

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of:

THE APPLICATION OF THOROUGHbred)	
GENERATING COMPANY, LLC FOR A MERCHANT)	CASE NO.
POWER PLANT CONSTRUCTION CERTIFICATE)	2002-00150
IN MUHLENBERG COUNTY, KY)	

MOTION OF
LOUISVILLE GAS AND ELECTRIC COMPANY,
KENTUCKY UTILITIES COMPANY, AND
WESTERN KENTUCKY ENERGY CORPORATION
FOR FULL INTERVENTION

Pursuant to KRS 278.702(3) and 807 KAR 5:110, Section 4, Louisville Gas and Electric Company ("LG&E"), Kentucky Utilities Company ("KU"), and Western Kentucky Energy Corporation ("WKE") respectfully request that they be granted full intervenor status in the above-captioned proceeding and state in support thereof as follows:

1. LG&E is a utility engaged in the electric and gas business. LG&E generates and purchases electricity, and distributes and sells electricity at retail in Jefferson County and portions of Bullitt, Hardin, Henry, Meade, Oldham, Shelby, Spencer and Trimble Counties. LG&E also purchases, stores and transports natural gas and distributes and sells natural gas at retail in Jefferson County and portions of Barren, Bullitt, Green, Hardin, Hart, Henry, Larue, Marion, Meade, Metcalfe, Nelson, Oldham, Shelby, Trimble and Washington Counties.

2. KU is a utility engaged in generating, transmitting and distributing electric service in communities and rural areas, including those communities listed below, in the following counties in Central, Northern, Southeastern and Western Kentucky:

Adair	Edmonson	Jessamine	Ohio
Anderson	Estill	Knox	Oldham
Ballard	Fayette	Larue	Owen
Barren	Fleming	Laurel	Pendleton
Bath	Franklin	Lee	Pulaski
Bell	Fulton	Lincoln	Robertson
Bourbon	Gallatin	Livingston	Rockcastle
Boyle	Gerrard	Lyon	Rowan
Bracken	Grant	Madison	Russell
Bullitt	Grayson	Marion	Scott
Caldwell	Green	Mason	Shelby
Campbell	Hardin	McCracken	Spencer
Carlisle	Harlan	McCreary	Taylor
Carroll	Harrison	McLean	Trimble
Casey	Hart	Mercer	Union
Christian	Henderson	Montgomery	Washington
Clark	Henry	Muhlenberg	Webster
Clay	Hickman	Nelson	Whitley
Crittenden	Hopkins	Nicholas	Woodford
Daviess			

3. WKE is a subsidiary of LG&E Energy Corp. WKE generates electricity at four stations it operates and maintains under a 25-year lease agreement with Big Rivers Electric Corp., which distributes power to several rural electrical cooperatives. In all, the power generated at the WKE plants provides electricity for customers in 22 western Kentucky counties.

4. The attorneys for LG&E, KU and WKE authorized to represent them in this proceeding and to take service of all documents are:

Linda S. Portasik
Senior Corporate Attorney
LG&E Energy Corp.
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Louisville, Kentucky 40202

Kendrick R. Riggs
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5. On July 15, 2003, Thoroughbred Generating Company, LLC filed an application with the Kentucky State Board on Electric Generation and Transmission Siting (the "Board") for a Certificate to Construct a Merchant Electric Generating Facility. Because of a filing deficiency, however, the statutory time period in which the Board must process the case did not commence until August 4, 2003. Pursuant to 807 KAR 5:110, Section 4, a person may request leave to intervene within thirty days. As a result, the motion of LG&E, KU, and WKE to intervene is timely.

6. LG&E and KU have a special interest in this proceeding, because their transmission system and other aspects of their operations could be adversely affected by the proposed plant.

7. WKE has a special interest in this proceeding, because the proposed power plant will be connected to the electrical grid system through a 345 kV transmission line to the substation located at the D.B. Wilson plant, which is operated by WKE under a long-term lease.

8. No other person who is or may become a party to this proceeding would adequately represent or protect the interests of LG&E, KU or WKE, which are personal to them.

9. Full intervention by LG&E, KU, and WKE will also assist the Board in reaching its decision in this case without unduly interrupting the proceedings. The experience of LG&E, KU, and WKE in electric generation and transmission will allow them to contribute substantively to the discussions that will occur in this proceeding. LG&E, KU, and WKE also agree to accept the procedural schedule set forth in the Board's Order of August 19, 2003.

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WHEREFORE, Louisville Gas and Electric Company, Kentucky Utilities Company, and Western Kentucky Energy Corporation request that the Commission issue an order granting them full intervenor status.

Respectfully submitted,



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Counsel for
Louisville Gas and Electric Company, Kentucky
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CERTIFICATE OF SERVICE

22nd I hereby certify that a true copy of the foregoing Motion to Intervene was served on this day of August, 2003 by mailing a true and correct copy, by first-class postage prepaid mail, to the following:

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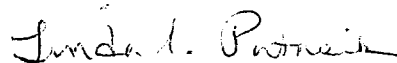
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