

# HURT, CROSBIE & MAY PLLC

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June 24, 2010

RECEIVED

*Via Hand-Delivery*

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

JUN 24 2010

PUBLIC SERVICE  
COMMISSION

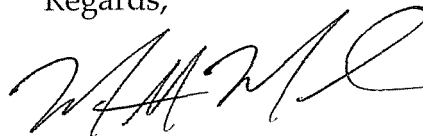
RE: *Case No. 2010-00204*

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of the Kentucky School Board Association's motion to intervene filed in this matter. By copy of this letter, all parties listed on the Certificate of Service have been served.

Please place the document of file.

Regards,



Matthew Malone

C: File

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

In the matter of:	:	CASE NO. 2010-00204
JOINT APPLICATION OF PPL CORPORATION	:	<b>RECEIVED</b>
E.ON AG, E.ON US INVESTMENTS CORP., E.ON	:	
US. LLC, LOUISVILLE GAS AND ELECTRIC	:	JUN 24 2010
COMPANY AND KENTUCKY UTILITIES	:	
COMPANY FOR APPROVAL OF AN ACQUISITION	:	PUBLIC SERVICE
OF OWNERSHIP AND CONTROL OF UTILITIES	:	COMMISSION

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**KENTUCKY SCHOOL BOARDS ASSOCIATION’S MOTION TO INTERVENE**

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Comes Kentucky School Boards Association (“KSBA”) pursuant to KRS 278.310 and 807 KAR 5:001 Section 3(8), by counsel, and moves that it be granted leave to intervene in this matter and that it be granted full intervention. In support of this Motion, KSBA states as follows:

In this matter the Commission will examine an application for PPL Corporation’s acquisition of ownership and control of E.ON. U.S. companies, including Kentucky Utilities Company (“KU”) or Louisville Gas and Electric Company (“LG&E”).

KSBA, whose address is 260 Democrat Drive, Frankfort, KY 40601, is a nonprofit corporation of school boards from each public school district in Kentucky. KSBA serves school board members and school districts in many areas including but not limited to energy policy. KSBA is governed by a 27-member board of directors made up of representatives elected as regional chairpersons or as directors-at-large. With nearly 900 school board members, KSBA is the largest organization of elected officials in Kentucky.

KSBA has involvement with energy initiatives with its representative school boards and electric and gas service and other energy costs represent a significant cost of representative school district budgets. Additionally, currently many KSBA representative schools receive

service pursuant to rate schedules of KU specific to schools (e.g. the all electric school rate in the KU territory (Rate AES)) which recognize the low risk of providing service to schools and result in greater planning certainty by the schools and lower energy requirements through the use of high efficient space conditioning technology – based upon KU’s encouragement to do so. In addition, there are many service provisions and communication matters of KU and LG&E that affect the energy utilization of schools. As such, the operating policies, practices, values, procedures and commitment to preservation of long standing partnerships of PPL Corporation as the prospective purchaser of E.ON U.S. LLC and KU and LG&E are of great importance to the KSBA.

Additionally, KSBA has intervened in other cases before the Commission previously (i) Case no. 2009-00459, *In the Matter of: General Adjustments in Electric Rates of Kentucky Power Company*; (ii) Case no. 2009-00548, *In the Matter of: Application of Kentucky Utilities Company for An Adjustment of Its Base Rates*; and (iii) Case no. 2009-00549, *In the Matter of: Application of Louisville Gas And Electric Company for An Adjustment of Its Electric and Gas Base Rates*. KSBA represents all of the public school boards within E.ON’s service territory and is their primary advocate. As such, KSBA has a special interest in this proceeding and KSBA’s interests are not adequately represented by the other parties to this proceeding. KSBA will also present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by KSBA will not unduly delay these proceedings, or unduly complicate or disrupt them.

**Wherefore**, KSBA respectfully requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,



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Counsel for the Petitioner,  
**KENTUCKY SCHOOL BOARDS ASSOCIATION**

**CERTIFICATE OF SERVICE**

I hereby certify that an original and twelve (12) copies of this Motion to Intervene were served via hand-delivery upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail, postage prepaid, on the following, all on this 24 day of June, 2010.

Hon. David C. Brown  
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ATTORNEY FOR KSBA