

PRIDDY,  
CUTLER,  
MILLER & PLLC  
MEADE

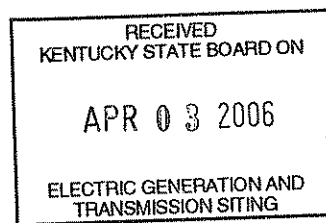
ALTON D. PRIDDY +  
IRWIN H. CUTLER, JR.  
MARK L. MILLER  
SCOTT M. MILLER \*\*  
DON C. MEADE

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\*\* ADMITTED IN COLORADO & PENNSYLVANIA  
\*\*\* ADMITTED IN CALIFORNIA

March 31, 2006

Siting Board  
P. O. Box 615  
211 Sower Blvd.  
Frankfort, KY 40602-0615



Re: Case No. 2005-00152

Dear Siting Board:

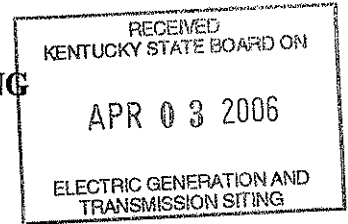
Enclosed find an original and ten copies of Intervenors', IBEW/Trades Council, Motion for Informal Conference.

Respectfully,

*Don Meade* /ss  
Don Meade

DM/sks  
Enclosures

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE KENTUCKY 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 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 )**

**CASE NO.: 2005-00152**

**INTERVENORS', IBEW/TRADES COUNCIL,  
MOTION FOR INFORMAL CONFERENCE**

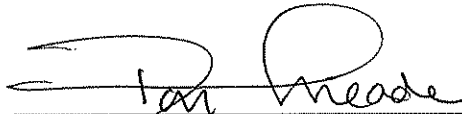
Come the Intervenor, IBEW/Trades Council, by counsel, and move the Commission to hold an informal conference with Commission staff, pursuant to 807 KAR 5:001, Section 4(4). As grounds for the motion, Intervenor Trades Council states that based upon best available information, and belief, the announced decisions of LG&E and EPC contractor Bechtel outline a hiring strategy that predictably will have the result of denying bona fide employment opportunities to the majority of skilled trade craft workers in Kentucky, resulting in the necessity of importing a substantial percentage of out of state workers to perform the job. The strategy being employed by LG&E and the EPC bidder will contravene both the letter and spirit of conditions imposed by the Siting Board in its Order of November 16, 2005. A delay in action, in light of the available information, until the time of annual reports by LG&E pursuant to Siting Board conditions, will result in irreparable injury to the economic interest of Kentucky workers whose opportunities will have been foreclosed for a year.

Intervenors seek an opportunity to disclose its information to Commission staff through an informal conference.

Intervenors seek the informal conference during the week of April 17<sup>th</sup> or week of April 24<sup>th</sup>, with preference on April 24<sup>th</sup>, 25<sup>th</sup> afternoon, 26<sup>th</sup> morning or 27<sup>th</sup> afternoon.

Respectfully submitted,

PRIDDY, CUTLER, MILLER & MEADE, PLLC




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Don Meade  
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Louisville, KY 40202  
(502) 587-8600  
**Counsel for IBEW, Local 2100 and  
Greater Louisville Building and Construction  
Trades Council**

**CERTIFICATE OF SERVICE**

It is hereby certified that on the 31<sup>st</sup> day of March, 2006, an original and 10 copies of the foregoing motion was mailed to the Siting Board, P. O. Box 615, 211 Sower Blvd., Frankfort, KY 40602-0615, and a true copy thereof was mailed to the attached service list.



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Don Meade

## SERVICE LIST

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