



LEGAL AID SOCIETY

PURSUING JUSTICE. RESTORING HOPE

LISA KILKELLY
(502) 614-3116
LKILKELLY@LASLOU.ORG

May 27, 2010

VIA EXPRESS MAIL

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

RECEIVED

MAY 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-captioned case are an original and ten (10) copies of a Motion for Full Intervention by Association of Community Ministries.

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Lisa Kilkelly
Eileen Ordover
Attorneys for ACM

Cc: Parties of record



RECEIVED

COMMONWEALTH OF KENTUCKY

MAY 28 2010

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

In The Matter Of:

AN INVESTIGATION OF NATURAL GAS)	CASE NO.
RETAIL COMPETITION PROGRAMS)	2010-00146

MOTION FOR FULL INTERVENTION
BY ASSOCIATION OF COMMUNITY MINISTRIES

Pursuant to K.R.S. 278.310 and 807 KAR 5:001, Section 3(8), ASSOCIATION OF COMMUNITY MINISTRIES ("ACM "), by counsel, files this Motion for Full Intervention in the above-styled proceeding. ACM's address is P.O. Box 99545, Louisville, Kentucky 40269.

ACM is a Kentucky 501(c)(3) nonprofit corporation and its membership is comprised of 15 independent community ministries that provide services in the Louisville Metro area. The common mission for all 15 members is to provide an emergency assistance network in partnership with Louisville Metro Government, local congregations, and other businesses and organizations. Each community ministry serves a specific geographical area to ensure that all of Louisville Metro is covered under the umbrella of the ACM. Among the social services provided by ACM members are utility assistance programs. ACM members provide both financial assistance and advocacy to low-income households that are threatened with disconnection of utility service by Louisville Gas & Electric Co. ("LG&E") because of their inability to pay utility bills. ACM members also implement the Winterhelp program.

ACM has an interest in this proceeding as an assistance provider and advocate for low income utility customers, especially those who because of their inability to afford service are threatened with disconnection. Allowing natural gas retail competition in Kentucky could have a significant, potentially detrimental effect on access by low income utility customers to affordable natural gas service at stable rates; on the terms and conditions under which they may obtain or retain natural gas service; and on the extent to which the Commonwealth and its agencies are able to respond to any harsh effects on low-income customers that may emerge upon implementation.

ACM has participated in several matters before the Public Service Commission including the pending *Application of Louisville Gas and Electric Company for an Adjustment of Electric and Gas Base Rates, Case No. 2009-00549*; *Joint Application of Louisville Gas & Electric Co., Association of Community Ministries, Inc., People Organized and Working for Energy Reform and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program, Case No. 2007-00337* and *Application of Louisville Gas and Electric Company, Inc. for an Adjustment of its Electric and Gas Base Rates, Case No. 2008-00252*.

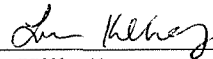
ACM represents an interest that is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

The attorneys for ACM authorized to represent it in this proceeding and to take service of all documents are:

Lisa Kilkelly
Eileen Ordover
LEGAL AID SOCIETY
416 West Muhammad Ali Blvd. Suite 300
Louisville, Ky. 40202
Phone: (502) 584-1254
Fax: (502) 584-8014
Email: lkilkelly@laslou.org; eordover@laslou.org

WHEREFORE, ACM requests that it be granted full intervention as a party to this proceeding.

Respectfully submitted,

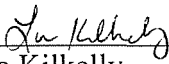


Lisa Kilkelly
Eileen Ordover
LEGAL AID SOCIETY, INC.
416 West Muhammad Ali Blvd. Suite 300
Louisville, Kentucky 40202
(502) 584-1254

Attorneys for ACM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Full Intervention by Association of Community Ministries was served on the following parties on the 27th day of May, 2010 by United States mail, postage prepaid.



Lisa Kil Kelly

Lonnie E. Bellar
Vice President – State Regulation
Louisville Gas & Electric Co.
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 4th Street, R. 25 At II
P.O. Box 960
Cincinnati, OH 45201

John M. Dosker
Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1629

Brooke E. Leslie
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117

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

Iris G. Skidmore
415 W. Main Street, Suite 2
Frankfort, KY 40601

Tom FitzGerald
Liz D. Edmonson
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602