



PPL companies

June 29, 2014

Jeff Derouen
Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
Frankfort, Kentucky 40602

LG&E and KU Energy LLC
Legal Department
220 W. Main Street
P.O. Box 32030
Louisville, Ky 40232
www.lge-ku.com

Allyson K. Sturgeon
Sr. Corporate Attorney
T 502-627-2088
F 502-627-3367
Allyson.sturgeon@lge-ku.com

RE: Tracy Mathis v. Louisville Gas and Electric Company,
Case No. 2014-00198

Dear Mr. Derouen:

Enclosed please find an original and eleven (11) copies of Louisville Gas and Electric Company's Answer to the Complainant's Complaint.

Please file-stamp the extra copy of the Motion as received and return it to me in the enclosed envelope. Should you have any questions concerning the enclosed, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Allyson K. Sturgeon". The signature is written in a cursive, flowing style.

Allyson K. Sturgeon

AKS
Enclosures

C: Ms. Tracy Mathis

RECEIVED

JUL 29 2014

**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TRACY MATHIS)	
)	
COMPLAINANT)	
)	
v.)	CASE NO.
)	2014-00198
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
)	
DEFENDANT)	

* * * * *

ANSWER OF
LOUISVILLE GAS AND ELECTRIC COMPANY

In accordance with the Kentucky Public Service Commission's ("Commission") Order of June 17, 2014 in the above-captioned proceeding, Louisville Gas and Electric Company ("LG&E" or the "Company") respectfully submits this Answer to the Complaint of Tracy Mathis ("Complainant") filed on June 2, 2014. In support of its Answer, and in response to the specific averments contained in said Complaint, LG&E states as follows:

1. LG&E admits the allegations contained in paragraphs (a) and (b) of the Complaint, on information and belief.

2. With regard to the allegations contained in paragraph (c) of the Complaint, LG&E states as follows:

a. With regard to Complainant's statements that "[m]y neighbor's power line from their house to the telephone pole runs diagonally across my front yard cutting it entirely in two. This poses a safety hazard and puts my family in to unnecessary risk of electrocution. Complaints have been previously filed and LG&E will not relocate the line unless we pay for it and get permission from our neighbors to do so. The line is LG&E's responsibility. It should have never been run the way that it is," LG&E affirmatively states that LG&E representatives have visited Complainant's address and contacted Complainant and her husband by telephone several times to discuss potential alternatives to address their concerns. After visiting the property, LG&E's Engineering & Design representatives determined that a new pole in their neighbor's front yard was not feasible as the service wire could rub the corner of the house. Instead, LG&E identified three potential options for the Complainant's consideration:

- Raise the service wire to the neighbor's house;
- Place a new pole in the road right-of-way in the Complainant's front yard close to the driveway; or
- Place the neighbor's service underground. While LG&E would apply an overhead credit toward the cost of this option, the remaining cost would have to be borne by the customer. However, the neighbor is unwilling to absorb this cost.

On July 25, 2014, because the Complainant did not choose any of the identified options within the time allotted, LG&E raised the service wire to the neighbor's house to provide additional clearance.

b. With regard to the averment "that the line be moved from our yard and relocated to the pole across from their house," LG&E affirmatively states that the three available options are identified in the paragraph above.

4. LG&E denies all allegations contained in the Complaint which are not expressly admitted in the foregoing paragraphs of this Answer.

FIRST AFFIRMATIVE DEFENSE

The Complaint, or parts of it, fails to set forth any claim upon which relief can be granted by this Commission and, therefore should be dismissed.

SECOND AFFIRMATIVE DEFENSE

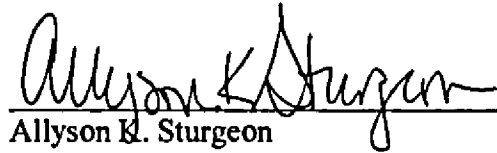
The Complainant has failed to set forth a *prima facie* case that LG&E has violated its tariff or any statute or Commission regulation, and the Complaint should be dismissed for that reason.

WHEREFORE, for all of the reasons set forth above, Louisville Gas and Electric Company respectfully requests:

- (1) that the Complaint herein be dismissed without further action taken by the Commission;
- (2) that this matter be closed on the Commission's docket; and
- (3) that LG&E be afforded any and all other relief to which it may be entitled.

Dated: July 29, 2014

Respectfully submitted,



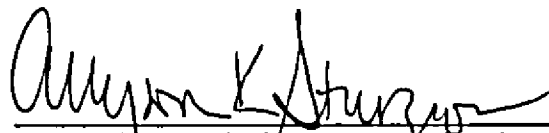
Allyson K. Sturgeon
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
(502) 627-2088

Counsel for Louisville Gas and Electric
Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following on the 29th day of July, 2014, U.S. mail, postage prepaid:

Tracy Mathis
163 Crescent Avenue
Louisville, Kentucky 40206



Counsel for Louisville Gas and Electric
Company