

# BATES & SKIDMORE

ATTORNEYS AT LAW  
415 W. MAIN STREET, SUITE 2  
FRANKFORT, KENTUCKY 40601  
PH: 502-352-2930  
FAX: 502-352-2931  
[BatesAndSkidmore@gmail.com](mailto:BatesAndSkidmore@gmail.com)

JACK B. BATES

IRIS G. SKIDMORE

**Via Hand-Delivery**

January 27, 2010

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

RECEIVED

JAN 27 2010


PUBLIC SERVICE  
COMMISSION

**Re:** Application of Kentucky Utilities Company for an Adjustment in Rates  
Case No. 2009-00548

Dear Mr. Derouen:

Enclosed for filing in the above styled action is an original and ten copies of the Motion for Full Intervention on behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.

Sincerely,



Iris G. Skidmore

Enclosure

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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JAN 27 2010

PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES )  
COMPANY FOR A GENERAL ADJUSTMENT ) CASE NO: 2009-00548  
IN BASE RATES )

**MOTION FOR FULL INTERVENTION**

\* \* \* \* \*

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 3(8) 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 for a general adjustment in electric base rates. Approval of this application would have a significant impact on CAC's low income clients.

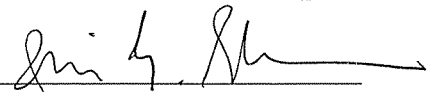
CAC, whose address is P.O. Box 11610, Lexington, KY 40576, is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents in Kentucky Utilities Company's service territory. As such, CAC has a special 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 Jack E. Burch, 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,



IRIS G. SKIDMORE  
415 W. Main St., Suite 2  
Frankfort, KY 40601  
Telephone: (502)-352-2930  
Facsimile: (502)-352-2931

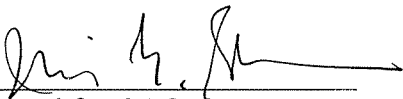
COUNSEL FOR CAC

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2010, a true and accurate copy of the foregoing Motion for Full Intervention was served by United States mail, postage prepaid, to the following:

Lonnie E. Bellar  
E.ON U.S. LLC  
220 West Main Street  
Louisville, KY 40202

Hon. Michael L. Kurtz  
Boehm, Kurtz, and Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, Ohio 45202



Counsel for CAC