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APR 21 2010

PUBLIC SERVICE  
COMMISSION

April 20, 2010

KENTUCKY PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
P.O. Box 615, 211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

Re: Case No. 2009-00548

Application of Kentucky Utilities Company for an Adjustment of Rates

Dear Mr. Derouen:

Please find enclosed for filing with the Commission an original and ten copies of my petition for full intervention as an individual environmentalist in the above-referenced proceedings.

Sincerely,



Geoffrey M. Young

Enclosures

cc: Parties listed on the Certificate of Service

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

**RECEIVED**  
APR 21 2010  
PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

<b>APPLICATION OF KENTUCKY</b>	)	
<b>UTILITIES COMPANY FOR AN</b>	)	<b>CASE NO.</b>
<b>ADJUSTMENT OF BASE RATES</b>	)	<b>2009-00548</b>

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**PETITION OF GEOFFREY M. YOUNG  
FOR FULL INTERVENTION**

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Pursuant to 807 KAR 5:001 Section 3(8), I, Geoffrey M. Young, respectfully request that the Commission grant me full intervenor status in the above-captioned proceeding and state my support thereof as follows:

1. I am a customer of Kentucky Utilities Company (“KU”).
2. Unlike the other individual customers who applied for full intervenor status in this proceeding and had their petitions denied, there is good reason to believe that I have a special interest which is not otherwise adequately represented and that my full intervention will present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings. I therefore believe that it would be quite reasonable for the Commission to find that this petition meets the requirements of both prongs of 807 KAR 5:001, Section 3(8)(b), the regulation that determines whether full intervention shall be granted (although only one prong is needed).
3. I am an active environmentalist and a proponent of improved energy efficiency, and have been such for virtually my entire adult life. In 1977, I worked with the Clamshell

Alliance to prevent the Public Service Company of New Hampshire (PSCNH) from building a nuclear power plant in Seabrook, New Hampshire. Our strongest argument was that enhancing energy efficiency in customers' homes and businesses would have been more cost-effective for all ratepayers and would have made the power plant unnecessary. The environmentalists' position was later proven correct in that the construction of Seabrook was completed ten years later than expected, at a cost of approximately \$7 billion. The large debt involved led to the bankruptcy of PSCNH, which at that time was the fourth largest bankruptcy in United States corporate history.

Since the 1970s, I have closely followed the development of the field of energy efficiency. My entire professional career has been devoted to the goal of protecting the environment by helping to eliminate impediments to improving energy end-use efficiency in all sectors of Kentucky's economy. I worked for Kentucky's state energy office for 13 years, most of that time as the assistant director. I was the office's lead technical representative in a previous KU general rate case, Case No. 2003-00434, *An Adjustment of the Electric Rates, Terms and Conditions of Kentucky Utilities Company*. I represented the office in Case No. 98-474, *Application of Kentucky Utilities Company for Approval of an Alternative Method of Regulation of Its Rates and Service*, and two joint integrated resource plans submitted by KU and LG&E, Cases No. 99-430 and No. 2002-00367. Since leaving state government in the fall of 2004, I have continued to work to help enhance energy efficiency in Kentucky by volunteering with the Sierra Club, Kentuckians for the Commonwealth, and the Kentucky Conservation Committee. In order to build support for enhanced energy efficiency efforts among the energy utility community in Kentucky, in 2005 I initiated the formation of an informal organization called the

Kentucky Energy Efficiency Working Group, which I currently co-chair with Dick Stevie of Duke Energy. In the context of this petition, however, I am not presenting myself as a representative of or spokesperson for any organization, nor am I an attorney.

The foregoing information should establish that I could reasonably be expected to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings. This information and perspective is not likely to be provided by any other party that has been granted full intervention.

4. I have a personal interest in the quality of the air I breathe. It is hard to imagine an interest more deeply personal than my own internal airways and blood vessels and those of my wife. The quality of air we breathe is likely to affect the amount of money my wife and I will be forced to spend in future years to treat health problems that we may suffer because of KU's existing and planned power plants. As an environmentalist, I have an interest in reducing pollution that can harm other people and the natural environment.

