## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY ) POWER COMPANY FOR A CERTIFICATE OF ) PUBLIC CONVENIENCE AND NECESSITY TO ) PERFORM UPGRADE, REPLACEMENT, AND ) INSTALLATION WORK AT ITS EXISTING ) SUBSTATION FACILITIES IN PERRY AND ) LESLIE COUNTIES, KENTUCKY )

CASE NO. 2019-00154

## 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 moves the Commission to grant him intervention in the instant proceeding. KRS 367.150 (8) provides the Attorney General the power and duty to appear before regulatory bodies of the Commonwealth of Kentucky, and to be made a real party in interest, in order to represent and be heard on behalf of consumers' interests, "whenever deemed necessary and advisable . . . by the Attorney General." The Attorney General has determined that it is in the consumers' interest for him to be made a real party in interest in this matter, and hereby moves the Kentucky Public Service Commission to grant him full intervenor status in this action.

Respectfully submitted,

ANDY BESHEAR ATTORNEY GENERAL

stra N. c

JUSTIN M. McNEIL KENT A. CHANDLER LAWRENCE W. COOK REBECCA W. GOODMAN ASSISTANT ATTORNEYS GENERAL 700 CAPITOL AVE, SUITE 20 FRANKFORT, KY40601-8204 PHONE: (502) 696-5453 FAX: (502) 573-1005 Justin.McNeil@ky.gov Kent.Chandler@ky.gov Larry.Cook@ky.gov Rebecca.Goodman@ky.gov