

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

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JUN 29 2011  
PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

**THE 2011 JOINT INTEGRATED )  
RESOURCE PLAN OF LOUISVILLE GAS )     **CASE NO. 2011-00140**  
AND ELECTRIC COMPANY AND )  
KENTUCKY UTILITIES COMPANY )**

**RICK CLEWETT, DREW FOLEY, JANET OVERMAN, GREGG WAGNER,  
THE NATURAL RESOURCES DEFENSE COUNSEL, AND  
THE SIERRA CLUB FORMAL REQUEST THAT THE COMMISSION RULE ON ITS  
MOTION FOR FULL INTERVENTION**

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On May 26, 2011, the Commission docketed the motion for fully intervention submitted by Rick Clewett, Drew Foley, Janet Overman, Gregg Wagner the Natural Resources Defense Counsel, and the Sierra Club (collectively the “Movants”). On June 3, 2011, Louisville Gas & Electric and Kentucky Utilities Company (collectively, “Companies”) filed a response opposing Movants’ motion. In their response, the Companies noted that they would “not begin working on responses” to Movants’ timely filed discovery until Movants are granted intervention, even though the deadline for responses was June 13 and supplemental discovery requests are due by June 29. On June 16, 2011, Movants filed a reply brief detailing why it was proper for the Commission to grant them full intervention. Movants’ pleadings properly and fully demonstrated with specificity how Movants would assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings. Likewise, Movants made clear no other party to the proceeding could or would adequately represent their interests in this proceeding.

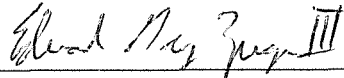
Movants’ intervention motion has now been pending before the Commission for 33 days, even as the proceeding moves ahead without Movants having the opportunity to fully participate.

Until party status is granted, the Companies will not respond to Movants' timely filed discovery, Movants are not privy to confidential information and the data already exchanged between parties, and thus cannot begin preparing their case. Since Movants' written comments on the 2011 Joint Integrated Resource Plan would be due by July 28, 2011, it is imperative that the Commission rule on the motion as delay is unjustifiably prejudicing Movants' ability to fully participate; a prejudice and burden not placed on any other intervenor to date.

THEREFORE, Movants request that the Commission grant their motion for full intervention as expeditiously as possible.

Dated: June 28, 2011

Respectfully submitted,



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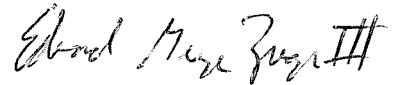
**CERTIFICATE OF SERVICE**

I certify that I mailed a copy of this FORMAL REQUEST THAT THE COMMISSION RULE ON ITS MOTION FOR FULL INTERVENTION by first class mail on June 28, 2011 on the following:

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