

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAY 27 2005

PUBLIC SERVICE
COMMISSION

In the Matter of the:

APPLICATION OF THE UNION LIGHT,)
HEAT AND POWER COMPANY TO)
IMPLEMENT A HEDGING PROGRAM) CASE NO. 2005-00191
TO MITIGATE PRICE VOLATILITY IN)
THE PROCUREMENT OF NATURAL GAS)

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 27th day of May, 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
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