

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

APPLICATION OF LOUSVILLE GAS)
AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC) CASE NO. 2009-00549
AND GAS BASE RATES)

**KENTUCKY CABLE TELECOMMUNICATIONS
ASSOCIATION'S MOTION TO INTERVENE**

The Kentucky Cable Telecommunications Association ("KCTA") respectfully moves for full intervention in the above-referenced proceeding pursuant to K.R.S. § 278.310 and 807 KAR 5:001, § 3(8).

KCTA is a non-profit organization consisting of 118 cable television systems serving the majority of cable customers throughout Kentucky. Several KCTA members attach their facilities to the utility poles of Louisville Gas & Electric ("LG&E"), and they accordingly are directly affected by that portion of LG&E's rate-adjustment application that seeks to increase LG&E's pole attachment rates. The Commission has regularly approved KCTA's intervention in ratemaking proceedings and pole attachment cases to protect its members' interest in reasonable rates. Indeed, the Commission has regulated pole attachment rates since 1982, and KCTA has represented its members in virtually every pole attachment case that has arisen during that period.

KCTA's intervention is in lieu of the individual intervention of its affected members. Consequently, KCTA's intervention will promote the efficient progress of this proceeding by reducing the burden on other parties and on the Commission. It also will allow the interests of KCTA's members to be represented without the burden of each being required to retain its own counsel and make its own filings.

KCTA seeks full intervenor status pursuant to 807 KAR 5:001 § 3 to allow it to fully participate as a party and to be served with documents related to Kentucky Utilities' application. KCTA pledges to adhere to all Commission rules and procedures applicable to it as a party intervenor. The undersigned attorneys are authorized to represent KCTA in this proceeding and to take service of all documents.

WHEREFORE, KCTA moves for full intervention in the above proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion to Intervene was served upon the following, by U.S. Mail, postage prepaid, on this the 2nd day of February, 2010

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