

STOLL·KEENON·OGDEN

PLLC

2000 PNC PLAZA 500 WEST JEFFERSON STREET LOUISVILLE, KY 40202-2828 MAIN: (502) 333-6000 FAX: (502) 333-6099 www.skofirm.com W. DUNCAN CROSBY III
DIRECT DIAL: (502) 560-4263
DIRECT FAX: (502) 627-8754
duncan.crosby@skofirm.com

March 24, 2010

VIA HAND DELIVERY

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

RECEWED

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 self-addressed stamped envelope.

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

Yours very truly,

W. Duncan Crosby III

WDC:ec Enclosures

cc: Parties of Record

400001.134411/622641.1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In	the	Ma	tter	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)	CASE NO. 2009-00549
ADJUSTMENT OF ITS ELECTRIC)	
AND GAS BASE RATES	

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. The Companies will provide KSBA with this information if the Commission grants KSBA's motions for intervention.

-

¹ 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,

Kendrick R. Riggs

Robert M. Watt III

W. Duncan Crosby III

Monica H. Braun

Stoll Keenon Ogden PLLC

2000 PNC Plaza

500 West Jefferson Street

Louisville, Kentucky 40202-2828

Telephone: (502) 333-6000

Allyson K. Sturgeon

Senior Corporate Attorney

E.ON U.S. LLC

220 West Main Street

Louisville, Kentucky 40202

Telephone: (502) 627-2088

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:

Dennis G. Howard II Lawrence W. Cook Paul D. Adams Assistant Attorneys General Office of the Kentucky Attorney General Office of Rate Intervention 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

David C. Brown Stites & Harbison PLLC 400 West Market Street, Suite 1800 Louisville, KY 40202-3352

Michael L. Kurtz David F. Boehm Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

Lisa Kilkelly Eileen Ordover Legal Aid Society 416 W. Muhammad Ali Blvd., Suite 300 Louisville, KY 40202

Gardner F. Gillespie Dominic F. Perella Hogan & Hartson LLP 555 Thirteenth Street, N.W. Washington, DC 20004

Holly Rachel Smith Hitt Business Center 3803 Rectortown Rd. Marshall, VA 20115

Robert A. Ganton Regulatory Law Office U.S. Army Legal Services Agency 901 N. Stuart Street, Suite 525 Arlington, VA 22203-1837 Iris G. Skidmore Bates & Skidmore 415 W. Main Street, Suite 2 Frankfort, KY 40601

Frank F. Chuppe Wyatt, Tarrant & Combs, LLP 500 West Jefferson Street Suite 2800 Louisville, KY 40202-2898

Carroll M. Redford III Miller, Griffin & Marks, PSC 271 W. Short St., Ste. 600 Lexington, KY 40507

James T. Selecky BAI Consulting 16690 Swingley Ridge Road, Suite 140 Chesterfield, MO 63017

Steven A. Edwards, Esq. Administrative Law Division Office of Staff Judge Advocate 1310 Third Avenue Room 215 Fort Knox, KY 40121-5000 Katherine K. Yunker Yunker & Park PLC P. O. Box 21784 Lexington, KY 40522-1784

Mathew R. Malone William H. May II Hurt, Crosbie and May PLLC The Equus Building 127 West Main Street Lexington, Kentucky 40507 Carolyn Ridley Vice President – Regulatory TW Telecom of Kentucky, LLC 555 Church Street, Suite 2300 Nashville, TN 37219

Counsel for Kentucky Utilities Company and Louisville Gas and Electric Company