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November 22, 2011

VIA HAND DELIVERY

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

RECEIVED

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**PUBLIC SERVICE
COMMISSION**

RE: The Application of Kentucky Utilities Company for Certificates of Public Convenience and Necessity and Approval of Its 2011 Compliance Plan for Recovery by Environmental Surcharge
Case No. 2011-00161

The Application of Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Approval of Its 2011 Compliance Plan for Recovery by Environmental Surcharge
Case No. 2011-00162

Dear Mr. DeRouen:

Enclosed please find and accept for filing two originals and fifteen copies each of a Joint Response of Kentucky Utilities Company and Louisville Gas and Electric Company to the Joint Motion by Drew Foley, Janet Overman, Gregg Wagner, Rick Clewett, Raymond Berry, Sierra Club and the Natural Resources Defense Council to Withdraw Their Motion to File Corrected Direct Testimony for Dr. Jeremy Fisher in the above-referenced matters. Please confirm your receipt of these filings by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me via our office courier.

Jeff DeRouen
November 22, 2011
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Should you have any questions please contact me at your convenience.

Yours very truly,


Kendrick R. Riggs

KRR:ec
Enclosures
cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR CERTIFICATES OF)
PUBLIC CONVENIENCE AND NECESSITY) CASE NO. 2011-00161
AND APPROVAL OF ITS 2011 COMPLIANCE)
PLAN FOR RECOVERY BY)
ENVIRONMENTAL SURCHARGE)**

In the Matter of:

**THE APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR CERTIFICATES)
OF PUBLIC CONVENIENCE AND NECESSITY) CASE NO. 2011-00162
AND APPROVAL OF ITS 2011 COMPLIANCE)
PLAN FOR RECOVERY BY ENVIRONMENTAL)
SURCHARGE)**

**JOINT RESPONSE OF KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY TO THE
JOINT MOTION BY DREW FOLEY, JANET OVERMAN, GREGG WAGNER,
RICK CLEWETT, RAYMOND BARRY, SIERRA CLUB, AND
THE NATURAL RESOURCES DEFENSE COUNCIL TO WITHDRAW THEIR
MOTION TO FILE CORRECTED DIRECT TESTIMONY FOR DR. JEREMY FISHER**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, the “Companies”) hereby respond to the Sierra Club and related parties’ (“Environmental Interveners”) November 17, 2011 motion to withdraw their motion to file new testimony in these proceedings, which was filed on November 3, 2011. The Companies support the Environmental Interveners’ motion to withdraw, but further move the Commission to order as withdrawn from the record the Environmental Interveners’ supplemental discovery responses filed on November 7, 2011. The Environmental Interveners’ supplemental discovery responses were based on the work Dr. Fisher performed for the November 3, 2011, “corrected” testimony the Environmental Interveners are no longer seeking to have included in the record; indeed, the

supplemental discovery responses explicitly refer to the testimony at issue: “As discussed in Dr. Fisher’s Corrected Direct Testimony”¹

In addition, the Companies further move the Commission to order as withdrawn from the record the Environmental Intervenors’ filing on November 8, 2011 of the USB storage device containing the *Strategist* Input and Output Files in support of the Fisher corrected testimony.

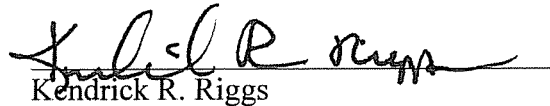
Because the discovery responses were updated to reflect testimony that was never admitted into the record of these proceedings, and the USB storage device containing the *Strategist* Input and Output Files was filed in support of the Fisher corrected testimony which the Environmental Intervenors have now moved not to have admitted into the record of these proceedings, it is necessary to also order as withdrawn the supplemental discovery responses and *Strategist* Input and Output Files from the record, as well.

WHEREFORE, the Companies respectfully request that the Commission to grant the Environmental Intervenors’ November 17, 2011 motion to withdraw their motion to file new testimony in these proceedings, which was filed on November 3, 2011. The Companies further move the Commission to order as withdrawn from the record the Environmental Intervenors’ supplemental discovery responses filed on November 7, 2011 and the *Strategist* Input and Output Files filed on November 8, 2011.

¹ Environmental Intervenors’ Supplemental Discovery Responses at 4.

Dated: November 22, 2011

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kendrick R. Riggs", written over a horizontal line.

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*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Joint Response was filed with the Kentucky Public Service Commission, and was served via U.S. mail first-class, postage prepaid, this 22nd day of November 2011 upon the following persons:

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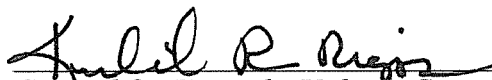
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