

# STOLL·KEENON·OGDEN

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March 24, 2010

VIA HAND DELIVERY

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

MAR 2 4 2010

PUBLIC SERVICE COMMISSION

# RE: <u>Application of Kentucky Utilities Company for an Adjustment of Base Rates</u> Case No. 2009-00548

Application of Louisville Gas and Electric Company for an Adjustment of Electric and Gas Base Rates Case No. 2009-00549

Dear Mr. DeRouen:

Enclosed please find and accept for filing two originals and ten copies of the Joint Response of Kentucky Utilities Company and Louisville Gas and Electric Company to the Motion of Kentucky School Board Association for Full Intervention in the above-referenced matters. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed selfaddressed stamped envelope.

Should you have any questions please contact me at your convenience.

Yours very truly,

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W. Duncan Crosby III

WDC:ec Enclosures cc: Parties of Record

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## **COMMONWEALTH OF KENTUCKY**

#### **BEFORE THE PUBLIC SERVICE COMMISSION**

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## In the Matter of:

APPLICATION OF KENTUCKY	
UTILITIES COMPANY FOR AN	
ADJUSTMENT OF BASE RATES	

CASE NO. 2009-00548

In the Matter of:

APPLICATION OF LOUISVILLE GAS ) AND ELECTRIC COMPANY FOR AN ) ADJUSTMENT OF ITS ELECTRIC ) AND GAS BASE RATES )

CASE NO. 2009-00549

# JOINT RESPONSE OF KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY TO THE MOTION OF KENTUCKY SCHOOL BOARD ASSOCIATION FOR FULL INTERVENTION

Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") (collectively, "Companies") submit this joint response to the motions for full intervention filed by Kentucky School Board Association ("KSBA") and advises that it does not object to the relief requested therein so long as the Commission grants the interventions on the condition that KSAB accept the existing procedural schedule in both proceedings established in the Commission's February 17, 2010 Orders. The data requests tendered with KSBA's motions are not timely and the information requested therein is already provided in the record.<sup>1</sup> The Companies will provide KSBA with this information if the Commission grants KSBA's motions for intervention.

<sup>&</sup>lt;sup>1</sup> KSBA's data request to LG&E in Items 1-3 and to KU in Items 1-4 seek the work papers of witness Steven Seelye. LG&E's responses to PSC 2-125 and KIUC 1-21 and KU's responses to PSC 2-77 and KIUC 1-21 contain this information. KSBA's data requests to LG&E in Item 4 and to KU in Item 5 seek typical bill calculations. Information sufficient to perform these calculations is already in the record in the Exhibits to Mr. Seelye's testimony, tariffs filed by LG&E and KU and in the information provided in response to LG&E PSC 2 Question Nos. 2-7 and KU PSC 2 Question Nos. 2-6.

Dated: March 24, 2010

Respectfully submitted,

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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 served via U.S. mail, first-class, postage prepaid, this 24th day of March 2010 upon the following persons:

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