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PUBLIC SERVICE
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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF KENTUCKY POWER COMPANY) CASE NO.
FOR GENERAL ADJUSTMENT OF ITS EXISTING RATES) 2013-00197

ATTORNEY GENERAL'S
MOTION TO HOLD CASE IN ABEYANCE,
OR ALTERNATIVELY, MOTION FOR AN EXPANSION OF TIME
TO FILE PRELIMINARY REQUESTS FOR INFORMATION

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and pursuant to 807 KAR 5:001 Section 5, hereby moves that the Commission hold the above-styled matter in abeyance pending the Commission's resolution of Case No. 2012-00578. In support of this motion, the Attorney General states as follows:

In its Application for a General Adjustment of its Rates, Kentucky Power Company ("KPCo" or the "Company") specifically provides that the reason for the major proposed revenue increase is "to provide a return on and of the Company's increased capitalization as a result of the proposed transfer of the Mitchell Generating Station." See Application at p. 5, ¶11(a). Further, the Company seeks a 31% increase to residential ratepayers, *id.* at p. 7, which is identical to the proposal contained in the Company's environmental surcharge case, which the Company withdrew before the Commission could enter a final order. See, generally, Case No. 2011-00401; see also, Case No. 2012-00578, Hearing, Pauley TE on Cross, July 10, 2012, VTE at 10:54:35-10:54:50 advising a 31% actual impact on customers.

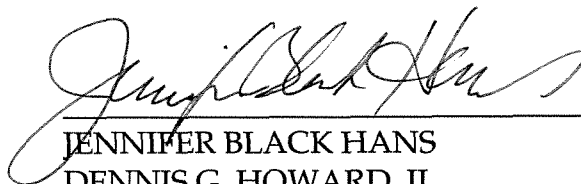
The Commission held public hearings in Case No. 2012-00578 on July 10-12, 2013, post-hearing briefs were filed on August 12, 2013, and the matter is pending a final order. Since the instant case is moot without a Commission order approving Kentucky's Power's application in Case No. 2012-00578, it would be illogical, unnecessary, and contrary to judicial economy to proceed with the instant proceeding until a final order is entered in Case No. 2012-00578.

Therefore, the Attorney General respectfully requests that the Commission delay any and all further proceedings in the instant matter until after the date the Commission issues its final order in Case 2012-00578.

Alternatively, the Attorney General moves for an expansion of time for the filing of his initial requests for information to and including Wednesday, September 4, 2013, subject to and with the Attorney General agreeing to the following conditions that will permit a full consideration of this matter without unduly complicating or disrupting the proceedings: (1) that the Attorney General will not seek to request information that is duplicative to the initial requests for information previously tendered in this matter; and (2) that KPCo will have until and including September 18, 2013, to respond to the Attorney General's initial requests for information without otherwise expanding the remaining schedule in this matter.

WHEREFORE, the Attorney General requests an Order from the Commission to address its alternative motions set forth herein.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

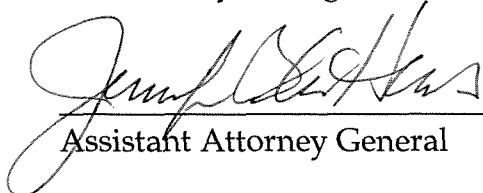
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this 27th day of August, 2013.


Assistant Attorney General