## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

Park of

In the Matter of:

INVESTIGATION INTO THE )
MEMBERSHIP OF LOUISVILLE )
GAS AND ELECTRIC )
AND KENTUCKY UTILITIES )
COMPANY IN THE MIDWEST )
INDEPENDENT TRANSMISSION )
SYSTEM OPERATOR, INC )

CASE NO. 2003-00266

## MOTION TO INTERVENE

Comes the Attorney General, A. B. Chandler, III, 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 the consumers interests, moves the Public Service Commission to grant him full intervenor status in this action pursuant to 807 KAR 5:001(8).

DENNIS G. HOWARD,

ELIZABETH E. BLACKFORD ASSISTANT ATTORNEYS GENERAL

1024 CAPITAL CENTER DRIVE,

SUITE 200

FRANKFORT KY 40601-8204

(502) 696-5453

FAX: (502) 573-8315

dennis.howard@law.state.ky.us betsy.blackford@law.state.ky.us

## NOTICE OF FILING AND CERTIFICATE OF SERVICE

I hereby give notice that I have filed the original and ten true copies of the foregoing Motion to Intervene with the Executive Director of the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky this the 23<sup>rd</sup> day of July, 2003, and further certify that I have served the parties to this action by mailing a true copy of the Motion, postage prepaid, this same day to the following:

11 Black

HON MICHAEL S BEER P O BOX 32010 LOUISVILLE KY 40232-2010

and

HON ALLYSON K STURGEON HON KENDRICK R RIGGS OGDEN NEWELL & WELCH PLLC 1700 CITIZENS PLAZA 500 WEST JEFFERSON STREET LOUISVILLE KY 40202 2874