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June 3, 2005

Ms. Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RECEIVED

JUN 03 2005

PUBLIC SERVICE
COMMISSION

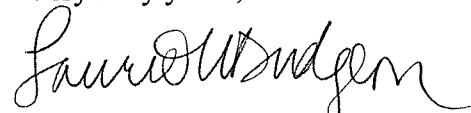
RE: *Application of Kentucky Utilities Company for Certificate of Public Convenience and Necessity for the Construction of Transmission Facilities in Franklin, Woodford and Anderson Counties, Kentucky - Case No. 2005-00154*

Dear Ms. O'Donnell:

Enclosed please find an original and ten (10) copies of a Motion to Intervene and Request for Public Hearing filed in the above-referenced matter on behalf of the Concerned Citizens Against the Power Line Extension. This group is an unincorporated association comprised of 29 members, all receiving notice from Kentucky Utilities that their property will be impacted by the proposed construction of the above electric transmission line.

If you have any questions regarding the enclosed, please feel free to contact me.

Very truly yours,



Laurie K. Dudgeon

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 03 2005

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

APPLICATION OF KENTUCKY UTILITIES COMPANIES
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND
NECESSITY FOR THE CONSTRUCTION OF TRANSMISSION
FACILITIES IN FRANKLIN, WOODFORD AND ANDERSON
COUNTIES, KENTUCKY

CASE No.
2005-00154

**CONCERNED CITIZENS AGAINST POWER LINE EXTENSION
MOTION TO INTERVENE AND REQUEST FOR A PUBLIC HEARING**

COME the Concerned Citizens Against the Power Line Extension (“Citizens”)¹, by counsel, and move this commission to grant full intervenor status in the above referenced matter, pursuant to 807 KAR 5:001, Section 3(8) and request for a public hearing. In support hereof, the Citizens state as follows:

This case concerns the proposed construction by Kentucky Utilities Company (“KU”) of a 138,000 volt electric transmission line from KU’s West Frankfort substation in Franklin County to KU’s Tyrone generating station in Woodford County. KU notified affected property

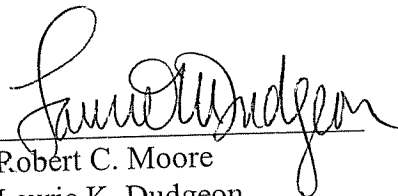
¹The Citizens group is an unincorporated association comprised of the following 28 members, who have all received notice from Kentucky Utilities of the Proposed Construction of an electric transmission line that will cross their property located in Anderson County and Franklin County, Kentucky. Together, they have formed the Concerned Citizens Against Power Line Extension Group, and are identified as follows: Thomas H. Smith, Clyde H. Smith, Fred Bradley, Harold Darnaby, Philip Case, Gary Thornton, Mike Brewer, Michael D. Green, Dennis Monohan, Pat Monohan, David Mountjoy, June Mountjoy, Jerry Hughes, Lisa Hughes, James R. “Buddy” Smith, Bruce Hall, Harold Hall, Hobart C. Hearn, Kevin M. Smith, Catherine Smith, Ronald Dempsey, Patty Dempsey, Larry Smith, Wayne Morris, Emily Shaw, Lyle Shaw, Jim Green, David Green, Faye Green, and Highpoint Construction, LLC.

owners of the proposed construction of the electric transmission line on May 9, 2005. KU's application for a Certificate of Public Convenience and Necessity for the Construction of Transmission Facilities in Franklin, Woodford and Anderson Counties, Kentucky was filed with the Public Service Commission on May 11, 2005.

As these Citizens own property that will be directly impacted by construction of this transmission line they have a special and unique interest in this proceeding which is otherwise not adequately represented. None of the current parties to this proceeding own real property that will be taken or directly impacted by the proposed power line, as well as the easement for the proposed power line. Allowing their intervention is likely to ensure the complete development of issues and facts which will assist the Commission in fully considering alternate routes for the construction of the transmission line without unduly complicating or disrupting the proceedings.

Wherefore, the Citizens request they be granted full intervenor status in the above-styled matter and that a formal Public Hearing on this matter be scheduled.

Respectfully submitted,



Robert C. Moore
Laurie K. Dudgeon
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Attorneys for Concerned Citizens
Against Power Line Extension

CERTIFICATE OF SERVICE AND FILING

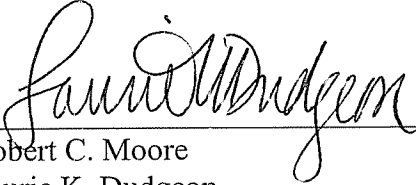
Undersigned counsel certifies that an original and ten photocopies of this Motion to Intervene were served and filed by hand delivery upon Elizabeth O'Donnell, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct copy of the same, first class postage prepaid to the following counsel for Kentucky Utilities Company, by first class mail, postage prepaid, as follows:

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All on this the 3rd day of June, 2005.



Robert C. Moore
Laurie K. Dudgeon