

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

KENTUCKY POWER COMPANY'S APPLICATION
FOR APPROVAL OF 2011 ENVIRONMENTAL
COMPLIANCE PLAN AND ENVIRONMENTAL
SURCHARGE RECOVERY AND RELATED RELIEF

**PUBLIC SERVICE
COMMISSION**

) Case No. 2011-00401

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MOTION TO INTERVENE OF RIVERSIDE GENERATING COMPANY L.L.C.

Pursuant to 807 KAR 5:001(3)(8), Riverside Generating Company L.L.C. (Riverside), by counsel, requests that it be granted full intervention in this matter.

1. Riverside operates a natural gas fired 836 MW electric generating facility in Zelda, KY, which is connected to the AEP Baker substation.

2. As an operator of electric generating facilities in the proximity of Kentucky Power's service area, Riverside has a special interest in the proceeding which is not otherwise represented by any other party.

3. Riverside can present issues and develop facts that will assist the Commission in its review of the application. Riverside has facilities that currently provide electric power to AEP and which are available to continue to provide that power to Kentucky Power. The facilities that Riverside has available for inclusion in Kentucky Power's Compliance Plan have not been referenced in the application submitted by Kentucky Power and have not been presented as a viable alternative to the proposal by Kentucky Power.

4. There is a demonstrable financial impact on Kentucky Power's proposed operating costs and ultimately customers' rates if Riverside's facilities are included in the analysis of Kentucky Power's proposal. Inclusion of Riverside in the Compliance Plan may help avoid

unnecessarily high rate adjustments. For example, the relatively low level of volatility in the natural gas market and the environmental benefits of natural gas compared to the proposal's reliance on coal may offer cost saving in fuel and environmental compliance.

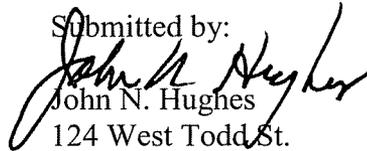
5. Riverside's experience with electric generation facilities and with Kentucky Power specifically give it detailed knowledge of the issues that are before the Commission and will provide the Commission with additional information that has not been presented and which will not otherwise be presented.

6. Riverside's intervention will not unduly complicate or delay the proceeding. The information that Riverside can present to the Commission is directly related to the issues being investigated and to the proposal being made by Kentucky Power. The information will assist the Commission in evaluation of cost effective options for meeting Kentucky Power's Compliance Plan, but at a lower cost to ratepayers.

7. Riverside's intervention will assist the Commission in determining if the Plan submitted by Kentucky Power is reasonable. Riverside's ability to offer the sale of its facilities or a contract for long term generation capacity to include in the proposed Plan will have a significant impact on the evaluation of the Compliance Plan and on the Commission's review of all reasonable options for meeting future supply needs and environmental standards. If the alternatives offered by Riverside are not considered in this proceeding, the potential to achieve the most cost effective plan for the company and its ratepayers may be jeopardized.

For these reasons, Riverside requests that it be granted full intervention in this matter.

Submitted by:



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Certificate of Service:

I certify that a copy of this motion was served on the following parties the 5th day of January, 2012:

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