



COMMONWEALTH OF KENTUCKY
OFFICE OF THE LAWRENCE COUNTY ATTORNEY

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PUBLIC SERVICE
COMMISSION

COUNTY ATTORNEY
MICHAEL T. HOGAN

122 SOUTH MAIN CROSS STREET
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June 5, 2013

Kentucky Public Service Commission
ATTN: JEFF DEROUER, EXECUTIVE DIRECTOR
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RE: CASE NO: 2012-00578
LAWRENCE COUNTY, KENTUCKY'S MOTION TO INTERVENE

Dear Mr. Derouer:

Enclosed please find the original and ten (10) copies of our Motion to Intervene in the above-styled case, for filing in your office.

Should you have any questions, or require additional information, please do not hesitate to contact me at 606 638-4051. Thank you in advance for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Denise M. Maynard".

Denise M. Maynard
Legal Assistant

/dmm
Enclosures
Cc: file

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

APPLICATION OF KENTUCKY POWER COMPANY IN
CONNECTION WITH THE TRANSFER OF AN UNDIVIDED
FIFTY PERCENT INTEREST IN THE MITCHELL GENERATING
STATION AND CERTAIN RELATED RELIEF

LAWRENCE COUNTY KENTUCKY'S MOTION TO INTERVENE
CASE NO: 2012-00578

Pursuant to KRS § 278.310 and 807 KAR 5:001 § 3(8), John A. Osborne, County Judge Executive, by and through the Lawrence County Fiscal Court, Lawrence County, Kentucky, petition the Commission for full intervention in this proceeding. Having many years of knowledge and experience which impacts Kentucky Power Company's (KPC) application for a Certificate of Public Convenience and Necessity and interests that are not adequately represented by any other party to the proceeding. Lawrence County seeks full intervention to ensure that the requested CPCN is approved only if it represents the best option to satisfy low cost energy service.

American Electric Power in Lawrence County, Kentucky has been an integral part of Lawrence County and has employed hundreds of citizens throughout the surrounding areas for over fifty (50) years. The economy of Lawrence County and the surrounding area will suffer greatly as families are forced to sell their properties and move elsewhere to establish new lives and jobs. This would also disrupt the lives of their children who attend Lawrence County schools, or other schools nearby to the Big Sandy Plant. Additionally, many truck drivers who make their living hauling coal will suddenly come to an abrupt halt.

Lastly, as families are forced to move away from Lawrence County, local businesses would suffer as well, such as restaurants, grocery stores, auto shops, to name a few.

The everyday working class citizens do not appear to factor into this scenario, as it greatly impacts the economy of Lawrence County and the hard-working people who live here.

Further, Lawrence County is uniquely situated to provide useful information to the commission. Lawrence County's intervention will not cause a delay, as the final hearing is scheduled to be heard on July 10th and Lawrence County can be prepared to go six (6) weeks.

 ORIGINAL

WHEREFORE, counsel for Lawrence County, Kentucky, hereby moves the Public Service Commission to grant him full intervener status in this action pursuant to KAR 5:001 (8).



Hon. Michael T. Hogan
Lawrence County Attorney
122 South Main Cross Street
Louisa, KY 41230
(606) 638-4051
(606) 638-3437

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed postage prepaid to the following counsel and/or parties of record:

Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

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Joe Childers, Esq.
Joe F. Childers & Associates
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201 W. Short Street
Lexington, KY 40507

On this the 5th day of June, 2013.



Hon. Michael T. Hogan
Lawrence County Attorney
122 South Main Cross Street
Louisa, KY 41230
(606) 638-4051
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