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R. DOUGLAS BURCHETT

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SEP 5 2 2003  
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EMAIL DBURCHET@BHDLAWKY.COM  
PUBLIC SERVICE  
COMMISSION

August 28, 2003

Thomas M. Dorman, Esq.  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

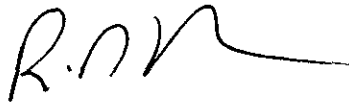
**Re: Petition to Intervene in Case No. 2003-00266**

Dear Mr. Dorman:

Please find enclosed the original of the Petition to Intervene of Thoroughbred Generating Company to be filed in the above-referenced matter. In addition, eleven copies of the petition are also enclosed of which ten are to be furnished to the Commission pursuant to KAR 5:001, Section 4(10). Please file-stamp the remaining copy and return to me in the enclosed, postage-stamped, self-addressed envelope.

By copy of this letter, all parties listed on the attached Certificate of Service have been served. Please place this document on file.

Sincerely,



R. Douglas Burchett

HAPEABODY\Kypsc\_00266\Correspondence\kypsc.1.wpd  
Enclosure

cc: Certificate of Service  
Richard Raff, Esq.  
Winfrey P. Blackburn, Jr., Esq.

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

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PUBLIC SERVICE  
COMMISSION

In the matter of:

INVESTIGATION INTO THE MEMBERSHIP OF )  
LOUISVILLE GAS AND ELECTRONIC COMPANY )  
AND KENTUCKY UTILITIES COMPANY IN THE )  
MIDWEST INDEPENDENT TRANSMISSION )  
SYSTEM OPERATOR, INC. )

CASE NO. 2003-00266

PETITION TO INTERVENE OF  
THOROUGHBRED GENERATING COMPANY

Pursuant to 807 KAR 5:001, Section 3(8), Thoroughbred Generating Company LLC (“Petitioner”), requests that it be granted full intervenor status in this proceeding. In support thereof, Petitioner states as follows:

1. Petitioner is an independent power producer that is constructing an electric generating station in Muhlenberg County, Kentucky. The Thoroughbred generating station will be a 1500 MW coal-fired power plant with coal supplied from the adjacent underground mine. Thoroughbred will provide reliable, low-cost electricity for 1.5 million homes in a manner that is environmentally sound. The plant is modeled at a dispatch position that is ahead of all of the region’s coal and gas plants and below some nuclear plants. This means Thoroughbred will benefit Kentuckians by continuing to help keep energy prices low. Both the mine and power plant will be owned by the petitioner and/or affiliates of the petitioner. The generating station will be interconnected with the Big Rivers Electric Corporation and Tennessee Valley Authority transmission systems, with potential impact to the Louisville Gas & Electric Energy and Owensboro Municipal Utilities transmission systems.

2. Petitioner has a special interest in this proceeding which is not otherwise adequately



represented by any existing party. Petitioner is an independent power producer proposing a Kentucky generating station of significant size with interconnections to portions of Kentucky's transmission system. Obviously, the Thoroughbred station's size and its use of coal for fuel will provide the diversity of new generating units which will be added to Kentucky's energy portfolio. As a large Western Kentucky coal producer, Thoroughbred's operations and its employees will be very dependent on the ability/inability of the transmission system to move power produced from Kentucky coal to the adjoining states. In Thoroughbred's opinion, the participation of LGE/KU in a larger regional transmission organization may reduce the pancaking of transmission rates and should provide helpful transmission studies that quantify the value of new transmission (and who benefits from this transmission). In short, these benefits will be critical to maintaining or expanding coal production in Western Kentucky. In addition, Thoroughbred is expected to accelerate economic growth in the region, creating more than 450 permanent jobs and employing up to 2,500 workers during a four-year construction process. This compares to a similar sized natural gas combined cycle plant, which creates approximately 50 full-time jobs and 500 construction jobs at peak periods over a two-year construction cycle. Once operational, the station could annually inject nearly \$100 million in annual economic benefits or more than \$3.35 billion during the life of the project. Additional benefits of clean coal-based generation would include the likely spill-over of jobs to other industries such as wallboard plants, which use the gypsum created from the byproducts of a new coal-fired power plant.

3. Petitioner's full intervention will not unduly complicate or disrupt the proceedings.
4. The representative for Petitioner authorized to receive service of documents filed

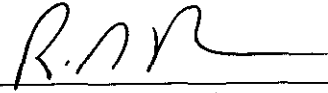
herein is:



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Louisville, Kentucky 40202

WHEREFORE, Thoroughbred Generating Company LLC respectfully requests that it be granted full Intervenor status in this proceeding.

Respectfully submitted,



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*Counsel for Petitioner*

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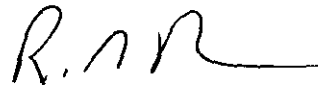
**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was mailed on this 28<sup>th</sup> day of August, 2003, to the following:

Michael S. Beer  
Vice President, Rates & Regulatory  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

Honorable Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Utility & Rate Intervention Division  
1024 Capital Center Drive  
Suite 200  
Frankfort, KY 40601-8204

Honorable Michael L. Kurtz  
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Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 2110  
Cincinnati, OH 45202



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R. Douglas Burchett

