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NOV 0 & 2005

November 2, 2005

MOIODIMANO PUBLIC SERVICE

Erankfort, KY 40601 211 Sower Boulevard Public Service Commission of Kentucky Executive Director Hon. Elizabeth O'Donnell

Case No.: 2005-00341 General Adjustment in Electric Rates of Kentucky Power Company Re:

Dear Ms. O'Donnell:

in the enclosed self-addressed stamped envelope. referenced proceeding. Please file stamp one of the 11 copies and return it to me Cable Telecommunications Association's Motion to Intervene in the above-Enclosed please find the original and 11 copies of the Kentucky

Thank you for your attention to this matter and please let me know it

there are any questions.

Very truly yours,

Frank F. Chuppe

WYATT, TARRAUT & COMBS, LLP

Gardner Gillespie Enclosures FFC/pw

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## COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

RECEIVED

GENERAL ADJUSTMENT IN ELECTRIC
RATES OF KENTUCKY POWER COMPANY

CASE NO. 2005-0034 NOV 0 4 2005

PUBLIC SERVICE COMMISSION

## KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S MOTION TO INTERVENE

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The Kentucky Cable Telecommunications Association ("KCTA") moves to intervene in the above-referenced proceeding pursuant to 807 KAR 5:001, § 3 and 5:001, § 10. KCTA is a non-profit organization consisting of more than one hundred cable television systems serving the majority of cable television customers throughout Kentucky. KCTA members are directly affected by that portion of Kentucky Power Company's ("Kentucky Power") Application for an Adjustment that seeks to increase its pole attachment rates because they are attached to Kentucky Power's utility poles. KCTA affected members within Kentucky Power's Service Area are Insight Communications, Adelphia, Armstrong Utilities, Big Sandy Cable TV, TV Service, and Inter Mountain Cable.

KCTA's intervention is in lieu of the individual intervention of its affected members. Consequently, KCTA's invention will promote the efficient progress of this proceeding. Further, KCTA seeks full intervention pursuant to 807 KAR 5:001, § 3(a) to allow it to fully participate as a party and to be served with documents related to Kentucky Power's Application.

This Commission has regulated pole attachment rates since 1982. In that time KCTA has regularly represented its members in virtually every pole attachment rate case that has arisen before the Commission. KCTA seeks intervention in this proceeding in lieu of the

intervention of its three members named above. Allowing the KCTA's intervention would allow the interests of the six utility customers named above to be represented without the burden of each being required to retain its own counsel and make its own filings; for the same reasons allowing KCTA's intervention on their behalf will reduce the burden on the other parties and the Commission as well.

KCTA pledges to adhere to all Commission rules and procedures applicable to it as a party intervenor in this proceeding.

WHEREFORE, KCTA moves for full intervention in the above-referenced proceeding.

Respectfully submitted,

Gardner F. Gillespie HOGAN & HARSTON, L.L.P. 555 Thirteenth Street Washington, DC 20004-1109

Frank F. Chuppel

WYATT, TARRANT & COMBS, LLP 500 West Jefferson Street, Suite 2600

Louisville, KY 40202

(502) 562-7336

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that an original and ten photocopies of the foregoing were served by U.S. Mail, postage prepaid, upon Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601; and a copy of the foregoing was served upon Bruce F. Clark, Mark R. Overstreet, Judith A. Villines, Stites & Harbison, 421 West Main Street, P.O. Box 634, Frankfort, KY 40602-0634; Richard G. Roff, Public Service Commission of Kentucky, 211 Sower Boulevard, P.O. Box 615, Frankfort, KY 40602-0615; David F. Boehm, Michael L. Kurtz, Boehm, Kurtz & Lowry, 2110 CBLD Center, 36 East Seventh Street, Cincinnati, Ohio 45202; and Dennis G. Howard II and Elizabeth E. Blackford, Assistant Attorneys General, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204 by U.S. Mail, postage prepaid, this 241 day of November, 2005.

Frank F. Chuppe

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