

**Commonwealth of Kentucky
Before the Public Service Commission**

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY POWER)	
COMPANY FOR (1) A GENERAL ADJUSTMENT OF ITS RATES)	Case No.
FOR ELECTRIC SERVICE; (2) AN ORDER APPROVING ITS)	2017-00179
2017 ENVIRONMENTAL COMPLIANCE PLAN; (3) AN ORDER)	
APPROVING ITS TARIFFS AND RIDERS; (4) AN ORDER)	
APPROVING ACCOUNTING PRACTICES TO ESTABLISH)	
REGULATORY ASSETS AND LIABILITIES; AND (5) AN ORDER)	
GRANTING ALL OTHER REQUIRED APPROVALS AND RELIEF)	

**KENTUCKY LEAGUE OF CITIES
MOTION TO INTERVENE**

Comes now the Kentucky League of Cities (“KLC”) and pursuant to 807 KAR 5:001, Section 4(11) requests that it be granted intervenor status in the above-captioned proceeding. In support thereof, KLC states as follows:

1. KLC is a nonprofit membership association representing more than 380 Kentucky cities as well as municipal agencies.
2. For the purposes of this proceeding, KLC represents all municipalities receiving service from the Kentucky Power Co., which specifically includes Pikeville, Paintsville, Prestonsburg, South Shore, Grayson, Olive Hill, Inez, Salyersville, West Liberty, Jackson, Martin, Wayland, Pippa Passes, Fleming-Neon, Jenkins, Vicco, Hyden, Elkhorn City, Whitesburg, Hazard, Ashland, Louisa, Russell, Greenup, Coal Run Village, and Buckhorn.
3. KLC has a special interest in this case that cannot be represented by any other party. KLC’s membership includes a diversity of cities in terms of size, population,

infrastructure and geographic location within the Commonwealth. The interests of these cities cannot adequately be represented by any other party.

4. The Kentucky Power Co. lighting tariffs impact cities throughout the service territory. As KLC represents the customers paying the majority of revenue generated under these tariffs, KLC and its membership has a particular interest in the rates charged under these tariffs.
5. Proposed changes to the lighting class rate design, including the increase to monthly installation costs and the proposed addition of a base fuel rate, will have a great impact upon KLC's membership's costs and policy decisions. In addition, the currently proposed revenue allocation does little to address the disparity of ROR between classes. The full extent of these impacts cannot be determined without the opportunity to participate fully in this case.
6. KLC's participation in this case is likely to present issues and develop facts that will assist the Commission in fully considering the matter and will not unduly complicate or disrupt the proceeding. KLC intends to participate in every aspect of the case, including offering testimony on the impact of the proposed rate increase on KLC's membership.
7. The attorneys authorized to represent Kentucky League of Cities in this matter and take service of all documents are:

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WHEREFORE, the Kentucky League of Cities moves the Commission to issue an Order granting status as an intervenor party in this action pursuant to 807 KAR 5:001, Section 4(11).

Respectfully submitted,



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