

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

In the Matter of:

APPLICATION OF DTE WICKLIFFE,)	
LLC, FOR A CERTIFICATE TO)	
CONSTRUCT A 13 MEGAWATT)	CASE NO. 2005-00108
MERCHANT ELECTRIC GENERATING)	
FACILITY IN BALLARD COUNTY,)	
KENTUCKY)	

MOTION OF KENTUCKY UTILITIES COMPANY
FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), Kentucky Utilities Company (“KU”) respectfully requests that it be granted full intervenor status in the above-captioned proceeding.

In support of this motion, KU states as follows:

1. KU is a utility engaged in generating, transmitting and distributing electric service in seventy-seven counties in Kentucky.
2. The attorneys for KU authorized to represent them in this proceeding and to take service of all documents are:

J. Gregory Cornett
OGDEN NEWELL & WELCH PLLC
1700 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
Telephone: (502) 582-1601

Elizabeth L. Cocanougher
Senior Regulatory Counsel
Louisville Gas and Electric Company
220 West Main Street
Post Office Box 32010
Louisville, Kentucky 40232
Telephone: (502) 627-4850

3. On April 13, 2005, DTE Wickliffe, LLC (“DTE”) filed an Application for a certificate to construct a merchant electric generating facility with the Kentucky State Board on Electric Generation and Transmission Siting (the “Board”). That Application involves a proposed steam turbine generator (“STG”) to be constructed within the boundaries of the MeadWestvaco Paper Mill (“MeadWestvaco”) in Ballard County, Kentucky.

4. MeadWestvaco is located within the certified territory of KU, pursuant to KRS 278.016, *et seq.*, and is currently served by KU pursuant to the terms of a special contract filed with and approved by the Public Service Commission of Kentucky.

5. As set forth in the Application, KU owns and maintains electric distribution and transmission facilities on and around the MeadWestvaco site, including but not limited to a substation generally referred to as the Westvaco Substation.

6. DTE’s Application, together with the attachments thereto, states that certain “modifications” to KU’s facilities would likely be required by the addition of the proposed STG.

7. KU has a special interest in this proceeding because of its status as the supplier of retail electric service to MeadWestvaco pursuant to KRS 278.016 *et seq.* and because the addition of the proposed STG could impact and require modifications to KU’s existing facilities.

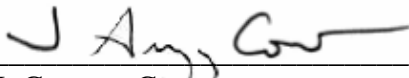
8. KU requests full intervention in this proceeding in order to protect its special interest which is not otherwise adequately represented here. No other person who is or may become a party to this proceeding would adequately represent or protect the interests of KU, which are personal to it.

9. Full intervention by KU will assist the Board in reaching its decision in this case without unduly interrupting the proceeding. KU agrees to accept the existing procedural schedule established by the Board in this proceeding.

WHEREFORE, Kentucky Utilities Company requests that the Commission issue an order granting it full intervenor status.

Dated: May 13, 2005

Respectfully submitted,

By:  _____

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Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Full Intervention was served on this 13th day of May 2005 by mailing a true and correct copy, by first-class U.S. mail, postage prepaid mail, to the following:

Bob Buchanan
Judge Executive
437 Ohio Street
Post Office Box 276
Wickliffe, Kentucky 42087-0276

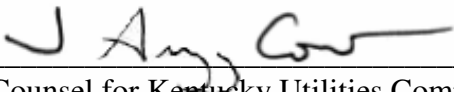
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