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June 8, 2007

RECEIVED

JUN 08 2007

PUBLIC SERVICE
COMMISSION

Hon. Elizabeth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Re: Case No. 2007-00155
Kentucky Power Company

Dear Ms. O'Donnell:

We enclose for filing an original and ten (10) copies of the Motion of Equitable Resources, Inc. for Full Intervention in the above-captioned case. Thanks you for your assistance.

Sincerely,

Robert M. Watt, III

Rmw
Encl.

Cc: David K. Dewey, Esq. (w/encl.)
Mark R. Overstreet, Esq. (w/encl.)
Mr. Errol K. Wagner (w/encl.)
Michael L. Kurtz, Esq. (w/encl.)
Dennis G. Howard, II, Esq. (w/encl.)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 08 2007

PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF KENTUCKY)
POWER COMPANY FOR A CERTIFICATE)
OF CONVENIENCE AND NECESSITY) **CASE NO. 2007-00155**
TO CONSTRUCT A 138 KV TRANSMISSION)
LINE IN FLOYD COUNTY, KENTUCKY)

* * * * *

MOTION OF EQUITABLE RESOURCES, INC.
FOR FULL INTERVENTION

Equitable Resources, Inc. (“Equitable Resources”) respectfully moves the Commission, pursuant to 807 KAR 5:001, Section 3(8), for the entry of an order granting it full intervention in the within-styled proceeding. As set forth below, Equitable Resources has a special interest in this proceeding which is not otherwise adequately represented and full intervention by Equitable Resources is likely to present issues and to develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. Accordingly, the Commission should grant full intervention to Equitable Resources.

Equitable Resources is an integrated energy company with emphasis on Appalachian area natural gas supply, gathering, transmission, storage and distribution, with significant operations in eastern Kentucky. Its subsidiary, Equitable Production Company produces natural gas in eastern Kentucky. Its subsidiary, Kentucky West Virginia Gas Company, LLC, operates gas gathering lines in eastern Kentucky. Its subsidiary Equitable Gathering, LLC (“Equitable Gathering”), operates natural gas

compression and processing equipment in eastern Kentucky, including a natural gas processing facility located near Langley in Floyd County, Kentucky. Finally, Equitable Resources' interstate pipeline subsidiary, Equitrans, L.P. ("Equitrans"), operates interstate storage and transmission facilities including a new 70-mile pipeline currently under construction in eastern Kentucky and described in more detail below.

1. Over the last several years, natural gas producers in eastern Kentucky have been plagued by natural gas transmission capacity constraints that have forced them to shut-in their wells. In approximately April 2005, Equitable Resources began planning new infrastructure that would create incremental transmission capacity and alleviate those persistent shut-in conditions. To this end, Equitable Gathering began the expansion of its eastern Kentucky processing facility to approximately double its extraction capabilities. The plant is scheduled to be completed later this year. This newly expanded facility, referred to as the Langley Plant, is slated to receive electric power from the proposed electric transmission line that is the subject of this proceeding. In conjunction with Equitable Gathering's increased processing capacity, Equitrans developed its proposed Big Sandy pipeline, a 70-mile mainline transmission system spanning from the Langley Plant to an interconnection with Tennessee Gas Pipeline Company. The new processing plant expansion will cost on the order of \$75 million, and the new transmission pipeline will require an additional \$150 million of capital investment. This capital investment will go a long way toward resolving the natural gas infrastructure problems facing eastern Kentucky producers. However, without the electric power which will be transmitted over the line that is the subject of this proceeding, Equitable Gathering will not be able to

operate its Langley Plant and the existing production in eastern Kentucky will continue to be shut-in.

2. Currently there are over 1,700 wells that are shut-in and are now awaiting access to market. Once the processing plant expansion is complete and the Big Sandy Pipeline is placed into service, producers will be able to bring an additional 130,000 dekatherms of natural gas to market. Moreover, the project will provide new jobs and provide economic growth to the eastern Kentucky area. In light of the benefits to be gained by this project, Equitable Resources respectfully requests that the Commission approve the application of Kentucky Power with reasonable dispatch.

3. Equitable Resources requests that copies of all orders, pleadings and other communications related to this proceeding be directed to:

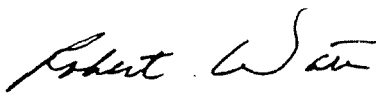
David K. Dewey
Equitable Resources, Inc.
225 North Shore Drive
Pittsburgh, PA 15212

Robert M. Watt, III
Stoll Keenon Ogden, PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507

WHEREFORE, Equitable Resources respectfully requests the Commission to enter an order granting it full intervention in this proceeding.

Respectfully submitted,

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By 
Counsel for Equitable Resources, Inc.

CERTIFICATE OF SERVICE

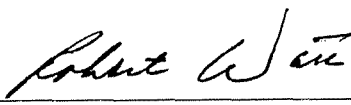
This is to certify that the foregoing pleading has been served by mailing a copy of same, postage prepaid, to the following persons on this 8th day of June 2007:

Mark R. Overstreet, Esq.
Stites & Harbison, PLLC
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Frankfort, KY 40602-0634

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By 
Counsel for Equitable Resources, Inc.