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February 3, 2010

RECEIVED

Jeff R. Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

FEB **04** 2010

PUBLIC SERVICE COMMISSION

RE: Kentucky Power Company General Rate Increase Case No. 2009-00459

Dear Mr. Derouen:

Enclosed please find the original and eleven copies of the Motion For Full Intervention in the above referenced case, which I am tendering on behalf of Community Action Kentucky, Inc. ("CAK").

Please file this motion and return a file-stamped copy to me in the enclosed postage paid envelope.

Thank you for your assistance in this matter.

Sincerely yours,

At Miles

Joe F. Childers

Enc.

Cc: Kip Bowmar

JFC/ds

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### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

FEB 0 4 2010 PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER	)	
COMPANY FOR A GENERAL ADJUSTMENT	)	CASE NO. 2009-00459
OF ELECTRIC RATES	)	

### **MOTION FOR FULL INTERVENTION**

Pursuant to KAR 5:001 Section 3(8), Community Action Kentucky, Inc. (CAK), 101 Burch Court, Frankfort, KY 40601, hereby moves for leave to intervene as a full party in the above-referenced proceeding. In support of its Motion, CAK respectfully states as follows:

1. CAK is a Kentucky non-profit, 501(c)(3) public interest corporation that works with the Commonwealth's twenty-three (23) Community Action Agencies. 

CAK operates the Low Income Home Energy Assistance Program (LIHEAP) in all 120 Kentucky counties and provides assistance to approximately 250,000 low-income households in the state each year. CAK also provides technical assistance on an on-going basis to the Demand-Side Management (DSM) Programs and Energy Assistance Programs operated by American Electric Power, Louisville Gas and Electric Company, Kentucky Utilities, and Western Kentucky Gas. These programs provide a variety of conservation and assistance services for low income households.

CAK was formerly known as Kentucky Association for Community Action, Inc. (KACA). KACA (now CAK) has intervened in many actions before this Commission on behalf of low-income customers.

- 2. By intervening in this action, CAK will present facts and concerns that will not be adequately addressed or represented by any other party. CAK's full intervention will be helpful to the Commission in fully considering the parties' respective arguments, and will not unduly complicate or disrupt this proceeding.
- 3. CAK expects to present testimony from Thomas ("Kip") Bowmar, Executive

  Director. CAK may also choose to present testimony from other witnesses not yet
  identified.
- 4. CAK therefore respectfully requests that it be granted full intervenor status in this proceeding, including the right to present exhibits and testimony; cross-examine witnesses; submit arguments; and file briefs as allowed by the Commission.

JOE F. CHILDERS

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ATTORNEY FOR COMMUNITY ACTION KENTUCKY, INC.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been served on the following persons by United States mail on this the 3<sup>rd</sup> day of February, 2010:

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COUNSEL FOR CAK

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