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PUBLIC SERVICE COMMISSION E.ON U.S. LLC. Legal Department 220 West Main Street P.O. Box 32030 Louisville, Kentucky 40232 www.eon-us.com

Allyson K. Sturgeon Sr. Corporate Attorney T 502-627-2088 F 502-627-3367 Allyson.Sturgeon@eon-us.com

Stephanie L. Stumbo
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

March 31, 2008

RE: Motion of Louisville Gas and Electric Company and Kentucky Utilities Company to Eliminate Reporting Requirements

Case Nos. 2000-00095 and 2001-00104

Dear Ms. Stumbo:

Enclosed please find and accept for filing the original and 10 copies of the Motion of Louisville Gas and Electric Company and Kentucky Utilities Company to Eliminate Reporting Requirements. Please provide us with a filed stamped copy of this filing with the enclosed self-addressed stamped envelope.

If you have any questions or concerns with respect to this filing, please do not hesitate to contact me.

Sincerely,

Allyson K. Sturgeon

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AKS/kmw Enclosures

## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	)	
E.ON U.K. Ltd (formerly PowerGen plc), E.ON U.S. LLC (formerly LG&E Energy, LLC,	) CASE NO. 2000-00095	
Formerly LG&E Energy Corp.), LOUISVILLE GAS AND ELECTRIC COMPANY, AND KENTUCKY UTILITIES COMPANY	RECEIVE	)
	APR <b>0 1</b> 2008	
and	PUBLIC SERVICE COMMISSION	Ξ
In the Matter of:	)	
E.ON AG, E.ON U.K. Ltd (formerly PowerGen	) CASE NO. 2001-00104	
Plc), E.ON U.S. LLC (formerly LG&E Energy	)	
LLC, formerly LG&E Energy Corp.),	)	
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY, AND KENTUCKY UTILITIES	)	
COMPANY	<b>\</b>	

## MOTION OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY TO ELIMINATE REPORTING REQUIREMENTS

Pursuant to the May 15, 2000 and August 6, 2001 Orders of the Kentucky Public Service Commission ("Commission") in the above-captioned proceedings, Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") (hereinafter jointly the "Companies") have been required to annually file service quality monitoring reports which summarize System Average Interruption Duration Index and System Average Interruption Frequency Index at the substation level for the previous year and a comparison to the previous 5-year average. In addition, the Companies are required to file quarterly outage reports, including outages related to severe storms. These reports reflect the preceding 12 months of data and must be filed within 90 days of the end of each calendar quarter. They contain a comparison to the previous 5-year average.

Recently, the Commission issued an Order in Administrative Case No. 2006-00494<sup>1</sup> requiring all electric distribution companies within its jurisdiction to provide regular periodic reporting of reliability information. Specifically, the Commission now requires these utilities, including LG&E and KU, to file annual reports based upon the criteria and definitions set forth in the IEEE Standard, including the criteria for omitting events classified as major event days. These reports include the system average interruption frequency index, system average interruption duration index, and the customer average interruption duration index. In addition, the Commission requires each utility to provide a list of the ten worst performing circuits for the reporting year for each index value. Because LG&E and KU have repeatedly demonstrated that service quality has remained a priority with the Companies following the mergers and because reliability information is now required to be filed by all electric distribution companies in Kentucky, LG&E and KU respectfully request the Commission to eliminate the quarterly and annual reporting requirements for reliability and service quality measurements that are set forth in the Commission's Orders of May 15, 2000, and August 6, 2001, in the above-captioned proceedings.

WHEREFORE, Louisville Gas and Electric Company and Kentucky Utilities Company respectfully request the Commission to eliminate the quarterly and annual reporting requirements for reliability and service quality measurement imposed by the Commission's May 15, 2000, and August 6, 2001 Orders.

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<sup>&</sup>lt;sup>1</sup> In the Matter of: An Investigation of the Reliability Measures of Kentucky's Jurisdictional Electric Distribution Utilities and Certain Reliability Maintenance Practices, Administrative Case No. 2006-00494, Order of October 26, 2007.

Respectfully submitted,

Allyson K. Sturgeon

Senior Corporate Attorney

E.ON U.S. LLC

220 West Main Street

Louisville, Kentucky 40202

(502) 627-2088

Counsel for Kentucky Utilities Company and Louisville Gas and Electric Company

## **CERTIFICATE OF SERVICE**

It is certified that a true and correct copy of the foregoing was served via U. S. Mail, postage prepaid, this 310 day of March, 2008 upon:

Hon. Dennis Howard Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

Hon. David C. Brown, Esq. Attorney at Law Stites & Harbison, PLLC 1800 Aegon Center 400 W. Market Street Louisville, Kentucky 40202 Hon. Richard S. Taylor Attorney at Law Capital Link Consultants 225 Capital Avenue Frankfort, Kentucky 40601

Hon. Joe Childers Attorney at Law 201 W. Short Street Suite 310 Lexington, Kentucky 40507

Hon. Lisa Kilkelly Attorney at Law Legal Aid Society 425 W. Muhammad Ali Blvd Louisville, Kentucky 40202

Michael A. Laros Managing Director/Co-President Barrington-Wellesley Group, Inc. 2479 Lanam Ridge Road Nashville, Indiana 47448

Hon. Iris Skidmore
Office of Legal Services
Natural Resources and Environmental
Division of Energy
5<sup>th</sup> Floor, Capital Plaza Tower
500 Mero Street
Frankfort, Kentucky 40601

Hon. Michael L. Kutz Attorney at Law Boehm, Kutz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, Ohio 45202

Hon. David A. McCormick General Attorney Department of the Army United States Army Legal Services 901 North Stuart Street Room 713 Arlington, VA 22203-1837

Counsel for Kentucky Utilities Company and

Louisville Gas and Electric Company