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Mr. Jeff DeRouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40601

**Louisville Gas and Electric  
Company**  
State Regulation and Rates  
220 W. Main Street  
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Manager, Regulatory Affairs  
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April 17, 2012

RE: *In the matter of Louisville Gas and Electric Company Alleged Failure  
to Comply with KRS 278.042*  
**Case No. 2012-00103**

Dear Mr. DeRouen:

Enclosed please find and accept for filing the original and ten copies of  
Louisville Gas and Electric Company's Response to the Commission's Order of  
March 28, 2012 and Motion to Suspend Hearing and Schedule Informal  
Conference in the above-referenced matter.

Should you require anything further, please contact me at your convenience.

Sincerely,

A handwritten signature in black ink that reads "Rick E. Lovekamp". The signature is written in a cursive style with a large initial 'R'.

Rick E. Lovekamp

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PUBLIC SERVICE  
COMMISSION

Enclosures

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**LOUISVILLE GAS AND ELECTRIC )  
COMPANY )**

**CASE NO. 2012-00103**

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)

**ALLEGED FAILURE TO COMPLY  
WITH KRS 278.042**

**RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY  
TO THE COMMISSION'S ORDER OF MARCH 28, 2012  
AND MOTION TO SUSPEND HEARING AND  
SCHEDULE INFORMAL CONFERENCE**

On March 28, 2012, the Kentucky Public Service Commission ("Commission") issued an Order directing Louisville Gas and Electric Company ("LG&E") to file a written response to the allegations contained in the Incident Investigation Report ("Report") prepared by the Commission Staff dated December 6, 2011. For its Response to the Commission's Order, LG&E states as follows:

1) LG&E admits the information contained in the sections of the Report titled "Utility," "Contract Company," "Reported By," "Title," "Address," "Contact Information," "Email," "Date Incident Occurred," "Date Utility Notified," "Date PSC Notified," "Date PSC Investigated," and all respective "Approximate Times," "PSC Investigator," "Incident Location," "County," "Fatality," "Injury," "Name(s)," "Employer," "Witness," "Address," "Employer," "Seven-Day Report Received," "Additional Information Requested and Received," "Information From," "Department" and "Company" are accurate.

2) With regard to the sections of the Report titled "Incident Description," "Findings," and

“Investigator’s Comments,” LG&E accepts the information contained therein, with the following exceptions and a few minor inconsistencies which can be addressed at the requested informal conference, which are denied. Specifically, LG&E states as follows:

- a) The report utilizes both the terms “repair” and “replace”. LG&E states the job consisted of replacement of a section of URD cable which constituted repair of the circuitry and those two terms should be treated as interchangeable for purposes of this investigation; and
- b) In the “Findings” section of the report, it is suggested that Fishel performed the parking and carding on April 17, 2011. That work was performed by an LG&E trouble technician. Fishel only verified that the bad cable was parked at both transformers on June 30, 2011.

3) With regard to the section of the Report titled “Probable Violations” LG&E denies that it committed any willful violation of KRS 278.042, the National Electric Safety Code or 807 KAR 5:006.

**NOW THEREFORE**, LG&E requests that this case be dismissed or, in the alternative, that the hearing date set for September 25, 2012 be suspended and that an informal conference be scheduled with the Commission Staff for the purposes of discussing settlement and expediting resolution of this proceeding. LG&E's willingness to discuss settlement is not, and should not be construed as, an admission of liability or fault on its part.

Dated: April 17, 2012

Respectfully Submitted,

A handwritten signature in black ink, reading "Allyson K. Sturgeon". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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Allyson K. Sturgeon  
Senior Corporate Attorney  
Louisville Gas and Electric Company  
220 West Main Street  
Louisville, KY 40202  
(502) 627-2088  
*Counsel for Louisville Gas and Electric  
Company*