

STOLL·KEENON·OGDEN

PLLC

July 9, 2008

2000 PNC PLAZA 500 WEST JEFFERSON STREET LOUISVILLE, KY 40202-2828 MAIN: (502) 333-6000 FAX: (502) 333-6099 www.skofirm.com

VIA HAND DELIVERED

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

RECEIVED

JUL **09** 2008

PUBLIC SERVICE COMMISSION

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

> RE: <u>Application of the Adjustment of Electric Rates, Terms and Conditions of</u> <u>Kentucky Utilities Company</u> Case No. 2008-00251

<u>Application of Kentucky Utilities Company to File Depreciation Study</u> Case No. 2007-00565

Application of the Adjustment of the Electric and Gas Rates, Terms and Conditions of Louisville Gas and Electric Company Case No. 2008-00252

Application of Louisville Gas and Electric Company to File Depreciation Study Case No. 2007-00564

Dear Ms. Stumbo:

Enclosed please find and accept for filing four originals and ten copies of Kentucky Utilities Company's and Louisville Gas and Electric Company's Motions to Consolidate Proceedings in the above-referenced matters. Please confirm your receipt of these filings 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.

Stephanie L. Stumbo July 9, 2008 Page 2

Yours very truly,

2. Rain 0 Kendrick R. Riggs

KRR:ec Enclosures Dennis G. Howard II, Asst Attorney General cc:

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

| In re the Matter of: |) |
|-------------------------------|-----------------------|
| AN ADJUSTMENT OF THE ELECTRIC |) CASE NO. 2008-00252 |
| AND GAS RATES, TERMS AND |) |
| CONDITIONS OF LOUISVILLE GAS |) |
| AND ELECTRIC COMPANY |) |
| In re the Matter of: |) |
| APPLICATION OF LOUISVILLE GAS |) CASE NO. 2007-00564 |
| AND ELECTRIC COMPANY TO FILE |) |
| DEPRECIATION STUDY |) |

MOTION OF LOUISVILLE GAS AND ELECTRIC COMPANY TO CONSOLIDATE PROCEEDINGS

Louisville Gas and Electric Company ("LG&E"), by counsel, moves the Public Service Commission of Kentucky ("Commission") to consolidate *In the Matter of An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company*, Case No. 2008-00252, with *In the Matter of Application of Louisville Gas and Electric Company to File Depreciation Study*, Case No. 2007-00564. The grounds supporting this motion are set forth below.

On December 28, 2007, LG&E and Kentucky Utilities Company ("KU") (collectively, the "Companies") filed with the Commission depreciation studies and applications asking the Commission to implement new depreciation rates for the Companies during their next general rate proceedings. On July 1, 2008, LG&E notified the Commission in writing of its intention to seek an adjustment of its electric and gas base rates and tariff terms and conditions.

The consolidation of these two proceedings will facilitate the Commission's review of and decision in these cases. There will be common issues of fact raised in both proceedings, and the determination of appropriate depreciation rates for LG&E will impact both proceedings. In the interests of administrative economy, to avoid unnecessary duplication of effort, and to prevent the unnecessary expenditure of resources by the Commission, as well as the parties, LG&E submits that the consolidation of the above-captioned proceedings is reasonable.

Furthermore, the Attorney General has indicated his support for consolidating these proceedings, having stated in his June 6, 2008, motion in Case No. 2007-00564, "[T]he Attorney General agrees with the companies that combining the instant cases with the upcoming rate cases would promote judicial economy and administrative efficiency"

WHEREFORE, Louisville Gas and Electric Company respectfully moves the Public Service Commission to issue an order:

- 1. Consolidating Case No. 2007-00564 with and into Case No. 2008-00252;
- Incorporating the record in Case No. 2007-00564 into the record of Case No. 2008-00252;
- 3. Closing Case No. 2007-00564; and
- 4. Establishing the current procedural schedule of Case No. 2008-00252 as the procedural schedule for the consolidated proceeding.

Dated: July 9, 2008

Respectfully submitted,

R Rim

Kendrick R. Riggs W. Duncan Crosby III 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 Louisville Gas and Electric Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was sent to the following parties of record by U.S. mail, postage prepaid, on this 9th day of July, 2008.

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

-

.

Counsel for Louisville Gas and Electric Company