

Dr. Talina Mathews, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

RECEIVED

MAR 21 2017

PUBLIC SERVICE COMMISSION Kentucky Utilities Company

State Regulation and Rates 220 West Main Street P.O. Box 32010 Louisville, Kentucky 40232 www.lge-ku.com

Rick E. Lovekamp Manager Regulatory Affairs/Tariffs T 502-627-3780 rick.lovekamp@lge-ku.com

March 21, 2017

RE: <u>In the Matter of Kentucky Utilities Company Alleged Failure to Comply</u> <u>with KRS 278.042</u> Case No. 2017-00094

Dear Dr. Mathews:

Enclosed please find and accept for filing the original and ten copies of Kentucky Utilities Company's Response to the Commission's Order of March 1, 2017 and Motion to Suspend Hearing and Schedule Informal Conference in the above-referenced matter.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

Lontranf

Rick E. Lovekamp

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

))) MAR 21 2017

In the Matter of:

PUBLIC SERVICE COMMISSION

KENTUCKY UTILITIES COMPANY

CASE NO. 2017-00094

ALLEGED FAILURE TO COMPLY WITH KRS 278.042

<u>RESPONSE OF KENTUCKY UTILITIES COMPANY</u> <u>TO THE COMMISSION'S ORDER OF MARCH 1, 2017</u> <u>AND MOTION TO SUSPEND HEARING AND</u> <u>SCHEDULE INFORMAL CONFERENCE</u>

On March 1, 2017, the Kentucky Public Service Commission ("Commission") issued an Order directing Kentucky Utilities Company ("KU") to file a written response to the allegations contained in the Accident Investigation Staff Report ("Report") prepared by the Commission Staff dated January 12, 2017. For its Response to the Commission's Order, KU states as follows:

KU admits the information contained in the sections of the Report titled "Utility,"
"Address," "Phone Number," and "Email" are correct. KU notes that the field "Contact Person" is incorrect and should read "Greg Lindsey."

2) KU admits that, to the best of its knowledge, the information contained in the sections of the Report titled "Company involved with the incident," "Address," "Contact," "Phone," and "Email" are accurate.

3) KU admits that the information contained in the sections of the Report titled: "Incident

Location," "Incident Date," "Approximate Time," "Date PSC Notified," "Approximate Time," "Date PSC Investigated," "Person(s) Injured," "Injury," "Fatality," "Utility Personnel at site visit," "PSC Investigator," and "Incident Description" are accurate.

4) KU admits the information contained in the sections of the Report titled "Discussion,""Addition Information Requested," and "Note" are accurate.

5) With regard to the section of the Report titled "Conclusions," KU denies that it committed any willful violation of KRS 278.042 or the National Electric Safety Code.

NOW THEREFORE, KU requests that this case be dismissed or, in the alternative, that the hearing date set for June 21, 2017 be suspended and that an informal conference be scheduled with the Commission Staff for the purposes of discussing settlement and expediting resolution of this proceeding. KU's willingness to discuss settlement is not, and should not be construed as, an admission of liability or fault on its part.

Dated: March 21, 2017

Respectfully Submitted,

leren

Allyson K. Sturgeon Senior Corporate Attorney Sara Veeneman Corporate Attorney Louisville Gas and Electric Company 220 West Main Street Louisville, KY 40202 (502) 627-2088 (502) 627-4850 Counsel for Louisville Gas and Electric Company

CERTIFICATE OF SERVICE

I hereby certify a true and accurate copy of the foregoing was sent via U.S. First Class mail to the below person on this 21st day of March, 2017.

Quang D. Nguyen Assistant General Counsel Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

*

SARA VEENEMAN