

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
JUL 14 2011  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

THE 2011 JOINT INTEGRATED RESOURCE )  
PLAN OF LOUISVILLE GAS AND ELECTRIC ) CASE NO. 2011-00140  
COMPANY AND KENTUCKY UTILITIES )  
COMPANY )

---

RICK CLEWETT, DREW FOLEY, JANET OVERMAN, GREGG WAGNER, THE  
NATURAL RESOURCES DEFENSE COUNCIL, AND THE SIERRA CLUB REQUEST  
FOR A CONTINUANCE TO FILE WRITTEN COMMENTS ON THE LG&E/KU IRP

---

Intervenors Rick Clewett, Drew Foley, Janet Overman, Gregg Wagner, the Natural Resources Defense Council, and the Sierra Club (collectively “Intervenors”) for the first time move this Commission for a continuance to file written comments on the Louisville Gas & Electric and Kentucky Utilities Company’s (collectively, “Companies”) Integrated Resource Plan (“IRP”). A continuance is necessary given that the Companies have not responded to Intervenors’ timely submitted discovery requests, and to provide Intervenors with a reasonable opportunity to review such responses and draft comments regarding the IRP.

Intervenors filed a timely petition for intervention in the LG&E/KU IRP docket on May 26, 2011. Intervenors’ Petition was not granted until July 11, 2011, forty-six (46) days after the Commission docketed the motion for full intervention. Under the Public Service Commission’s May 16, 2011 Order, Intervenors’ written comments on the LG&E/KU IRP are due on July 28, 2011, which is only seventeen (17) days from the date intervention was granted. Intervenors’ ability to draft comments on the LG&E/KU IRP have been hindered to date because the Companies refused to respond to Intervenors’ timely-filed discovery requests and requests for production of documents while their intervention motion was pending. In a letter dated July 12, 2011, the Companies

informed the Commission that it would submit objections to Intervenor's discovery requests by July 15 and responses by July 29, which would deny the Intervenor the full opportunity to meaningfully comment on the IRP without a continuance of the comment deadline. Finally, significant portions of the IRP were redacted as confidential information. Now that the Commission has granted our full intervention, Intervenor should be provided access to this confidential information.

For the reasons identified herein, the Intervenor respectfully request a continuance of one month from the date on which the Companies fully respond to Intervenor's May 26, 2011 discovery requests to file written comments on the LG&E/KU IRP. In addition, Intervenor request the opportunity to propound supplemental interrogatories and requests for production on LG&E/KU no later than one week after the Companies respond to our initial discovery requests, and that the Companies be required to respond to any such supplemental discovery requests within 10 days of their being served on the Companies.

Respectfully submitted,



---

Edward George Zuger III, Esq.  
Zuger Law Office PLLC  
Post Office Box 728  
Corbin, Kentucky 40702  
(606) 416-9474

Of counsel:

Shannon Fisk, Senior Attorney  
Natural Resources Defense Council  
2 N. Riverside Plaza, Suite 2250  
Chicago, IL 60660  
Phone: (312) 651-7904  
Fax: (312) 234-9633  
sfisk@nrdc.org

Kristin Henry, Staff Attorney  
Sierra Club  
85 Second Street  
San Francisco, CA 94105  
Phone: (415) 977-5716  
Fax: (415) 977-5793  
kristin.henry@sierraclub.org

Dated: July 13, 2011

**CERTIFICATE OF SERVICE**

I certify that I served a copy of Intervenor's Request for a Continuance via first class mail on July 13, 2011, to the following:

Hon. Allyson K. Sturgeon  
Rick E. Lovekamp, Manager  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, Kentucky 40202  
*Counsel for LG&E and KU*

Hon. Dennis G. Howard II  
Hon. Lawrence W. Cook  
Attorney General's Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601-8204  
*Counsel for Intervenor Attorney General*

Hon. Michael L. Kurtz  
Hon. Kurt J. Roelvn  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
*Counsel for Intervenor KIUC*



---

Edward George Zuger III, Esq.