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PUBLIC SERVICE COMMISSION

Via Courier

April 23rd, 2013

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

Re: Docket Case No. 2012-00578

Dear Mr. Derouen:

Enclosed for the filing are an original and ten copies of the MOTION OF ALEXANDER DESHA, TOM VIERHELLER, BEVERLY MAY, AND THE SIERRA CLUB'S MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND KENTUCKY POWER COMPANY'S FIRST REQUEST FOR INFORMATION and a certificate of service in docket 2012-00578 before the Kentucky Public Service Commission. This filing contains no confidential information.

Sincerely,

Ruben Mojica Sierra Club Environmental Law Program 85 2nd Street, 2nd Floor

> San Francisco CA, 94105 (415)977-5737

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF KENTUCKY POWER COMPANY FOR (1) A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AUTHORIZING THE TRANSFER TO THE COMPANY OF AN UNDIVIDED FIFTY PERCENT INTEREST IN THE MITCHELL GENERATING STATION AND ASSOCIATED ASSETS; (2) APPROVAL OF THE ASSUMPTION BY KENTUCKY POWER COMPANY OF CERTAIN LIABILITIES IN CONNECTION WITH THE TRANSFER OF THE MITCHELL **GENERATING STATION; (3) DECLARATORY RULINGS**; (4) DEFERRAL OF COSTS INCURRED IN CONNECTION WITH THE COMPANY'S EFFORTS TO MEET FEDERAL CLEAN AIR ACT AND RELATED REQUIREMENTS; AND (5) ALL OTHER REQUIRED APPROVALS AND RELIEF

Case No. 2012-00578

MOTION OF ALEXANDER DESHA, TOM VIERHELLER, BEVERLY MAY, AND THE SIERRA CLUB'S MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND KENTUCKY POWER COMPANY'S FIRST REQUEST FOR INFORMATION

Intervenors Tom Vierheller, Beverly May, and Sierra Club (collectively "Environmental Intervenors") request an extension of time to file responses to Commission Staff's First Request for Information and Objections and Responses to Kentucky Power Company's First Request for Information. Environmental Intervenors responses to requests for information were due by April 22, 2013. Environmental Intervenors provided digital courtesy copies to all parties and mailed

paper copies of the responses to all parties on April 22, 2013, but the copy service Environmental Intervenor's use in Frankfort, Kentucky to handle this filing was unable to print, bind, and deliver all the requisite copies to the Commission by close of business on April 22, 2013. The copy service arrived just after close of business on April 22, 2013 and deposited copies of the responses in the Commission drop box. The Commission copies are thus deemed filed on April 23, 2013. Additionally, Environmental Intervenors found additional attachments to supplement their response to Kentucky Power Information Request Item 16. These documents were included in the paper copies sent to all parties, but were not included in the responses delivered in the Commission drop box. Environmental Intervenors are filing these additional attachments with this motion. Environmental Intervenors request a one-time extension of time to file Responses to Commission Staff's First Request for Information and Objections and Responses to Kentucky Power Company's First Request for Information by Tuesday, April 23, 2013. Environmental Intervenors commit to making sure that such error will not happen again.

Respectfully submitted,

Robb W. Kapla

Sierra Club 85 Second Street

San Francisco, CA 94105

Phone: (415) 977-5716 Fax: (415) 977-5760

robb.kapla@sierraclub.org

CERTIFICATE OF SERVICE

I certify that I mailed a copy of Motion Of Alexander Desha, Tom Vierheller, Beverly May, And The Sierra Club's Motion For An Extension Of Time To File Responses To Commission Staff's First Request For Information And Kentucky Power Company's First Request For Information by first class mail on April 23rd, 2013 to the following:

Kenneth J. Gish, Jr. Attorney at Law Stites & Harbison 250 West Main Street, Suite 2300 Lexington, KY 40507

Mark R. Overstreet Attorney at Law Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KY 40602-0634

Jennifer B. Hans Assistant Attorney General's Office 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

Michael L. Kurtz Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

Ranie Wohnhas Managing Director Kentucky Power Company P. O. Box 5190 Frankfort, KY 40602

Ruben Mojica