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Commonwealth of Kentucky
Before the Public Service Commission

SEP 15 2004

PUBLIC SERVICE
COMMISSION

In the Matter of:

ALLEGED FAILURE TO COMPLY WITH)
KRS 278.300, KRS 278.020(1) AND) Case No. 2004-00101
COMMISSION'S ORDER IN CASE 1999-00225)

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 Spenard

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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 Robert L. Brown III, 1005 South Main Street, Suite 101, Corbin, Kentucky 40701; David Hutchinson, CitiPower, LLC, 2122 Enterprise Road, Greensboro, North Carolina 27408; and Dan Forsberg, CitiPower, LLC, 2122 Enterprise Road, Greensboro, North Carolina 27408, all on this 15th day of September 2004.

David Edward Speman
Assistant Attorney General