

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

JOINT APPLICATION OF THE ILLINOIS)
MUNICIPAL ELECTRIC AGENCY AND THE)
INDIANA MUNICIPAL POWER AGENCY FOR)
APPROVAL TO BE A 25% PARTNER IN THE)
CONSTRUCTION OF A 750 MEGAWATT) **CASE NO: 2005-00152**
ADDITION TO THE EXISTING TRIMBLE)
COUNTY GENERATING STATION IN)
TRIMBLE COUNTY, KENTUCKY)

DATA REQUESTS OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY
TO IBEW AND TRADES COUNCIL

Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively the “Companies”) respectfully submit the following data requests to Intervenor, International Brotherhood of Electrical Workers, Local 2100 (“IBEW”) and the Greater Louisville Building and Construction Trades Council (“Trades Council”) to be answered by the date specified in the Board’s Notice of Procedural Schedule herein.

Instructions

As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to IBEW and/or the Trades Council, their witnesses or their counsel.

1. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

2. These requests shall be deemed continuing so as to require further and supplemental responses if IBEW and/or the Trades Council receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.
3. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.
4. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.
5. If IBEW and/or the Trades Council has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.
6. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.
7. In the event any document requested has been destroyed or transferred beyond the control of IBEW and/or the Trades Council, or any of their witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or

transferred by reason of a document retention policy, describe in detail the document retention policy.

8. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.
9. "TC2" means the proposed new generating unit in Trimble County, Kentucky which is the subject of this proceeding and Case No. 2004-00507 pending before the Kentucky Public Service Commission.

Data Requests

1. With regard to each utility construction project in Kentucky in which the IBEW or Trades Council, or any of their members or affiliates, have been involved in the last ten (10) years:
 - a. provide the estimated or budgeted project labor rates without a project labor agreement ("PLA") and the actual costs with the PLA; and
 - b. list the number of Kentucky workers and the number of non-Kentucky workers utilized or employed.
2. Will the IBEW, Trades Council or their members or affiliates prohibit or in any way discourage Kentucky union workers from being directly hired by a selected Engineering Procurement and Construction ("EPC") bidder for TC2 if no PLA is entered into? If not, explain in detail why not?
3. Will the IBEW, Trades Council or their members or affiliates encourage Kentucky union workers to seek direct hiring by a successful EPC bidder for TC2 if no PLA is entered into?

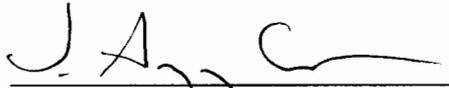
4. In the event no PLA is entered in connection with the TC2 project, and in the further event that any Kentucky union worker performs any work on the construction of TC2, will the IBEW, State Trades Council or their members or affiliates take any corrective action against, or in way seek to penalize or punish, such union worker? Explain your answer in detail.
5. Has any study or analysis of any kind been performed, sought or commissioned by the IBEW or Trades Council, or any of their members or affiliates, in any way relating to or connected with the subject matter of this proceeding or the proposed construction of TC2?
 - a. If such a study or analysis has been performed, sought or commissioned, please provide a copy of such study or analysis and any and all documents relating to same.
6. Identify by name, business address and current employer each person who will offer or provide testimony on behalf of the IBEW or Trades Council in this proceeding.
 - a. Produce a copy of a current CV, resume or statement of qualifications containing the complete educational and professional background for each such witness.
 - b. Produce a copy of each and every publication or document referred to or in any way relied upon by each such witness in his or her direct testimony.
7. Is it the position of the IBEW or Trades Council that LG&E and KU should not consider the relative cost of labor in deciding whether or not to enter into a PLA?

Describe that position in detail, including any references to legal support for said position.

- a. Do the IBEW and Trades Council have the same position with regard to the decision by the successful EPC bidder concerning whether or not to enter into a PLA? Describe your response in detail.

Dated: August 29, 2005

Respectfully submitted,



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Counsel for Louisville Gas and Electric
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Data Requests were served on the following persons on the 29th day of August 2005, U.S. mail, postage prepaid:

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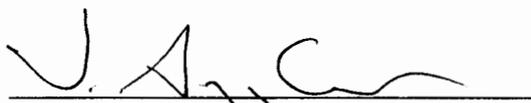
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