

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION MAY 1 3 2004

In the Matter of:

PUBLIC SERVICE

## AN ADJUSTMENT OF RIDER AMRP OF THE ) UNION LIGHT, HEAT AND POWER COMPANY )

CASE NO. 2004-00098

## ATTORNEY GENERAL'S MOTION TO INTERVENE

Comes the Attorney General, Gregory D. Stumbo, by and through his office of rate intervention, and pursuant to KRS 367.150 (8), which grants him the right and obligation to appear before regulatory bodies of the Commonwealth of Kentucky to represent the consumers interests, moves the Public Service Commission to grant him full intervenor status in this action pursuant to 807 KAR 5:001(8). The Attorney General is cognizant of the procedural schedule issued April 23, 2004 and will abide by that schedule.

ELIZABETH E. BLACKFORD ASSISTANT ATTORNEY GENERAL 1024 CAPITAL CENTER ORIVE, SUITE 200 FRANKFORT KY 40601-8204 (502) 696-5453 FAX: (502) 573-8315 betsy.blackford@ag.ky.gov

## NOTICE OF FILING AND CERTIFICATE OF SERVICE

I hereby give notice that I have filed the original and ten true copies of the foregoing Motion to Intervene with the Executive Director of the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky this the 13<sup>th</sup> day of May, 2004 and further certify that I have served the parties to this action by mailing a true copy of the Motion, postage prepaid, this same day to the following:

JOHN J FINNIGAN JR ESQ SENIOR COUNSEL UNION LIGHT HEAT & POWER CO 139 E FOURTH STREET CINCINNATI OH 45202

ANITA M SCHAFER PARALEGAL UNION LIGHT HEAT & POWER CO 139 E FOURTH STREET CINCINNATI OH 45202

11 De M