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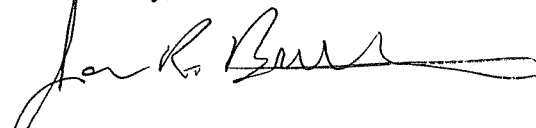
Ms. Elizabeth O'Donnell, Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY

**Re: In the Matter of:**  
**CONSIDERATION OF THE REQUIREMENTS OF THE FEDERAL ENERGY POLICY ACT OF 2005 REGARDING TIME-BASED METERING, DEMAND RESPONSE AND INTERCONNECTION SERVICE, CASE NO. 2006-00045**

Dear Ms. O'Donnell:

I hereby submit for filing in the above captioned-case the original and ten (10) copies of the Petition to Intervene of PJM Interconnection, L.L.C. Thank you for your consideration of our request. Please contact me if you have any questions or if I can be of further assistance.

Sincerely,



Jason R. Bentley

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

MAR 24 2006

In the Matter of:

PUBLIC SERVICE  
COMMISSION

CONSIDERATION OF THE	)	
REQUIREMENTS OF THE FEDERAL	)	
ENERGY POLICY ACT OF 2005	)	Administrative Case No.
REGARDING TIME-BASED METERING,	)	2006-00045
DEMAND RESPONSE AND	)	
INTERCONNECTION SERVICE	)	

**PETITION TO INTERVENE OF  
PJM INTERCONNECTION, L.L.C.**

Pursuant to KRS 228.310 and 808 KAR 5:001 section 3(8), PJM Interconnection, L.L.C. (hereinafter "PJM") requests that it be granted full intervenor status in the above-captioned Administrative Case and state in support thereof as follows:

1. The Petitioner, PJM, has its offices located at 955 Jefferson Avenue, Valley Forge Corporate Center, Norristown, Pennsylvania 19403-2497. The Petitioner's attorney for the purpose of receiving service of all Commission Orders in this proceeding is Jason R. Bentley, McBrayer, McGinnis, Leslie & Kirkland, PLLC, 305 Ann Street, Suite 308, Frankfort, Kentucky 40601.

2. PJM is a Regional Transmission Organization (RTO) approved by the Federal Energy Regulatory Commission (FERC) to operate the transmission grid in all or part of thirteen (13) States and the District of Columbia. PJM is responsible for ensuring the safe and reliable operation of the transmission system and facilitating the reliable supply of energy from generating resources to

wholesale customers in the PJM region. PJM operates the largest competitive wholesale electricity market in the world.

3. Kentucky Power Company, a subsidiary of American Electric Power (AEP), is a member of PJM with a service territory located in Kentucky.

4. PJM's market provides wholesale buyers and sellers of electricity with both real-time and forward pricing information. PJM has extensive experience relating to the effects of both retail electricity pricing models, including demand response programs, and interconnection standards for on-site generating facilities on the operation of wholesale markets and the transmission grid.

5. PJM has an interest in this Administrative Case that is not adequately represented by other parties to this proceeding. The outcome of this Administrative Case may impact the operation of Kentucky Power's transmission system or PJM's wholesale electricity markets.


6. Full intervention by PJM is likely to present issues and develop facts that will assist the commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, PJM respectfully requests the Commission to grant its Petition to Intervene and to allow it to participate with full intervenor status in this proceeding.

Dated this 24<sup>th</sup> day of March, 2006.

Respectfully submitted,

MCBRAYER, MCGINNIS, LESLIE &  
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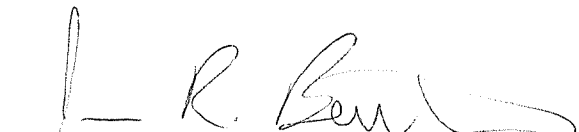
JASON R. BENTLEY  
ATTORNEY FOR PETITIONER,  
PJM INTERCONNECTION, LLC.

**CERTIFICATE OF SERVICE**

It is hereby certified that an original and ten (10) copies of the Petition to Intervene on behalf of PJM Interconnection, L.L.C., in the aforementioned case were hand-delivered upon the following:

Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40601

And that one (1) copy of the Petition was served via U.S. mail, postage pre-paid, upon the attached service list this 24<sup>th</sup> day of March, 2006.



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