## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION



OCT 0 5 2006

In the Matter of:

PUBLIC SERVICE COMMISSION

JOINT APPLICATION OF KENTUCK	Υ)	
POWER COMPANY AND KENTUCE	KY)	
ASSOCIATION FOR COMMUNITY	)	
ACTION, INC. FOR THE	)	CASE NO. 2006-00373
ESTABLISHMENT OF A HOME	)	
ENERGY ASSISTANCE PROGRAM	)	

## ATTORNEY GENERAL'S MOTION FOR LEAVE TO CONDUCT DISCOVERY

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and pursuant to the Commission's order of September 21, 2006, hereby moves the Commission for leave to conduct discovery in this matter.

Respectfully submitted,

GREGORY D. STUMBO ATTORNEY GENERAL

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## Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of this Motion for Leave to Conduct Discovery were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Hon. Mark R. Overstreet Attorney At Law Stiles & Harbison P.O. Box 634 Frankfort, KY 40602-0634

Joe F. Childers 201 W. Short St. Ste. 310 Lexington, KY 40507

Mr. Thomas "Kip" Bowmar Executive Director Kentucky Association for Community Action 101 Burch Ct. Frankfort, KY 40601

Errol K. Wagner Director, Regulatory Services American Electric Power P. O. Box 5190 Frankfort, KY 40602

This  $\frac{5}{4}$  day of October, 2006.

LAWRENCE W. COOK

ASSISTANT ATTORNEY GENERAL