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PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATIONS OF BIG RIVERS ELECTRIC)
CORPORATION, E.ON U.S., LLC, WESTERN)
KENTUCKY ENERGY CORP., AND LG&E)
ENERGY MARKETING, INC. FOR APPROVAL)
OF TRANSACTIONS; AND APPLICATION OF)
BIG RIVERS ELECTRIC CORPORATION FOR)
APPROVAL OF WHOLESALE TARIFF)
ADDITIONS; AND APPROVAL TO ISSUE)
EVIDENCES OF INDEBTEDNESS)

IBEW PRO SE MOTION TO INTERVENE

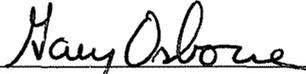
Comes the International Brotherhood of Electrical Workers, Local Union 1701, by and through its President, Gary Osborne, and moves the Commission for an order granting full intervenor status. As grounds for the motion, IBEW has labor contracts with both Western Kentucky Energy, where it represents approximately 325 production and maintenance employees and with Big Rivers, where it represents a unit of approximately 24 transmission maintenance employees. The proposed transaction may potentially have an impact on the continuation of labor agreements, the terms and conditions of employment of both bargaining units.

IBEW seeks full intervenor status so that it may review the positions of Big Rivers and Western Kentucky Energy relative to its labor agreements, future staffing plans, plans for any reductions in force or any other information that may impact on the present conditions or future opportunities of its union employees. IBEW wishes to receive all filings, data requests, motions and other information as a full intervenor. IBEW does not, at this time, intend to participate in the discovery phases of the case except to receive and evaluate the information.

For all these reasons, IBEW seeks full intervenor status according to 807 KAR 5:001(8)(b).

Respectfully submitted,

International Brotherhood of Electrical Workers
Local Union 1701
2911 W. Parrish Avenue
Owensboro, KY 42301
(270) 684-3058



Gary Osborne, President

CERTIFICATE OF SERVICE AND FILING

I certify that an original and ten copies of this Motion to Intervene were served and filed with Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Blvd., Frankfort, KY 40601 by mailing same to her this 13th day of February, 2008. I further certify that true and accurate copies of the foregoing were mailed the same day via First Class U.S. Mail, postage pre-paid, to:

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