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January 26, 2010

RECEIVED

JAN 2 7 2010

Jeff R. Derouen Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602-0615 PUBLIC SERVICE COMMISSION

RE: The Application For General Adjustment Of Electric Rates Of Kentucky Power Company Case No. 2009-00459

Dear Mr. Denrouen:

Enclosed are the original and ten copies of the Motion to Intervene which I am submitting on behalf of the Pike County Senior Citizens Programs, Inc. I would appreciate if you would see that this Motion is properly filed and brought to the attention of the Public Service Commission.

Thank you for your attention to this matter.

Sincerely,

Attorney at Law

Enclosures

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF: THE APPLICATION FOR GENERAL ADJUSTMENT OF ELECTRIC RATES OF KENTUCKY POWER COMPANY JAN 2 7 2010

PUBLIC SERVICE

COMMISSION

Case No. 2009-00459 MOTION TO INTERVENE OF PIKE COUNTY SENIOR CITIZENS PROGRAM, INC.

Pursuant to K.R.S. 278.310 and 807 KAR 5:00l Section 3(8), the Pike County Senior Citizens Programs, Inc., requests that it be granted limited intervenor status in the above-captioned proceeding and states in support thereof as follows:

- 1. The Pike County Senior Citizens Programs, Inc., is a non-profit corporation incorporated in 1989 consisting of the directors of the senior citizens centers and other social services staff serving the needs of the elderly in Pike County, Kentucky.
- 2. The electric rate increase being considered by the Commission in this case would have a significant impact on the elderly residents of Pike County. Electricity represents a substantial cost for the Pike County elderly population, most of whom are no longer able to work and who depend on a limited and fixed income from public benefits to pay for their expenses. Many of the senior persons served by the Pike County Senior Citizens Programs, Inc., have incomes below the poverty level. These elderly residents served by the Pike County Senior Citizens Programs, Inc., are customers of Kentucky Power Company.
- 3. 807 KAR 5:001 Section 3(8) states that any person who wishes to become a party to a proceeding before the commission may by timely motion request that he be granted leave to intervene.
- 4. The position of the Pike County Senior Citizens Programs, Inc., cannot be adequately represented by any existing party. The Pike County Senior Citizens Programs, Inc., intends to

play a constructive role in the Commission's decision-making process herein and the Pike County Senior Citizens Programs, Inc.'s participation will not unduly prejudice any party.

WHEREFORE, the Pike County Senior Citizens Programs, Inc., requests that it be granted limited intervenor status in the above captioned proceeding.

Respectfully submitted,

STEPHEN A. SANDERS

Attorney at Law

Appalachian Citizens' Law Center, Inc.

317 Main Street

Whitesburg, KY 41858

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CERTIFICATE OF SERVICE

This is to certify that on the day of January, 2010, I served by first class mail a copy of the foregoing Motion to Intervene on the following persons:

Bruce F. Clark, Esq. Stites & Harbison P. 0. Box 634 Frankfort, Kentucky 40602-0634

Dennis G. Howard, II, Esq. Assistant Attorney General 1024 Capitol Center Drive, Suite 200 Frankfort, KY 40601-8204

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