



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

KENDRICK R. RIGGS
DIRECT DIAL: (502) 560-4222
DIRECT FAX: (502) 627-8722
kendrick.riggs@skofirm.com

July 15, 2011

RECEIVED

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

JUL 15 2011

PUBLIC SERVICE
COMMISSION

RE: Case No. 2011-00140 The 2011 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company

Dear Mr. DeRouen:

Enclosed please find and accept for filing the original and ten copies of the Joint Response of Louisville Gas and Electric Company and Kentucky Utilities Company to the motion of Rick Clewett, Drew Foley, Janet Overman, Gregg Wagner, the Natural Resources Defense Council and the Sierra Club to request a continuance to file written comments regarding the Companies' Integrated Resource Plan in the above-referenced matter.

Thank you in advance for your assistance. If you have any questions, please do not hesitate to contact me.

Yours very truly,

Kendrick R. Riggs by MHB w/permission

Kendrick R. Riggs

KRR:MHB

RECEIVED

COMMONWEALTH OF KENTUCKY

JUL 15 2011

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|---------------------------------|---|---------------------|
| THE 2011 JOINT INTEGRATED |) | |
| RESOURCE PLAN OF LOUISVILLE GAS |) | CASE NO. 2011-00140 |
| AND ELECTRIC COMPANY AND |) | |
| KENTUCKY UTILITIES COMPANY |) | |

RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY TO RICK CLEWETT, DREW FOLEY, JANET OVERMAN, GREGG WAGNER, THE NATURAL RESOURCES DEFENSE COUNCIL, AND THE SIERRA CLUB REQUEST FOR A CONTINUANCE TO FILE WRITTEN COMMENTS ON THE LG&E/KU IRP

Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively, the “Companies”) hereby tender its response to the motion of Rick Clewett, Drew Foley, Janet Overman, Gregg Wagner, the Natural Resources Defense Council and the Sierra Club (collectively, “movants”) to request a continuance to file written comments regarding the Companies’ Integrated Resource Plan.

Movants were granted intervention in this proceeding on July 11, 2011. Prior to having been granted intervention, movants served discovery requests upon the Companies. As indicated in the Companies’ response to the movants’ motion to intervene, the Companies did not begin responding to the requests until the Commission had ruled upon the motion to intervene. The Commission’s Order granting intervention did not address the pending data requests. On July 12, 2011, undersigned counsel mailed a letter to Mr. Jeff DeRouen, Executive Director of the Commission, stating that the Companies would file any objections to the movants’ data requests by July 15, 2011 and responses to the requests by July 29, 2011.

On July 13, 2011, email correspondence was exchanged between the Commission Staff and counsel for the movants regarding the fact that a copy of movants’ data requests had not yet

been filed with the Commission. Due to the fact that the movants did not file a copy of their discovery with the Commission until July 15, 2011, and because of the voluminous discovery to which the Companies have been responding to in three other Commission proceedings,¹ the Companies state that they will file any objections to movants' interrogatories and requests for production of documents by July 21, 2011, which is four business days after the requests were filed with the Commission. Responses to the interrogatories and requests for production of documents will be filed by August 4, 2011. The effect of these adjustments is to extend the deadlines set forth in the Companies' July 12, 2011 letter by four business days.

The Companies do not object to the portion of movants' motion requesting that movants' written comments regarding the Companies' Integrated Resource Plan be due one month from the date on which the Companies respond to the data requests. The Companies request that their written responses to the comments be due within fifteen days after the comments are filed, which is the timeframe set forth in the procedural schedule in the Commission's May 16, 2011 Order.

If the Commission permits the movants to conduct supplemental discovery, the Companies object to the portion of movants' motion that requests that the Companies be required to respond within ten days of being served. The Companies instead request that the Commission afford the Companies fifteen days to respond as set forth in the procedural schedule.

¹ *In the Matter of: Application of Kentucky Utilities Company for an Amended Environmental Compliance Plan, a Revised Surcharge to Recover Costs, and Certificates of Public Convenience and Necessity for the Construction of Necessary Environmental Equipment* (Case No. 2011-161); *In the Matter of: Application of Louisville Gas and Electric Company for an Amended Environmental Compliance Plan, a Revised Surcharge to Recover Costs, and Certificates of Public Convenience and Necessity for the Construction of Necessary Environmental Equipment* (Case No. 2011-162); *In the Matter of: Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Existing, and Addition of New, Demand-Side Management and Energy Efficiency Programs* (Case No. 2011-00134).

Dated: July 15, 2011

Respectfully submitted,

Kendrick R. Riggs by mHB w/permission

Kendrick R. Riggs

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

LG&E and KU Services Company

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 Response was served via U.S. mail, first-class, postage prepaid, this 15th day of July 2011 upon the following persons:

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

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

Edward George Zuger III
Zuger Law Office PLLC
P.O. Box 728
Corbin, Kentucky 40702