COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

KENTUCKY POWER COMPANY'S)	
APPLICATION FOR APPROVAL)	
OF 2011 ENVIRONMENTAL COMPLIANCE)	Case No. 2011-00401
PLAN, AND ENVIRONMENTAL SURCHARGE)	
RECOVERY AND RELATED RELIEF)	

ATTORNEY GENERAL'S MOTION TO INTERVENE

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and pursuant to KRS 367.150(8), which grants him the right and obligation to appear before regulatory bodies of the Commonwealth of Kentucky to represent consumers' interests, hereby moves the Public Service Commission to grant him full intervenor status in this action pursuant to 807 KAR 5:001(8).

Respectfully submitted,

JACK CONWAY

ATTORNEY GENERAL

JENNIFER BLACK HANS

ØENNIS G. HOWARD, II

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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Lila P. Munsey Manager, Regulatory Services Kentucky Power 101A Enterprise Dr. Frankfort, KY 40601

Mark R. Overstreet Stites & Harbison, PLLC P.O. Box 634 Frankfort, KY 40602-0634

Michael Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 E. 7th St. Ste. 1510 Cincinnati, OH 45202

this <u>May of December</u>, 2011

Assistant Attorney General