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July 9, 2012

Jeff DeRouen, Executive Director  
Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

RECEIVED

JUL 03 2012

PUBLIC SERVICE  
COMMISSION

**Re: Application of Louisville Gas and Electric Company for an Adjustment of Its  
Electric and Gas Rates, a Certificate of Public Convenience and Necessity,  
Approval of Ownership of Gas Service Lines and Risers, and a Gas Line  
Surcharge  
Case No. 2012-00222**

Dear Mr. DeRouen:

Please find enclosed for filing an original and 10 copies of IBEW, Local 2100's Motion to Intervene in the above-referenced matter.

Respectfully,

*Don Meade* /ss  
Don Meade

DM/sks  
Enclosure

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

**In the Matter of:**

**Application of Louisville Gas and Electric Company )  
For An Adjustment of its Electric and Gas Rates, a )  
Certificate Of Public Convenience And Necessity, )  
Approval Of Ownership Of Gas Service Lines and )  
Risers, and a Gas Line Surcharge, )**

Case No. 2012-00222

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**JUL 03 2012**

**MOTION TO INTERVENE  
BY IBEW, LOCAL 2100**

**PUBLIC SERVICE  
COMMISSION**

Comes the International Brotherhood of Electrical Workers, Local 2100, the collective bargaining representative of hourly production, maintenance and technical workers at Louisville Gas & Electric Company, and moves for full intervenor status in this action pursuant to 807 KAR 5:001(8). As grounds for the Motion, the 750 employees represented by Local 2100 share common interests with the public and other parties in safety and the quality of service provided by LG&E. The Union brings to the proceeding particular expertise arising from actual involvement in all operational aspects of the utility and can make a valuable contribution to the understanding, clarification and development of issues that fall within the Commission's regulatory authority.

The IBEW has historically been granted full intervenor status in significant PCS cases involving LG&E, and has participated in the discovery and hearing processes of those cases. In particular, the IBEW participated in all phases of LG&E's Joint Application of LG&E and KU for Approval of Merger, Case 97-300; the subsequent consolidated rate cases 98-426 and 98-474, and subsequent proceedings regarding the sale of LG&E to PowerGen, the acquisition of PowerGen and LG&E by German owned E.on (Case No. 2001-104), and the Certificate of

Need (2004-00507) and Siting Board cases involving Trimble County II, and the Acquisition of Ownership and Control case involving PPL (Case No. 2010-00204).

The Union seeks full intervenor status with the intention of being an active participant in the hearings, including the submission of expert testimony, if appropriate.

Respectfully submitted,

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By   
Don Meade

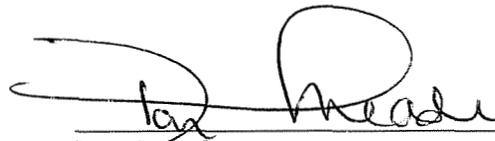
**CERTIFICATE OF SERVICE AND FILING**

Counsel certifies that an original and ten copies of this Motion to Intervene were served by mailing same this 2<sup>nd</sup> day of July, 2012, to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Blvd., Frankfort, KY 40601; furthermore, it was served by mailing a true and correct copy of same, first class postage prepaid, to:

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