



LEGAL AID SOCIETY

PURSUING JUSTICE RESTORING HOPE

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May 9, 2011

Via USPS Certified/Return Receipt

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

RECEIVED

MAY 9 10 2011

PUBLIC SERVICE
COMMISSION

**Re: Case No. 2011-00134
Joint Application of Louisville Gas and Electric Company and Kentucky
Utilities Company For Review, Modification, and Continuation of Existing, and
Addition of New, Demand-Side Management and Energy-Efficiency Programs**

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter please find an original plus ten (10) copies of Motion for Full Intervention of Association of Community Ministries, Inc.

Very truly yours,

Eileen L. Ordover
Counsel for ACM

Cc: Parties of Record



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAY 10 2011

PUBLIC SERVICE
COMMISSION

In The Matter Of:

JOINT APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY AND KENTUCKY UTILITIES)	CASE NO.
COMPANY FOR REVIEW, MODIFICATION, AND)	2011-00134
CONTINUATION OF EXISTING, AND ADDITION)	
OF NEW, DEMAND-SIDE MANAGEMENT AND)	
ENERGY-EFFICIENCY PROGRAMS)	

MOTION FOR FULL INTERVENTION
OF ASSOCIATION OF COMMUNITY MINISTRIES, INC.

Now comes Association of Community Ministries, Inc. (“ACM”), by and through counsel, and moves pursuant to 807 KAR 5:001 Section 3(8) for leave to intervene in this matter, and that it be granted full intervention.

ACM is an umbrella organization comprised of the 15 independent community ministries that provide social services to low-income individuals throughout Louisville Metro, with each ministry serving a designated geographic area. All of ACM’s 15 members provide emergency financial assistance, including assistance to households in danger of losing utility service from Louisville Gas and Electric Company (“LG&E”) because they are unable to pay their energy bills. ACM member agencies also advocate for low-income customers threatened with disconnection of utility service and implement the Winterhelp program. ACM, whose address is P.O. Box 99545, Louisville, Kentucky 40269, is a Kentucky nonprofit 501(c)(3) corporation.

ACM has an interest in this proceeding as an assistance provider and advocate for low income utility customers in the LG&E service territory, who will be uniquely

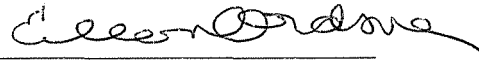
affected by the demand side management and energy efficiency programs under consideration. For example, the monthly bill impact of LG&E's proposal will have a larger relative impact on low-income customers than on others, while at the same time low-income customers are unlikely to be able to take advantage of the energy conservation opportunities thus funded to the same extent as are other customers. ACM and the LG&E customers its member agencies serve also have a unique interest in the operation of the WeCare program, which is also a subject of the instant application. Through its participation in this case, ACM will assist the Commission in developing these issues and evaluating how the demand-side management and energy-efficiency programs put forth in the application may impact low income utility customers in the LG&E service territory.

ACM has participated in a number of other matters before the Public Service Commission, including *Joint Application of PPL Corporation, E.On Ag, E.On Us Investments Corp., E.On U.S. LLC, Louisville Gas and Electric Company, and Kentucky Utilities Company for Approval of an Acquisition of Ownership and Control of Utilities, Case No. 2010-00204*; *Application of Louisville Gas and Electric Company for an Adjustment of Electric and Gas Base Rates, Case No. 2009-00549*; *An Investigation of Natural Gas Retail Competition Programs, Case No. 2010-00146*; and *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*. It represents an interest that is not otherwise adequately represented by parties to this proceeding. If granted full intervention, ACM will present issues and develop facts that will

assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, ACM requests that it be granted leave to intervene in this matter, and that it be granted full intervention with all rights set forth in 807 KAR 5:001, Section 3(8)(b).

Respectfully submitted,



Eileen L. Ordovery
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Counsel for ACM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion For Full Intervention Of Association of Community Ministries, Inc. was served on the following parties on the 9th day of May, 2011 by United States mail, postage prepaid.



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