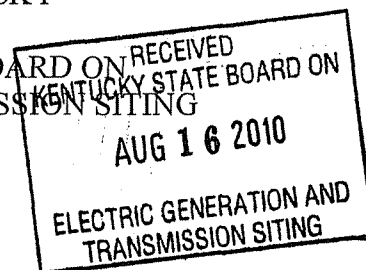


COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING



In the Matter of:

APPLICATION OF SOUTHERN INDIANA)
GAS & ELECTRIC CO., D/B/A VECTREN)
ENERGY DELIVERY OF INDIANA, INC.)
FOR A CONSTRUCTION CERTIFICATE TO)
CONSTRUCT AN ELECTRIC TRANSMISSION)
LINE FROM ITS A.B. BROWN PLANT TO THE)
BIG RIVERS EHV STATION)

CASE NO.
2010-00223

**MOTION OF HENDERSON MUNICIPAL POWER & LIGHT
FOR FULL INTERVENTION AND REQUESTS FOR PUBLIC
HEARING AND FULL EVIDENTIARY HEARING**

Comes Henderson Municipal Power & Light (hereinafter referred to as "HMP&L"), by counsel, and moves the Kentucky State Board on Electric Generation and Transmission Siting (hereinafter "Siting Board"), pursuant to KRS Chapter 278 and 807 KAR 5:110 and all other applicable law, to intervene in the above styled proceeding as a full party, with all rights and privileges of a full intervenor. In support thereof, HMP&L states as follows:

1. That HMP&L is a municipally owned electric power company providing electricity services to citizens within Henderson County, Kentucky. HMP&L owns and maintains electricity facilities and transmission lines through the County of Henderson, Kentucky.

2. On July 15, 2010, Southern Indiana Gas & Electric Co., d/b/a Vectren Energy Delivery of Indiana, Inc. ("Vectren") filed an "Application for Certificate to Construct Nonregulated Electric Transmission Line" with the Siting Board. The

Application seeks approval to site and construct a 345 kV electric transmission line.

3. That the proposed route for the Vectren line directly and adversely affects HMP&L substation property and transmission lines which are central to the operations of HMP&L.

4. That the location of the proposed Vectren line to HMP&L's existing transmission lines including, but not limited to, the existing 161 kV transmission line which runs from HMP&L's Substation 4 to a location near HMP&L's Station Two Generation Plant will be detrimental to the future operations of the lines and compromise existing system reliability.

5. That the proposed route of the Vectren line will adversely affect HMP&L's existing substation property, transmission lines, and ability to provide reliable electric service for its existing and future customer base.

6. That because of its status as a provider of electricity to citizens within Henderson County, Kentucky, and the adverse impacts which will occur to both its operations and property, HMP&L has a special and unique interest in this proceeding and moves the Siting Board to grant it status as a full party intervenor.

7. That HMP&L is an interested person under KRS 278.712 and has a special interest under 807 KAR 5:110 entitling it to full intervention in this proceeding.

8. That the special interest of HMP&L is not otherwise adequately represented by any other intervenors or the applicant.

9. That the line as proposed will significantly degrade scenic assets of the Commonwealth and that its construction as proposed will be in violation of applicable law.

10. That the Applicant does not have, nor can it obtain, the necessary rights of way to construct a line as proposed.

11. That the Application is incomplete including, but not limited to, the failure to properly notify all affected property owners.

12. That full intervention by HMP&L will assist the Siting Board in reaching its decision, and will not unduly interrupt the proceeding.

13. That the attorneys for HMP&L authorized to represent it in this proceeding and to take service of all documents are:

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14. That the Siting Board is hereby requested to hold a public hearing in Henderson County, Kentucky to provide a forum for all interested persons to comment and advise the Siting Board on issues relating to the Application herein.

15. That the Siting Board is hereby requested to hold a full, formal, evidentiary hearing on the application herein; including an opportunity for parties to tender evidence, cross examine witnesses and exercise the rights of due process of law afforded to all interested parties.

WHEREFORE, Henderson Municipal Power & Light moves that an order be entered in this proceeding granting it full intervenor status; that the Siting Board order a public hearing be held in Henderson County, Kentucky on the Application herein; that a full evidentiary hearing be held on the Application herein; and for any and all other relief to which HMP&L may be reasonably entitled including its costs and attorneys' fees herein expended.

So moved this the 16th day of August, 2010.

By: 

George L. Seay, Jr.

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*Counsel for Henderson Municipal Power &
Light*

CERTIFICATE OF SERVICE

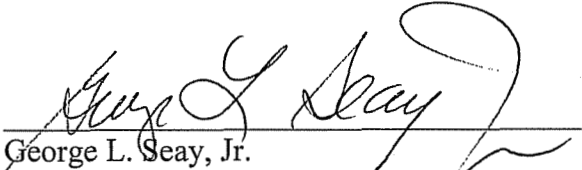
This is to certify that the original and ten true and correct copies of the foregoing has been served upon the following, by hand delivery, at the filing office of the Kentucky Public Service Commission, on this the 16th day of August, 2010:

Hon. Helen Helton
General Counsel
Public Service Commission
211 Sower Blvd
P.O. Box 615
Frankfort, KY 40602-0615

Mr. Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

and via U.S. Mail, postage prepaid to:

Jason R. Bentley, Esq
McBRAYER, McGINNIS, LESLIE & KIRKLAND, PLLC
201 East Main Street, Suite 1000
Lexington, KY 40507


George L. Seay, Jr.
Counsel for Henderson Municipal Power & Light