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Commonwealth of Kentucky Before the Public Service Commission

JAN 0 3 2007 **PUBLIC SERVICE** COMMISSION

In the Matter of: DIVISION OF WATER REQUEST TO INITIATE PROCEEDINGS PURSUANT TO KRS 278.021 IN ORDER TO FACILITATE HAVING A RECEIVER) APPOINTED ON A PERMANENT BASIS AS SOON) AS POSSIBLE REGARDING FIVE (5) PACKAGE PLANTS OWNED AND/OR OPERATED BY **JEFFERY LANCE BOWLING**

Case No. 2006-00569

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ATTORNEY GENERAL'S MOTION TO INTERVENE

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, pursuant to KRS 367.150(8), and moves to intervene in the above-styled proceeding. The Attorney General requests that he be permitted to intervene as a party to the fullest extent permitted by law in order to execute his statutory duties pursuant to KRS 367.150(8).

Respectfully submitted,

GREGORY D. STUMBO ATTORNEY GENERAL

David Edward Spercent

David Edward Spenard Assistant Attorney General 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204 502 696-5457

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of this Motion to Intervene were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct of the same, first class postage prepaid, to David Morgan, Director, Division of Water, Frankfort Office Park, 14 Reilly Road, Frankfort, Kentucky 40601, all on this 3rd day of January 2007.

> Danie Edward Spench Assistant Attorney General