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April 28, 2005

Hon. Beth A. O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40601

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APR 28 2005

PUBLIC SERVICE  
COMMISSION

Re: Louisville Gas and Electric Company  
Kentucky Utilities Company  
Case No. 2004-00507

Dear Ms. O'Donnell:

We enclose for filing an original and ten copies of the Motion of Louisville Gas and Electric Company and Kentucky Utilities Company to Strike the Direct Testimony of Larry L. Roberts in the above-captioned case. Best regards.

Sincerely,



Robert M. Watt, III

Rmw  
Encl.  
Cc: Mr. John Wolfram (w/encl.)  
Counsel of Record (w/encl.)

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

**In the Matter of:**

**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 )**

**CASE NO.  
2004-00507**

**RECEIVED**

**APR 28 2005**

**PUBLIC SERVICE  
COMMISSION**

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**LOUISVILLE GAS AND ELECTRIC COMPANY'S  
AND KENTUCKY UTILITIES COMPANY'S MOTION TO  
STRIKE DIRECT TESTIMONY OF LARRY L. ROBERTS**

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Louisville Gas and Electric Company and Kentucky Utilities Company (collectively, the "Companies") respectfully submit this Motion to Strike the Direct Testimony of Larry L. Roberts because it addresses issues which the Commission has ruled are beyond the scope of this case.

On February 21, 2005, the International Brotherhood of Electrical Workers, Local 2100 ("IBEW"), and the Greater Louisville Building and Construction Trades Council ("Trades Council") moved for full intervenor status in this case. By Order of March 4, 2005, the Commission noted that this case involves an application for a Certificate of Public Convenience and Necessity under KRS § 278.020 and an application for a Site Compatibility Certificate under KRS § 278.216. (March 4, 2005 Order, p. 2). In light of that fact, the Commission ruled that this case is not the correct forum to raise issues such as cost of labor, local investment and the Commonwealth's business and employment well-being. (March 4, 2005 Order, p. 2). Accordingly, although the Commission granted full intervenor status to the IBEW and the Trades

Council, it did so with the caveat that they limit the issues they address to issues properly before the Commission in this case. The IBEW and the Trades Council moved for reconsideration of that limitation, but their motion was denied by Order of April 19, 2005.

In filing the Direct Testimony of Larry L. Roberts, the IBEW and the Trades Council have addressed the very issues that the Commission has held are not to be addressed in this case. For example, Mr. Roberts offers an answer to the question, "How does a project like Trimble County 2 impact the ability of Kentucky to sustain the development of a qualified workforce?" This question and others call for answers that squarely address the exact issues the Commission has deemed to be outside the scope of this case. Therefore, the Companies respectfully request the Commission strike the testimony of Mr. Roberts.

Dated: April 28, 2005

Respectfully submitted,

*Robert Watt*

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Counsel for Louisville Gas and Electric  
Company and Kentucky Utilities Company

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Motion to Strike was served on the following persons on the 28th day of April, 2005, U.S. mail, postage prepaid:

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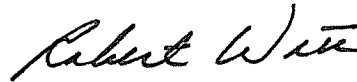
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