

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR APPROVAL OF A)
REVISED COLLECTION CYCLE FOR PAYMENT) CASE NO. 2007-00410
OF BILLS)

**ATTORNEY GENERAL'S MOTION IN SUPPORT
OF THE PETITION OF AARP TO INTERVENE IN THE MATTER**

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and files herein his motion in support of the November 13, 2007 Petition to Intervene of AARP ("Association for the Advancement of Retired People") and for admission of AARP as a full intervenor in the matter.

Although the Attorney General is charged, pursuant to KRS 367.150(8), with the right and obligation to appear before regulatory bodies of the Commonwealth of Kentucky to represent consumers' interests, his office would note that this right to intervene on behalf of consumers is not exclusively reserved to his office and the Commission has discretion to grant intervenor status to other persons or organizations if: (1) the moving party has a special interest in the proceeding which is not otherwise adequately represented, or (2) full intervention by the party is likely to present issues or develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. 807 KAR 5:001, Section 3(8).

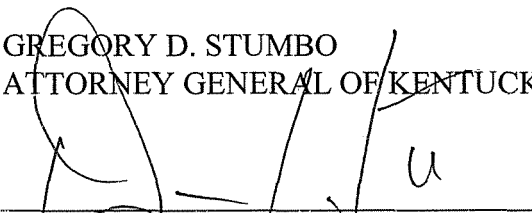
In this matter, the AARP expresses a special interest in the matter which the organization believes is not adequately represented. While the Attorney General's representation of the consumer encompasses the entire cross-section of consumers in the state, the AARP with its focus exclusively upon the representation of retired persons represents a valid special interest

whose views may not be representative of the typical consumer. Indeed, KIUC and CAC, by way of example, are routinely allowed intervention in cases before the Commission even though their clients likewise fall within the Attorney General's cross-section of consumers.

Additionally, the Attorney General believes that inclusion of AARP in the matter is likely to present additional issues and the development of facts which would assist the Commission in fully considering the matter without unduly delaying or disrupting the proceedings. Simply put, the Attorney General does not object to the granting of full intervenor status to AARP and, in fact, supports its inclusion.

Respectfully submitted,

GREGORY D. STUMBO
ATTORNEY GENERAL OF KENTUCKY



DENNIS HOWARD II
PAUL D. ADAMS
ASSISTANT ATTORNEYS GENERAL
FRANKFORT KY 40601-8204
(502) 696-5453
FAX: (502) 573-8315
dennis.howard@ag.ky.gov

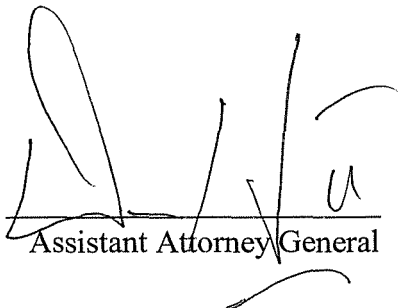
CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 16th day of November, 2007, I have filed the original and ten copies of the foregoing with the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

Honorable Allyson K. Sturgeon
Corporate Counsel
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, Kentucky 40202

Lonnie E. Bellar
Vice President State Regulation and Rates
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, Kentucky 40202

Cathy Allgood Murphy
AARP Kentucky State Office
10401 Linn Station Rd., Ste. 121
Louisville, KY 40223



Assistant Attorney General