

COMMONWEALTH OF KENTUCKY

**BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING**

In the Matter of:

**THE APPLICATION OF THE ILLINOIS)
MUNICIPAL ELECTRIC AGENCY AND)
THE INDIANA MUNICIPAL POWER) **CASE NO. 2005-00152**
AGENCY FOR A MERCHANT ELECTRIC)
GENERATING PLANT CERTIFICATE)
TO CONSTRUCT)**

**MOTION OF LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY
FOR FULL INTERVENTION**

Pursuant to 807 KAR 5:001, Section 3(8), Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively, the “Companies”) respectfully request that they be granted full intervenor status in the above-captioned proceeding. In support of this motion, the Companies state as follows:

1. LG&E and KU are utilities engaged in generating, transmitting and distributing electric service in seventy-seven counties in Kentucky.
2. The attorneys for the Companies authorized to represent them in this proceeding and to take service of all documents are:

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3. On May 11, 2005, the Illinois Municipal Electric Agency (“IMEA”) and the Indiana Municipal Power Agency (“IMPA”) 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 IMEA’s and IMPA’s interests in a proposed new generating unit (“TC2”) at the Trimble County Generating Station.

4. TC2 is proposed to be jointly owned by the Companies and IMEA and IMPA, with the Companies collectively owning a 75% undivided interest, and IMEA and IMPA collectively owning a 25% undivided interest.

5. The Companies’ 75% interest in TC2 is the subject of an application for a certificate of public convenience and necessity and a site compatibility certificate before the Kentucky Public Service Commission in Case No. 2004-00507.

6. The Companies have a special interest in this proceeding because of their ownership interests in TC2 as set forth above.

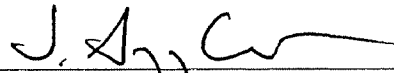
7. LG&E and KU request full intervention in this proceeding in order to protect their special interests which are not otherwise adequately represented here. No other person who is or may become a party to this proceeding would adequately represent or protect the interests of LG&E and KU, which are personal to them.

8. Full intervention by the Companies will assist the Board in reaching its decision in this case without unduly interrupting the proceeding.

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

Dated: May 27, 2005

Respectfully submitted,

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Full Intervention was served on this 27^m day of May 2005 by mailing a true and correct copy, by first-class U.S. mail, postage prepaid mail, to the following:

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