

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN)	CASE NO. 2014-00371
ADJUSTMENT OF ITS ELECTRIC)	
RATES)	

**RESPONSE OF KENTUCKY UTILITIES COMPANY
TO MOTION OF ALICE HOWELL, CARL VOGEL, AND SIERRA CLUB TO
RESCHEDULE HEARING SET FOR APRIL 21, 2015**

Kentucky Utilities Company (“KU” or the “Company”) respectfully asks the Commission to deny the Motion of Alice Howell, Carl Vogel, and Sierra Club to Reschedule Hearing Set for April 21, 2015. As grounds for its motion, Sierra Club asserts that its expert, Jonathan Wallach, has a long-standing family vacation scheduled for the week of April 20, 2015.

Noticeably absent from Sierra Club’s motion is any demonstration that the rescheduling of the hearing to accommodate the vacation plans of Sierra Club’s expert will not cause any inconvenience or prejudice to the Commission or the other parties to this proceeding. The Commission’s hearing calendar reflects the Commission expects to hear other cases in the weeks following this scheduled hearing, and has carefully considered its time and resources to prepare for and hear the other pending matters when establishing the hearing date in this case. And the Company’s witnesses have made or cancelled professional commitments in reliance on the Commission’s January 30, 2015 Order scheduling the hearing for April 21, 2015. At least two other parties to this proceeding have professional obligations during the week of April 27th arising from previously scheduled actions in other pending cases before the Commission.

If Sierra Club's expert cannot be available, Sierra Club could present as its expert, one of Mr. Wallach's colleagues at Resource Insight, Inc., and seek his or her professional assistance at hearing. Sierra Club's motion fails to mention this solution.

Also, because Sierra Club will not file its testimony until March 6, 2015, it is presently unknown whether the Company or any other parties will desire to question Sierra Club's witness at the hearing. If questioning Mr. Wallach becomes necessary, the Company will be willing to work with the Commission, Sierra Club, and other interested parties to arrange a mutually convenient date for Mr. Wallach to appear and be subject to cross examination before a hearing examiner; but that is a reason to deny, not grant, Sierra Club's motion.

Sierra Club could also seek to engage another expert who could be available for the currently scheduled hearing. Almost a month remains before the intervenor testimony is due.

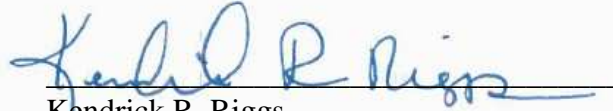
The Company further notes that although Sierra Club's counsel spoke with the Company's counsel about this matter briefly a few days before Sierra Club filed its motion, counsel did not reach an agreement on dates that might be mutually agreeable to propose to the Commission; rather, the Company's counsel clearly informed Sierra Club's counsel there were good reasons not to reschedule the hearing, and asked Sierra Club's counsel to check with Mr. Wallach to see if he could be available on April 22 or 23.

With at least three options available to Sierra Club to resolve its expert's scheduling conflict, the Company respectfully suggests that Mr. Wallach's vacation plans are an inadequate reason to reschedule the hearing in the proceeding, and asks the Commission to deny Sierra Club's motion.

WHEREFORE, Kentucky Utilities Company respectfully requests that the Commission deny the Motion of Alice Howell, Carl Vogel, and Sierra Club to Reschedule Hearing Set for April 21, 2015.

Dated: February 11, 2015

Respectfully submitted,




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Counsel for Kentucky Utilities Company

CERTIFICATE OF COMPLIANCE

This is to certify that Kentucky Utilities Company's February 11, 2015 electronic filing of the Response to Motion to Reschedule Hearing is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on February 11, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium of the Response is being mailed, by first class United States mail, postage prepaid, to the Commission on February 11, 2015.



Kenneth R. Rieps
Counsel for Kentucky Utilities Company