

COMMONWEALTH OF KENTUCKY

BEFORE THE STATE BOARD ON ELECTRIC  
GENERATION AND TRANSMISSION SITING

In the Matter of:

Joint Application of the Illinois	)	
Municipal Electric Agency and the	)	
Indiana Municipal Power Agency	)	Case No. 2005-00152
For Approval to be a 25% Partner in	)	
the Construction of a 750 Megawatt	)	
Addition to the Existing Trimble	)	
County Generating Facility in	)	
Trimble County, Kentucky	)	

Joint Applicants' Motion to Supplement Record

The Illinois Municipal Electric Agency and the Indiana Municipal Power Agency (Joint Applicants), by counsel, move to supplement the record by incorporation by reference portions of the record in Case No. 2004-00507: "Joint Application of Louisville Gas & Electric Company and Kentucky Utilities Company for a Certificate of Convenience and Necessity, and a Site Compatibility Certificate for the Expansion of the Trimble County Generating Station."

807 KAR 5:001§5(5) states:

Upon motion of any party to a proceeding, any case in the commission's files or any document on file with the commission, at the discretion of the commission may be made a part of the record "by reference only". By reference only, the case or document made a part of the record will not be physically incorporated into the record. Upon action in the

Franklin Circuit Court, excerpts from any case or part of any document may be made a part of the record before such court, at the instance of any party.

The record in Case 2004-00507 is relevant to the issues in this case in that both involve the construction and operation of the proposed Trimble County Generating Station. Because LG&E, KU and the Joint Applicants have a common interest in the proposed construction, their positions on the issues are complimentary. Also, the IBEW is a party in both cases and has raised similar issues in both. By incorporating portions of the records, a duplication of effort, time and review will be avoided.

The portions of the record from Case 2004-00507 to be incorporated are:

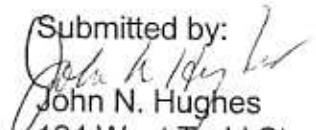
1. IBEW Motion of 3/18/05
2. IBEW reply of 3/02/05
3. IBEW data request of 3/18/05
4. IBEW Answers of 5/23/05
5. IBEW additional information of 5/23/05
6. IBEW Supplemental Information of 5/23/05
7. LG&E Application
8. LG&E Amended Application
9. LG&E data request to IBEW
10. LG&E response to IBEW
11. LG&E response to IBEW re: sealed documents
12. LG&E testimony:
  - a. Sinclair
  - b. Malloy
  - c. Voyles
  - d. Blake
  - e. Thompson

- f. Dodson
- 13. LG&E rebuttal testimony
- 14. LG&E Brief
- 15. Hearing transcript of Case 2004-00507

All of the documents are being submitted electronically, except the hearing transcript. A paper copy is being filed due to the lack of an electronic version being available from the Court Reporter. Because of the voluminous nature of these documents, the Joint Applicants move that they be incorporated electronically and that paper copies not be required.

For these reasons, the Joint Applicants move for the incorporation of the identified portions of the record of Case 2004-00507 into the record of this case.

Submitted by:

  
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Certification:

A copy of this response has been filed electronically as required by Board regulations and on the parties of record in Case 2004-00507 by first class mail the 14<sup>th</sup> day of September, 2005.

  
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John N. Hughes