

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION



In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS )  
AND ELECTRIC COMPANY AND KENTUCKY )  
UTILITIES COMPANY FOR A CERTIFICATE )  
OF PUBLIC CONVENIENCE AND NECESSITY, )  
AND A SITE COMPATIBILITY CERTIFICATE, )  
FOR THE EXPANSION OF THE TRIMBLE )  
COUNTY GENERATING STATION )

CASE NO.: 2004-00507

TRADES COUNCIL/IBEW MOTION FOR  
ENLARGEMENT OF TIME TO FILE RESPONSES  
TO DATA REQUESTS

Come the Intervenors, Greater Louisville Building and Construction Trades Council (Trades Council) and International Brotherhood of Electrical Workers, Local 2100 (IBEW), and move the Commission for an Order enlarging the time for Intervenors to respond to LG&E's data requests of May 6, 2005. The propounded data requests principally seek information related to Intervenors' expert witness testimony of Larry Roberts, Executive Director of the Kentucky State Building and Construction Trades Council. There is currently pending before the Commission an LG&E Motion to Strike the Testimony of Roberts, based upon the Commission's March 4, 2005 Order restricting the scope of issues. There is also pending a Franklin Circuit Court action related to the Commission's denial of Trades Council/IBEW's Motion for Reconsideration and Motion to Compel LG&E Responses to Intervenors' Data Requests.<sup>1</sup> Further proceedings in that case are scheduled for May 20, 2005.

Given the considerable uncertainty about whether Roberts expert testimony will be permitted, or whether issues of economic benefit, as raised by Trades Council/IBEW, will further be part of the proceedings, Intervenors request an enlargement of time to respond to data requests which subsequent rulings could render unnecessary or inadmissible. Specifically, Intervenors

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<sup>1</sup>LG&E objected to responding to several of Trades Council/IBEW's data requests, citing the Commission's March 4, 2005 Order.

request an Order of the Commission enlarging the time to file responses until issues related to the admissibility of Roberts' testimony are resolved, by making data requests due ten days after an order of either the Commission or the Franklin Circuit Court.

Respectfully submitted,

PRIDDY, ISENBERG, MILLER & MEADE, PLLC



Don Meade  
800 Republic Bldg.  
429 W. Muhammad Ali Blvd.  
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 12-day of May, 2005, an original and 10 copies of the foregoing motion was mailed to the Public Service Commission, P. O. Box 615, 211 Sower Blvd., Frankfort, KY 40602-0615, and a true copy thereof was mailed to the attached service list.



Don Meade

## SERVICE LIST

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Elizabeth E. Blackford  
Office of Rate Intervention  
1024 Capital Center Drive, Ste. 200  
Frankfort, KY 40601

Michael L. Kurtz  
36 E. Seventh Street, Ste. 1510  
Cincinnati, OH 45202

Troy A. Fodor  
913 S. Sixth Street  
Springfield, IL 62703

J. Gregory Cornett  
1700 PNC Plaza  
500 W. Jefferson Street  
Louisville, KY 40202

Elizabeth L. Cocanougher  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232

Irv Maze  
Jefferson County Attorney  
Hall of Justice, 2<sup>nd</sup> Flr.  
Louisville, KY 40202

John N. Hughes  
124 W. Todd Street  
Frankfort, KY 40601

Daniel A. Lane  
Indiana Municipal Power Agency  
11610 North College Avenue  
Carmel, IN 46032

Douglas L. Jeavons  
BBC Research & Consulting  
3773 Cherry Creek North Dr., Ste. 850  
Denver, CO 80209-0448

Robert M. Watt III  
Stoll, Keenon & Park  
300 W. Vine Street, Ste. 2100  
Lexington, KY 40507-1801