

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

MAR 13 2005

JOINT APPLICATION OF LOUISVILLE GAS )  
AND ELECTRIC COMPANY AND KENTUCKY )  
UTILITIES COMPANY FOR A CERTIFICATE )  
OF PUBLIC CONVENIENCE AND NECESSITY, )  
AND A SITE COMPATIBILITY CERTIFICATE, )  
FOR THE EXPANSION OF THE TRIMBLE )  
COUNTY GENERATING STATION )

PUBLIC SERVICE  
COMMISSION

CASE NO.: 2004-00507

FIRST DATA REQUEST OF INTERVENORS  
IBEW, LOCAL 2100 AND  
GREATER LOUISVILLE BUILDING  
AND CONSTRUCTION TRADES COUNCIL

Come the Intervenors, International Brotherhood of Electrical Workers, Local 2100 (IBEW) and the Greater Louisville Building and Construction Trades Council (Trades Council), and propound the following requests for information to LG&E:

1. Produce a copy of the RFP that LG&E is utilizing in the solicitation of bids from pre-qualified EPC's, as referred to by the Voyles testimony, p. 10.
2. Produce all other documents supplied to, or otherwise made available by LG&E, to EPC bidders related to labor market conditions, wage rates, benefit rates, craft availability, employment trends or any other information for the assessment and projection of labor costs for TC2.
3. With reference to the Burns & McDonald report, *Trimble County Unit 2 Project Approach, Volume 1 Execution Plan*, explain why the labor market analysis performed under Section 4.5 did not include review of labor and craft employee availability from the Paducah, Owensboro and Lexington, Kentucky areas?
4. With reference to the Burns & McDonald report, *Trimble County Unit 2 Project Approach, Volume 1 Execution Plan*, how many of the non-union electricians, identified in Table 4-3, are construction electricians, and how many are residential?

5. With reference to the Burns & McDonald report, *Trimble County Unit 2 Project Approach, Volume 1 Execution Plan*, the report concludes that “both union and non-union craft are very busy” (4-21) and “labor halls do not have many craft on the bench.” (4-22) With regard to these conclusions, (1) has any effort been made by the Company to update employment conditions since the statistics were gathered in 2001-2002, and (2) from the Company’s knowledge of the local labor market and prevailing economic conditions, does it consider that the report’s assessment of labor utilization accurately reflects 2005 employment trends?

6. With reference to the Burns & McDonald report, *Trimble County Unit 2 Project Approach, Volume 1 Execution Plan*, the table at 4-3 does not indicate a value for fringe benefits for any non-union craft employees. Is it LG&E’s position that the EPC may avoid paying health care coverage costs for employees as a method of reducing labor costs for the construction of TC2?

7. What requirements, if any, were imposed upon EPC contractors to prefer or utilize Kentucky workers in the construction and installation of SCR’s at the Ghent and Mill Creek plants?

8. Will LG&E include a requirement that the EPC for TC2 will utilize Kentucky employees exclusively unless it can certify that efforts to recruit and retain a sufficient labor force, including skilled crafts, have failed to staff the project according to the manpower needs and timetables specified? If LG&E does oppose the imposition of such a criteria on the EPC, identify issues other than employee availability that form the basis for the Company’s position.

9. With reference to the Burns & McDonald report, *Trimble County Unit 2 Project Approach, Volume 1 Execution Plan*, the report concludes “Cost estimate values are based on a merit-shop approach”. (4-22) What assumption was made about the percentage of work to be performed “based upon a merit-shop approach” with regard to the cost estimate values for labor?

10. With reference to the Burns & McDonald report, *Trimble County Unit 2 Project Approach, Volume 1 Execution Plan*, the report concludes that the location of the project in the

Ohio Valley is a plus for drawing from a pool of skilled employees to handle “specialty type craft” work. (4-22) From the Company’s experience in the SCR work at Mill Creek and Ghent, is LG&E in possession of any data that would indicate an inadequate pool of skilled employees sufficient to meet the manpower needs for construction of TC2? If so, produce the data.

11. What percentage of the workforce, employed by the EPC on the Mill Creek SCR project, came from outside the Commonwealth?

12. What percentage of the workforce, employed by the EPC on the Ghent Plant SCR projects, came from outside the Commonwealth?

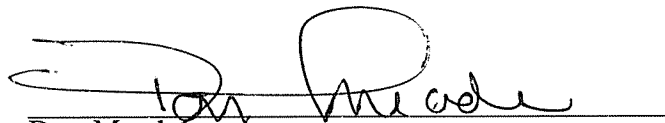
13. Is it LG&E’s position that it would violate its fiduciary duty to rate payers by requiring the EPC to provide medical insurance fringe benefits to employees who work on the construction phase of the project? Please explain the rationale for the Company’s response.

14. Is it LG&E’s position that it would be violating its fiduciary duties to the rate payers by insisting upon the utilization of a workforce drawn exclusively from Kentucky, unless insufficient employees and skills were available to keep the project on schedule? Please explain the rationale for the Company’s response.

15. Is it LG&E’s position that an EPC should have the authority to utilize out of state employees if doing so allows TC2 to be built more economically than if Kentucky employees are preferred or required? Please explain the rationale for the Company’s response.

Respectfully submitted,

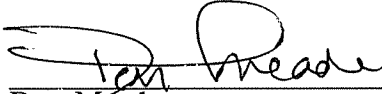
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**CERTIFICATE OF SERVICE**

It is hereby certified that on the 17 day of March, 2005, an original and 10 copies of the foregoing motion was mailed to the Public Service Commission, P. O. Box 615, 211 Sower Blvd., Frankfort, KY 40602-0615, and a true copy thereof was mailed to the attached service list.

  
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Don Meade

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing pleading was served via U.S. mail, first-class postage prepaid, this 17 day of March, 2005, upon the following persons:

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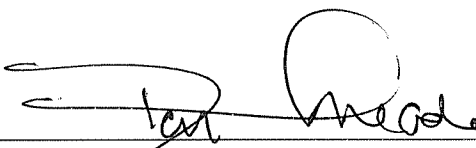
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