The environmental impacts of coal-fired power plants are massive. Burning coal in Kentucky's power plants contributes to some of the worst air pollution in the Midwest. Louisville and Northern Kentucky have some of the highest rates of respiratory disease, including childhood asthma, of any metropolitan area in the region. Mercury pollution from coal-burning power plants is a significant health problem, especially for fetuses and young children. In addition, the carbon dioxide released to the atmosphere when coal is burned contributes to global climate change.

KU operates several power plants in Kentucky that emit various pollutants into the air. KU's E.W. Brown Station in Mercer County has three old, coal-burning power plants

with a combined capacity of 697 megawatts (MW), and the Tyrone Station in Woodford County has a 71-MW coal-burning power plant built in 1953. Mercer and Woodford Counties border on Fayette County where I live. KU also operates two coal-burning power plants in Muhlenberg County with a combined capacity of 163 MW. (*Kentucky's Electric Infrastructure: Present and Future*, PSC, 2005, page 15) Kentucky's weather patterns are such that my wife and I are forced to breathe pollutants from these power plants that are potentially harmful to our health. In addition, E.ON US LLC, which owns KU and LG&E, is presently building another coal-burning power plant in Trimble County.

The foregoing information should establish that I have a special interest which is not otherwise adequately represented by any other party to this case. In particular, the statutory mandate of the Attorney General is to protect the economic interests of customers as consumers, and it does not explicitly include protection of the environment or human health as it may be affected by pollution.

5. Although general rate cases usually focus primarily on issues such as the revenue requirement, cost allocation, and distribution of revenues among major customer classes, the Commission also unavoidably determines the utility's rate structures via rate cases. The rate structures, as embodied in Commission-approved tariffs, establish the economic incentives that will be faced by KU and its retail customers. As an environmentalist and a person specifically concerned with promoting improved energy efficiency, I have a special interest in the structures of the tariffs that will be established at the conclusion of this case, inasmuch as these rate structures will influence both the energy consumption patterns of end-use customers and the willingness of KU and its customers to participate actively in demand-side management (DSM) programs. The energy

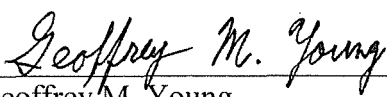
consumption patterns that will result from the set of tariffs and economic incentives established in this proceeding are reasonably likely to affect the total amount of electricity consumed and the environmental impacts caused by the generation of that electricity. These issues and concerns are not otherwise adequately represented by any of the other parties that have been granted full intervention to date, including the Attorney General.

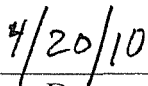
6. I am quite capable of presenting information in a clear and concise manner, submitting information requests and written comments that are directly relevant to the process of assisting the Commission staff in assessing the reasonableness of KU's tariffs and tariff structures, and abiding by the procedural schedule the Commission has established for the conduct of this proceeding, and I am very willing to do so. I plan to present issues and develop facts that will assist the Commission in fully considering the effects of various tariffs and rate structures in a constructive manner that does not unduly complicate or disrupt the proceedings.

7. Because my special interests as an environmentalist are generally consistent with the interests of KU, its customers, and the people of Kentucky, I cannot imagine why KU's attorneys would have any reason to oppose my full intervention in this case.

**WHEREFORE**, I respectfully request that I be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,

  
Geoffrey M. Young  
454 Kimberly Place  
Lexington, KY 40503  
Phone: 859-278-4966  
E-mail: energetic@windstream.net

  
Date

**CERTIFICATE OF SERVICE**

I hereby certify that an original and ten copies of the foregoing Petition for Full Intervention were mailed to the office of <sup>Jeff, D</sup> Stephanie Stumbo, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, and that true and correct copies were mailed to the following parties of record on this 20<sup>th</sup> day of April, 2010.

Lonnie E. Bellar  
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220 West Main Street  
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Hon. Robert M. Watt, III  
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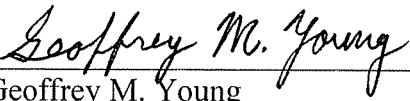
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Holly R. Smith  
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Signed,

  
\_\_\_\_\_  
Geoffrey M. Young

4/20/10  
\_\_\_\_\_  
Date