

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF KENTUCKY POWER)	
COMPANY FOR (1) A GENERAL)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC)	
SERVICE; (2) AN ORDER APPROVING ITS)	
2017 ENVIRONMENTAL COMPLIANCE PLAN;)	
(3) AN ORDER APPROVING ITS TARIFFS AND)	Case No. 2017-00179
RIDERS; (4) AN ORDER APPROVING)	
ACCOUNTING PRACTICES TO ESTABLISH)	
REGULATORY ASSETS AND LIABILITIES;)	
AND (5) AN ORDER GRANTING ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

**MOTION TO INTERVENE OF INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION 369**

Pursuant to KRS 278.310; 807 KAR 5:001, Section 4(11); and the Commission’s Order dated June 19, 2017, the International Brotherhood of Electrical Workers, Local Union 369 (“IBEW Local 369”) requests that it be granted full intervenor status in the above captioned case and states in support thereof as follows:

1. IBEW Local 369 is an unincorporated labor organization representing over 2,600 people employed in the electrical industry. Hundreds of members of IBEW Local 369 work for contractors employed by Kentucky Power. Hundreds of members also live in areas served by Kentucky Power and rely on it for electrical service as rate-payers.

2. IBEW Local 369 therefore has an interest in the safety, quality of service, and rate charged to consumers by Kentucky Power. As a representative of employees, IBEW Local 369 can directly present the interests of those employees to the Commission, an interest not represented by any other party to this case.

3. The position of IBEW Local 369 and its members cannot be adequately represented by any other party. IBEW Local 369 may present issues and develop facts based on its members' work in the electrical industry, including work performed on behalf of Kentucky Power and its contractors.

4. IBEW Local 369 will be an active participant in these proceedings and its participation will not prejudice any party.

5. The attorneys representing IBEW Local 369 and authorized to receive all pleadings and filings are:

David Leightty
Ben Basil
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Mr. Leightty and Mr. Basil are authorized to accept service of papers in this proceeding on behalf of IBEW Local 369. They and IBEW Local 369 waive any right to service of Commission orders via U.S. Mail and certify that they are capable of receiving electronic transmissions, and the electronic e-mail addresses to which all electronic notices and messages related to the above captioned action should be served are:

Basil@pcnmlaw.com
dleightty@earthlink.net

6. Counsel are aware of the Commission's Order dated July 12 and intend to be present at the hearing scheduled for July 24. The undersigned has a previously scheduled court appearance in Franklin Circuit Court on July 24 at 9:30 a.m. and will attend the Commission's hearing as soon as possible following that appearance.

Wherefore, IBEW Local 369 requests that it be granted intervenor status in the above-captioned proceeding.

Respectfully Submitted,

/s/ Ben Basil
DAVID LEIGHTTY
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CERTIFICATE OF SERVICE AND FILING

Counsel certifies that an original and six copies of this Motion were served by U.S. Mail this 14th day of July, 2017, to Dr. Talina Matthews, Executive Director, Public Service Commission, 211 Sower Blvd., Frankfort, KY 40601; furthermore, it was served on all parties of record electronically on this 14th day of July, 2017.

/s/ Ben Basil
Counsel for IBEW Local 369