COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

Dr., By RECEIVED

JUN 2 4 2004

PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

| THE APPLICATION OF UNION LIGHT, HEAT |) | |
|--------------------------------------|---|---------------------|
| AND POWER COMPANY FOR ECONOMIC |) | CASE NO. 2004-00253 |
| DEVELOPMENT TARIFFS |) | |

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 states that he is aware of the procedural schedule and is willing to abide by that schedule.

ELIZABETH E. BLACKFORD

ASSISTANT ATTORNEY GENERAL

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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 24th day of June, 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:

Honorable John J. Finnigan, Jr. Senior Counsel The Union Light Heat & Power Co 139 E. Fourth Street Cincinnati, OH 45202

Mr. Donald J. Rottinghaus Manager, Rate Services The Union Light Heat & Power Co 139 E. Fourth Street Cincinnati, OH 45202

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