COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
An Examination Of The Application Of)	
The Fuel Adjustment Clause Of Kentucky)	
Power Company From November 1, 2012)	Case No. 2014-00450
Through October 31, 2014)	

JOINT MOTION FOR PARTIAL STAY

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Kentucky Power Company, Kentucky Industrial Utility Customers, Inc. ("KIUC"), and the Attorney General of the Commonwealth of Kentucky (collectively the "Movants") jointly move the Public Service Commission of Kentucky pursuant to 807 KAR 5:001, Section 5 for a partial stay in this case. Specifically, the Movants request that the Commission stay the portion of the case relating to the allocation of the Company's fuel costs between native load customers and off-system sales beginning January 1, 2014.

On February 5, 2015, the Commission initiated Case No. 2014-00450 to review the Company's fuel adjustment clause during the period from November 1, 2012 through October 31, 2014. KIUC and the Attorney General were granted full intervention. Among the issues in Case No. 2014-00450 is the allocation of fuel costs between native load customers and offsystem sales by the Company beginning January 1, 2014.

By separate agreements between Kentucky Power and KIUC, and Kentucky Power and the Attorney General, the Movants contingently have agreed to settle the issues relating to the allocation of fuel costs between native load customers and off-system sales beginning January 1, 2014. The settlements are contingent upon the Commission's Order in the Company's pending

rate case (Case No. 2014-00396). That order is expected to be entered after the scheduled June 2, 2015 hearing in this proceeding.

Because the Commission's order in the Company's pending rate case may resolve all issues in this case relating to the allocation of fuel costs between native load customers and offsystem sales beginning January 1, 2014, staying that portion of Case No. 2014-00450 relating to the allocation of those fuel costs until such time as the Commission's order in Case No. 2014-00396 becomes final and non-appealable will conserve the resources of the Commission and the Movants. Without the requested stay, Movants will be required to litigate an issue in Case No. 2014-00450 that may be resolved by the Commission's subsequent order in Case No. 2014-00396.

Movants seek only a stay with regard to the issues relating to the allocation of fuel costs between off-system sales and native load customers. To the extent the Commission wishes to examine other issues in Case No. 2014-00450 at the currently scheduled June 2, 2015 hearing, Movants will be prepared to proceed on all other issues identified in the case at the scheduled hearing.

WHEREFORE, Movants respectfully request the Commission enter an order staying until such time as the Commission's order in Case No. 2014-00396 becomes final and non-appealable that portion of Case No. 2014-00450 relating to the allocation of fuel costs between off-system sales and native load customers beginning January 1, 2014.

Respectfully submitted.

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