

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

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MAY 12 2010

PUBLIC SERVICE  
COMMISSION

In the Matter of:

**MOTION TO INTERVENE BY  
MEMBER-CUSTOMER OF SHELBY  
ENERGY COOPERATIVE, INC. IN  
ONGOING RATE CASE**

**CASE NO.  
2009-00410**

Comes the undersigned Member-Customer of Shelby Energy Cooperative, Inc. and request leave to intervene in the above-styled matter per 807 KAR 5:001. The Member-Customer requests that she be made a party to the ongoing action in whatever capacity the Commission may deem appropriate. The interests of the Members-Customer are as follows:

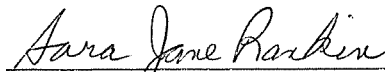
1. In The Third Data Request of Commission Staff to Shelby Energy Cooperative, Inc.(April 5<sup>th</sup>, 2010), this Commission asked in question 7 (d) the amount of bonuses paid in 2009.
2. In the Response, Witness Jim Adkins replied, “Due to economic conditions, no performance bonus was paid by Shelby Energy in 2009.” Response to Commissions Staff’s Third Date Request, Item No. 7, Page 5 of 7.
3. At a recent Board Meeting however, CEO Debbie Martin admitted that there were “gifts” distributed to certain staff members. To whom, based on what criteria, and the amounts are unknown to the Member-Customers.
4. Further issues (after all discovery seems to be complete) in this Request to Adjust Rates, include the following items all of which directly relate to rates:

- a. Legal fees paid by the Cooperative (including the ongoing Shelby Circuit Case of whistle-blower and former cooperative employee, Bruce Stansbury)
- b. Remodeling and refurbishing of the offices
- c. Use of contractors related to Shelby Energy Employees
- d. The creation of two new Vice-President positions within the Shelby Energy Cooperative

This request for leave to intervene comes only after the three Requests for Data have been responded to: the undersigned have carefully reviewed these documents and have found them to be incomplete, disingenuous, and lacking in full disclosure.

For those reasons, the following Member-Customer requests that this Commission allow her to intervene, as their interests are not being adequately represented. Further the Members-Customer, if allowed to intervene, will present issues and develop facts to assist this Commission without undue complication or disruption.

Respectfully requested by:



Sara Jane Rankin of 6778 Waddy Road, Waddy Kentucky 40076

Phone: (502) 829-9199

### **CERTIFICATE OF SERVICE**

I do hereby certify that an exact copy of the foregoing was sent first-class mail via the United States Postal Service to the following individuals on May 10<sup>th</sup>, 2010.

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

Don Prather, Attorney for Shelby Energy Cooperative, Inc.  
P.O. Box 1059  
Shelbyville, Kentucky 40066

Jack Conway, Attorney General of Kentucky  
Office of Rate Intervention  
1024 Capital Center Drive  
Suite 200  
Frankfort, Kentucky 40601

  
Sara Jane Rankin  
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