IN GOOD STANDING: (Please include membership number)
PA - 61170

KY COURT AND CASE NUMBER FOR WHICH YOU SEEK CERTIFICATION:
Commonwealth of Kentucky Public Service Commission - 2008-00408
(REQUIRED)

KENTUCKY CO-COUNSEL / BAR #: David G. Richardson, 85635
(REQUIRED)

Since January 1, 2005, have you practiced a case in Kentucky under SCR 3.030? YES NO

SCR 3.030 Membership, practice by nonmembers and classes of membership

(2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$100.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee.

- I have read and agree to comply with the requirements set forth in SCR 3.030(2), including submitting to the Rules of Professional Conduct of The Kentucky Supreme Court.
- I certify by signing this form that I am a member in good standing in my state(s) of licensure, and that the information provided by me on this form is true and correct.

Notary Seal:
(Required)

Scott H. DeBroff
SIGNATURE

Commonwealth of PENNSYLVANIA
STATE OF _____ COUNTY OF DAUPHIN

Acknowledged, subscribed & sworn to by Scott H. DeBroff
(Attorney's Name)
who personally appeared before me on the 15th day of December, 2008.

Shelley A. Derfler
NOTARY PUBLIC
My Commission expires: _____

RETURN ORIGINAL FORM TO:
KENTUCKY BAR ASSOCIATION
ATTN: MEMBERSHIP DEPARTMENT
514 W MAIN ST
FRANKFORT KY 40601-1812
Phone (502)564-3795

Revised 01/08/08

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Shelley A. Derfler, Notary Public
City Of Harrisburg, Dauphin County

**RHOADS
& SINON LLP**



Scott H. DeBroff, Esquire

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Fax: (717) 237-6790

SDeBroff@Rhoads-Sinon.com

FILE NO: 11303/10

December 15, 2008

Via Facsimile

Ms. Stephanie Stumbo
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

**Re: Case No. 2008-00408 Consideration of the New Federal Standards of the
Energy Independence and Security Act of 2007**

Dear Ms. Stumbo:

Please find enclosed the original and ten (10) copies of the Petition to Intervene of Trilliant Inc. in the above referenced matter. Please enter this into the docket and time-stamp the additional two (2) copies and return to us in the enclosed self addressed stamped envelope.

If you have any questions regarding this filing, please do not hesitate to call us at (717) 233-5731.

Best regards,

RHOADS & SINON LLP

By: 
Scott H. DeBroff, Esquire

Enclosure

SHD/msi

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

**CONSIDERATION OF THE NEW
FEDERAL STANDARDS OF THE
ENERGY INDEPENDENCE AND
SECURITY ACT OF 2007**

Docket No. 2008-00408

PETITION TO INTERVENE ON BEHALF OF TRILLIANT INC.

**SCOTT H. DEBROFF, ESQUIRE
ALICIA R. PETERSEN, ESQUIRE
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
P.O. BOX 1146
HARRISBURG, PA 17108-1146**

TEL: (717) 233-5731
FAX: (717) 231-6626
EMAIL: SDEBROFF@RHOADS-SINON.COM
APETERSEN@RHOADS-SINON.COM

DATED: DECEMBER 15, 2008

COUNSEL FOR TRILLIANT INC.

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

**CONSIDERATION OF THE NEW
FEDERAL STANDARDS OF THE
ENERGY INDEPENDENCE AND
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AND NOW COMES, **Trilliant Inc.** ("Trilliant"), by and through its counsel, **Scott H. DeBross, Esquire** and **Alicia R. Petersen, Esquire** of Rhoads & Sinon LLP for the purpose of filing this "Petition For Full Intervention" with respect to the proceeding of the Kentucky Public Service Commission ("KPSC" or the "Commission") to permit the Commission to consider the new federal standards of the Energy Independence and Security Act of 2007 regarding integrated resource planning, rate design modification to promote energy efficiency investments, consideration of Smart Grid investments, Smart Grid information and the use and prevention of industrial waste energy. On their behalf, we aver the following:

1. Trilliant, with its corporate headquarters in Redwood City, California, is primarily focused on advanced metering infrastructure (AMI) solutions, which enable utilities to develop time-of-use (TOU) metering and demand response programs. These programs are transforming the traditional customer-utility relationship through interval based consumption data and 2-way messaging.

2. Trilliant is a party interested in the above-captioned docket as it provides open standards-based network solutions to utilities for advanced metering infrastructure (AMI), demand response, and grid management. Its solutions enable utilities to better serve their customers, develop new revenue sources, and reduce overall expenses.

3. Trilliant has been involved extensively in related proceedings, like the EPACT 2005 proceedings across the country and before other state public utility commissions. Our interest in intervening in this proceeding is to inform and educate the Commission on the issues of Smart Grid Investments and Smart Grid information and their value to both utilities and customers.

4. Trilliant has a substantial and bona fide interest in the subject matter of this docket and its interests cannot be represented or protected adequately by other existing parties to this docket.

5. Trilliant intends to play a constructive role in the Commission's decision-making process herein and their participation will not unduly prejudice any party.

6. Trilliant respectfully requests that its "Petition for Full Intervention" be granted and that it be given full party status in this case and placed on the Commission's Official Service List for this docket.

7. Trilliant's attorneys and to whom all correspondence and pleadings in this docket should be directed to are:

SCOTT H. DEBROFF, ESQUIRE
RHOADS & SINON LLP
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MR. TRENT BOWERS
TRILLIANT INC.
SENIOR VP - TECHNOLOGY &
SOLUTIONS ADOPTION
5625 COPPER CREEK PASS
CUMMING, GA 30040

TEL: (678) 513-3235
EMAIL:
TRENT.BOWERS@TRILLIANTINC.COM

WHEREFORE, Trilliant Inc. respectfully requests that the Kentucky Public Service Commission grant it Full Intervenor Status in the above captioned investigation. We look forward to participating in the process going forward and contributing our experience and expertise.

Respectfully submitted,

By: 

SCOTT H. DEBROFF, ESQUIRE
ALICIA R. PETERSEN, ESQUIRE
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DATED: DECEMBER 15, 2008

COUNSEL FOR TRILLIANT INC.

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

**CONSIDERATION OF THE NEW
FEDERAL STANDARDS OF THE
ENERGY INDEPENDENCE AND
SECURITY ACT OF 2007**

Docket No. 2008-00408

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "PETITION TO INTERVENE ON BEHALF OF TRILLIANT INC." by facsimile to Stephanie Stumbo, Executive Director, Public Service Commission and followed up with an original and ten photocopies of this Motion to Intervene the next day by FedEx to the Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601:

Dated: December 15, 2008

By: 

**SCOTT H. DEBROFF, ESQUIRE
ALICIA R. PETERSEN, ESQUIRE
RHOADS & SINON LLP
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COUNSEL FOR TRILLIANT INC.