

LEGAL AID SOCIETY

PURSUING JUSTICE RESTORING HOPE

EILEEN L. ORDOVER (502) 614-3125 EORDOVER@LASLOU ORG

July 13, 2012

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

JUL 16 2012

PUBLIC SERVICE
COMMISSION

Re: Case No. 2012-00222

Application Of Louisville Gas And Electric Company For An Adjustment Of Its Electric And Gas Rates, A Certificate Of Public Convenience And Necessity, Approval Of Ownership of Gas Service Lines And Risers, And A Gas Line Surcharge

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter please find an original plus twelve (12) copies of the Motion for Full Intervention of Association of Community Ministries, Inc.

Very truly yours,

of Kling

Lisa Kilkelly Eileen Ordover

Counsel for ACM

Cc: Parties of Record







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 day of July, 2012 by United States mail, postage prepaid.

Si Mes Lisa Kilkelly

Lonnie E. Bellar Vice President, State Regulation & Rates Louisville Gas and Electric Company 220 West Main Street P.O. Box 32010 Louisville, KY 40232

Dennis G. Howard, II Lawrence W. Cook Assistant Attorneys General 1024 Capital Center Drive. Suite 200 Frankfort, KY 40601-8204

Kendrick R. Riggs Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, KY 40202-2828

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 16 2012

PUBLIC SERVICE COMMISSION

In The Matter Of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC)	CASE NO.
AND GAS RATES, A CERTIFICATE OF PUBLIC)	2012-00222
CONVENIENCE AND NECESSITY, APPROVAL OF)	
OWNERSHIP OF GAS SERVICE LINES AND RISERS,)	
AND A GAS LINE SURCHARGE)	

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 a strong 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 any rate increase and/or surcharge. Year round, ACM member agencies provide direct service to low-income LG&E customers who cannot pay their utility bills and face disconnections. ACM member agencies do not have sufficient financial resources to assist all those in need and they are gravely concerned that increased rates will lead to more low-income LG&E customers facing shut offs and going without vital gas and electric service.

ACM has participated in a number of other matters before the Public Service Commission, including 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; Application of Louisville Gas and Electric Company, Inc. for an Adjustment of its Electric and Gas Base Rates, Case No. 2008-00252; 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; 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; and Joint Application of Louisville Gas & Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Existing, and Addition of New, Demand-Side Management and Energy-Efficiency Programs, Case No. 2011-00134. 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.

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

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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,

Lisa Kilkelly

Eileen Ordover

LEGAL AID SOCIETY, INC.

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Counsel for ACM