

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

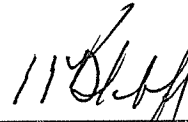
In the Matter of:

APPLICATION OF THE UNION LIGHT, HEAT AND)
POWER COMPANY FOR APPROVAL OF)
MODIFICATIONS TO ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND) CASE NO. 2005-00096
LIABILITIES RELATED TO CERTAIN)
MISO-RELATED COSTS AND REVENUES NOT)
ALREADY INCLUDED IN EXISTING BASE RATES)

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 March 23, 2005, and seeks no change in that schedule.

GREGORY D. STUMBO
ATTORNEY GENERAL



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NOTICE OF FILING AND CERTIFICATE OF SERVICE

Notice is hereby given that the original and ten true copies of the foregoing have been filed with the Executive Director of the Kentucky Public Service Commission by hand delivery to 211 Sower Boulevard, Frankfort, Kentucky 40601, this the 31st day of March, 2005. I further certify that this same day the parties have been served by mailing a true copy, postage prepaid, to Counsel of Record as follows:

JOHN J FINNIGAN JR ESQ
SENIOR COUNSEL
THE UNION LIGHT HEAT AND POWER COMPANY
139 EAST FOURTH STREET
CINCINNATI OH 45202

