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# COMMONWEALTH OF KENTUCKY

SEP 09 2011

PUBLIC SERVICE COMMISSION

#### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| APPLICATION OF KENTUCKY POWER   | )                   |     |
|---------------------------------|---------------------|-----|
| COMPANY FOR COLLABORATIVE       | )                   |     |
| DEMAND-SIDE MANAGEMENT          | )                   |     |
| PROGRAMS AND FOR AUTHORITY TO   | ) CASE NO. 2011-003 | 300 |
| IMPLEMENT A TARIFF TO RECOVER   | ) .                 |     |
| COSTS AND NET LOST REVENUES AND | )                   |     |
| RECEIVE INCENTIVES ASSOCIATED   | )                   |     |
| WITH THE IMPLEMENTATION OF THE  | )                   |     |
| KENTUCKY POWER COMPANY          | )                   |     |
| COLLABORATIVE DEMAND-SIDE       | )                   |     |
| MANAGEMENT PROGRAMS             | )                   |     |

### ATTORNEY GENERAL'S MOTION TO INTERVENE

Comes now the Attorney General of the Commonwealth of Kentucky, 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 consumers' interests, hereby moves the Public Service Commission to grant him full intervenor status in this action pursuant to 807 KAR 5:001(8).

# Respectfully submitted,

JACK CONWAY

ATTORNEY GENERAL

JENNIFER BLACK-HANS
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# Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, 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:

Lila P Munsey Manager, Regulatory Services Kentucky Power 101A Enterprise Drive Frankfort, KY 40601

this \_\_\_day of September, 2011

Assistant Attorney General