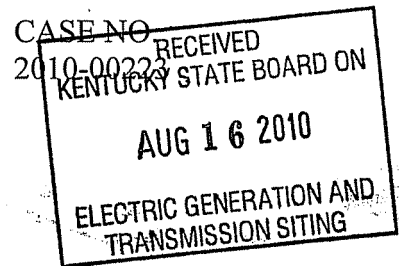


COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON  
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

APPLICATION OF SOUTHERN INDIANA )  
GAS & ELECTRIC CO., D/B/A VECTREN )  
ENERGY DELIVERY OF INDIANA, INC. )  
FOR A CONSTRUCTION CERTIFICATE TO )  
CONSTRUCT AN ELECTRIC TRANSMISSION )  
LINE FROM ITS A.B. BROWN PLANT TO THE )  
BIG RIVERS EHV STATION )



**MOTION OF CITY OF HENDERSON, KENTUCKY**  
**FOR FULL INTERVENTION AND REQUESTS FOR PUBLIC**  
**HEARING AND FULL EVIDENTIARY HEARING**

Comes the City of Henderson (hereinafter referred to as “City”), by counsel, and moves the Kentucky State Board on Electric Generation and Transmission Siting (hereinafter “Siting Board”), pursuant to KRS Chapter 278 and 807 KAR 5:110 and all other applicable law, to intervene in the above styled proceeding as a full party, with all rights and privileges of a full intervenor. In support thereof, the City states as follows:

1. That the City is a municipality duly organized and existing under the laws of the Commonwealth of Kentucky and situated in Henderson County, Kentucky. The City owns and maintains property within the County of Henderson, Kentucky.

2. On July 15, 2010, Southern Indiana Gas & Electric Co., d/b/a Vectren Energy Delivery of Indiana, Inc. (“Vectren”) filed an “Application for Certificate to Construct Nonregulated Electric Transmission Line” with the Siting Board. The Application seeks approval to site and construct a 345 kV electric transmission line.

3. That the proposed route for the Vectren line and its subsequent operation will directly and adversely affect property owned and maintained by the City.

4. That the proposed route of the Vectren line will adversely affect the City and will have a significant adverse impact upon scenic, historic, aesthetic and perhaps archeological assets and property of the City and Commonwealth.

5. That because of its status as a City within Henderson County, Kentucky, and the adverse impacts which will occur to both its facilities and property, the City has a special and unique interest in this proceeding and moves the Siting Board to grant it status as a full party intervenor.

6. That the City is an interested person pursuant to KRS 278.712 and has a special interest pursuant to 807 KAR 5:110 entitling it to full intervention in this proceeding.

7. That the special interest of the City is not otherwise adequately represented by any other intervenors or the applicant.

8. That the line as proposed will significantly degrade scenic assets of the Commonwealth and that its construction as proposed will be in violation of applicable law.

9. That the Applicant does not have nor can it obtain, the necessary rights of way to construct the line as proposed.

10. That full intervention by the City will assist the Siting Board in reaching

its decision, and will not unduly interrupt the proceeding.

11. That the attorneys for the City authorized to represent it in this proceeding and to take service of all documents are:

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250 West Main Street, Suite 1600  
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12. That the Siting Board is hereby requested to hold a public hearing in Henderson County, Kentucky to provide a forum for all interested persons to comment and advise the Siting Board on issues relating to the Application herein.

13. That the Siting Board is hereby requested to hold a full, formal, evidentiary hearing on the application herein; including an opportunity for parties to tender evidence, cross examine witnesses and exercise the rights of due process of law afforded to all interested parties.

**WHEREFORE**, the City of Henderson moves that an order be entered in this proceeding granting it full intervenor status; that the Siting Board order a public hearing be held in Henderson County, Kentucky on the Application herein; that a full evidentiary

hearing be held on the Application herein; and for any and all other relief to which the City may be reasonably entitled including its costs and attorneys' fees herein expended.

So moved this the 16<sup>th</sup> day of August, 2010.

By: 

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*Counsel for City of Henderson*

**CERTIFICATE OF SERVICE**

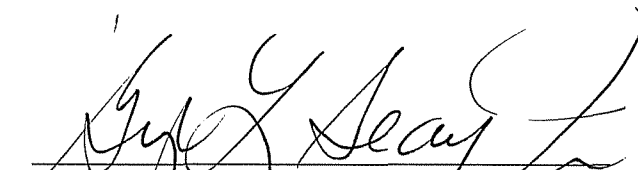
This is to certify that the original and ten true and correct copies of the foregoing has been served upon the following, by hand delivery, at the filing office of the Kentucky Public Service Commission, on this the 16<sup>th</sup> day of August, 2010:

Hon. Helen Helton  
General Counsel  
Public Service Commission  
211 Sower Blvd  
P.O. Box 615  
Frankfort, KY 40602-0615

Mr. Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

and via U.S. Mail, postage prepaid to:

Jason R. Bentley, Esq  
McBRAYER, McGINNIS, LESLIE & KIRKLAND, PLLC  
201 East Main Street, Suite 1000  
Lexington, KY 40507

  
George L. Seay, Jr.  
Counsel for City of Henderson