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COMMONWEALTH OF KENTUCKY

APR 27 2005

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

In the Matter of:)	
)	Case No. 2005-00042
AN ADJUSTMENT OF THE GAS RATES)	
OF THE UNION LIGHT, HEAT AND)	
POWER COMPANY)	

MOTION FOR ADMISSION PRO HAC VICE


John J. Finnigan, Jr., an attorney licensed to practice in the Commonwealth of Kentucky, hereby moves the Commission to admit Kate E. Moriarty to practice law before the Commission *pro hac vice*, on behalf of The Union Light, Heat and Power Company, in the above-captioned proceeding.

Kate E. Moriarty is Assistant General Counsel employed by Cinergy Services, Inc., an affiliate company of The Union Light, Heat and Power Company. Applicant's business address is 139 East Fourth Street, 25th Floor Atrium II Building, Cincinnati, Ohio 45201. Further, Ms. Moriarty, having been admitted in 1996, is a member in good standing with the bar of the state of Ohio, Registration No. 0067274, and has never been suspended, disbarred or resigned as a result of disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction. No disciplinary proceeding has ever been filed against Ms. Moriarty, nor is any presently pending against her in any jurisdiction. In connection with this proceeding, Ms. Moriarty agrees to be subject to the rules of the Commission and the Kentucky Bar Association. An affidavit executed by Ms. Moriarty attesting to these facts is attached hereto.

Furthermore, attached please find the original Kentucky Bar Association Out-Of-State Certification on behalf of Kate E. Moriarty indicating Ms. Moriarty's compliance with Supreme Court Rule 3.030(2), and the attached Affidavit of Kate E. Moriarty.

WHEREFORE, The Union Light, Heat and Power Company, through counsel, specifically requests the Commission to grant its motion to allow Kate E. Moriarty to appear and practice before it in the above-entitled matter *pro hac vice*.

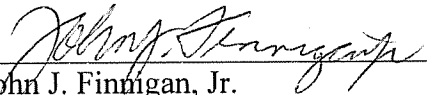
Respectfully submitted,



John J. Finnigan, Jr. (86657)
Senior Counsel
Cinergy Services, Inc.
139 E. Fourth Street, 2500 Atrium II
Cincinnati, Ohio 45201
(513) 287-3601
Fax (513) 287-3810
John.Finnigan@Cinergy.com

CERTIFICATE OF SERVICE

I hereby certify that I have on this 26th day of April, 2005, served the foregoing Motion for *Pro Hac Vice* by mailing copies, first class, postage prepaid, to the parties of record in this case, listed below.



John J. Finnigan, Jr.
Senior Counsel

Honorable Elizabeth E. Blackford
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, Kentucky 40601-8204
Betsy.blackford@law.state.ky.us

AFFIDAVIT OF KATE E. MORIARTY


State of Ohio)
) SS:
County of Hamilton)

Comes now Kate E. Moriarty, Assistant General Counsel, employed by Cinergy Services, Inc., an affiliate of The Union Light, Heat and Power Company, and does hereby attest as follows:

(1) I was admitted to the bar of the state of Ohio in 1996, Registration No. 0067274, am a member in good standing with the bar of that state, and have never been suspended, disbarred or resigned as a result of disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction. No disciplinary proceedings have ever been filed against me, nor are any presently pending against me in any jurisdiction.


(2) I agree to be subject to the rules of the Commission and the Kentucky Bar Association in connection with the proceedings before the Public Service Commission in Case No. 2005-00042.

(3) I have complied with Supreme Court Rule 3.030(2), and hereby attach a copy of the Kentucky Bar Association Out-Of-State Certification provided to me.

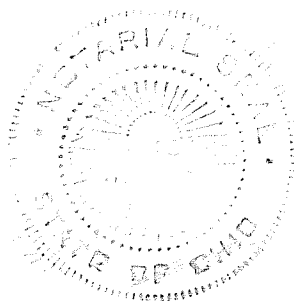


Kate E. Moriarty, Affiant

Sworn and subscribed before me by Kate E. Moriarty on this 26th day of April, 2005.



Notary Public



My Commission Expires:

KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET
FRANKFORT, KENTUCKY 40601-1883
(502) 564-3795
FAX (502) 564-3225

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KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

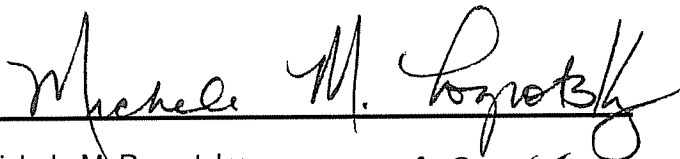
COURT Kentucky Public Service Commission

CASE NO. 2005-00042

SCR 3.030 Membership, practice by nonmembers and classes of membership

(2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$100.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee.

The Kentucky Bar Association certifies that Kate Ellen Moriarty has
paid the per case fee of \$100.00 in the above referenced case as required in SCR 3.030(2).



Michele M. Pogrotsky
Director of Accounting / Membership
2-22-05