

**Commonwealth of Kentucky
Before the Public Service Commission**

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR (1) A GENERAL)	Case No.
ADJUSTMENT OF ITS RATES FOR ELECTRIC)	2017-00179
SERVICE; (2) AN ORDER APPROVING ITS)	
2017 ENVIRONMENTAL COMPLIANCE PLAN;)	
(3) AN ORDER APPROVING ITS TARIFFS AND)	
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 THE
KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to K.R.S. § 278.310 and 807 K.A.R 5:001, Section 4(11), the Kentucky Cable Telecommunications Association (“KCTA”) respectfully moves the Public Service Commission to grant the KCTA full intervenor status in the above captioned action. In support of its Motion to Intervene (“Motion”), KCTA states as follows:

1. KCTA is a non-profit organization consisting of cable operators serving the majority of cable customers throughout Kentucky. KCTA’s members attach their facilities to the utility poles of Kentucky Power Company, and are directly affected by Kentucky Power Company’s Application. KCTA’s members are directly impacted by Kentucky Power Company’s proposed modifications to its pole attachment rates, terms, and conditions, including rates and terms.

2. Accordingly, KCTA’s members have a direct and substantial interest in the outcome of this proceeding. KCTA’s intervention is in lieu of the individual intervention of its affected members. Consequently, KCTA’s intervention will promote the timely and efficient

progress of this proceeding by reducing the burden on other parties and on the Commission.

KCTA's intervention also will allow the interests of KCTA's members to be represented without the burden of each member being required to retain its own counsel, participate individually in the proceedings, and make its own filings. KCTA's participation in this case is likely to present issues and develop facts that will assist the Commission in fully considering the matter.

3. The attorneys representing KCTA in this proceeding are:

Laurence J. Zielke
Janice M. Theriot
Zielke Law Firm, PLLC
1250 Meidinger Tower
462 South 4th Street
Louisville, KY 40202
(502) 589-4600

Mr. Zielke and Ms. Theriot are authorized to accept service of papers in this proceeding on behalf of KCTA. They and the KCTA waive any right to service of Commission order via U.S. Mail and certify that (a) they and the KCTA are capable of receiving electronic transmissions; and (b) the electronic email addresses to which all electronic notices and messages related to the above-captioned action should be served are:

lzielke@zielkefirm.com
jtheriot@zielkefirm.com

WHEREFORE, KCTA respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

By /s/ Laurence J. Zielke

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**ATTORNEYS FOR THE KENTUCKY CABLE
TELECOMMUNICATIONS ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing Kentucky Cable Telecommunications Association's Motion to Intervene has been served on all parties of record electronically on this the 10th day of July 2014.

/s/ Janice M. Theriot
Janice M. Theriot