

# BATES & SKIDMORE

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JACK B. BATES

IRIS G. SKIDMORE

**Via Hand-Delivery**

April 28, 2010

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

RECEIVED

APR 28 2010

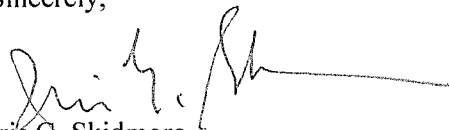
PUBLIC SERVICE  
COMMISSION

**Re: In the Matter of: An Investigation of Natural Gas Retail Competition Programs**  
Case No. 2010-00146

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

In the Matter of:

AN INVESTIGATION OF NATURAL )  
GAS RETAIL COMPETITION PROGRAMS )

CASE NO:  
2010-00146

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PUBLIC SERVICE  
COMMISSION

**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.

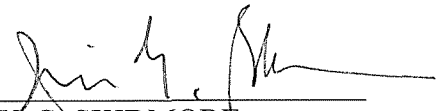
In this matter the Commission will examine natural gas retail competition programs to determine if benefits could be derived from these programs and whether these programs could be crafted to benefit consumers in Kentucky. The results of this investigation could have a significant impact on consumers who are 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 the Columbia Gas of Kentucky, Inc. service territory. CAC also administers the Delta Gas Energy Assistance Program. 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,



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COUNSEL FOR CAC

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2010, a true and accurate copy of the foregoing Motion for Full Intervention was served by United States mail, postage prepaid, to the following:

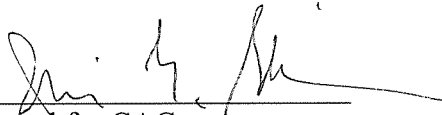
Lonnie E. Bellar  
Louisville Gas and Electric Company  
220 West Main Street  
P.O. Box 32010  
Louisville, KY 40202

John B. Brown  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

Judy Cooper  
Columbia Gas of Kentucky, Inc.  
2001 Mercer Road  
P.O. Box 14241  
Lexington, KY 40512-4241

Rocco D'Ascenzo  
Duke Energy Kentucky, Inc.  
139 East 4<sup>th</sup> Street, R. 25 At II  
P.O. Box 960  
Cincinnati, OH 45201

Mark Martin  
Atmos Energy Corporation  
3275 Highland Pointe Drive  
Owensboro, KY 42303

A handwritten signature in black ink, appearing to read 'Mark Martin', written over a horizontal line.

Counsel for CAC