

STOLL·KEENON·OGDEN

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 9, 2008

RECEIVED

JUL 09 2008

VIA HAND DELIVERED

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

PUBLIC SERVICE COMMISSION

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

Application of Kentucky Utilities Company to File Depreciation Study 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,

Kendrick R. Riggs

KRR:ec Enclosures

cc: Dennis G. Howard II, Asst Attorney General

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In re the Matter of:)	
AN ADJUSTMENT OF THE ELECTRIC RATES, TERMS AND CONDITIONS OF KENTUCKY UTILITIES COMPANY)))	CASE NO. 2008-00251
In re the Matter of:)	
APPLICATION OF KENTUCKY)	CASE NO. 2007-00565
UTILITIES COMPANY TO FILE)	
DEPRECIATION STUDY)	

MOTION OF KENTUCKY UTILITIES COMPANY TO CONSOLIDATE PROCEEDINGS

Kentucky Utilities Company ("KU"), by counsel, moves the Public Service Commission of Kentucky ("Commission") to consolidate *In the Matter of: An Adjustment of the Electric Rates, Terms and Conditions of Kentucky Utilities Company*, Case No. 2008-00251, with *In the Matter of: Application of Kentucky Utilities Company to File Depreciation Study*, Case No. 2007-00565. The grounds supporting this motion are set forth below.

On December 28, 2007, KU and Louisville Gas and Electric Company ("LG&E") (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, KU notified the Commission in writing of its intention to seek an adjustment of its electric 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 KU 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, KU 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. 2007-00565, "[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, Kentucky Utilities Company respectfully moves the Public Service Commission to issue an order:

- 1. Consolidating Case No. 2007-00565 with and into Case No. 2008-00251;
- 2. Incorporating the record in Case No. 2007-00565 into the record of Case No. 2008-00251;
- 3. Closing Case No. 2007-00565; and
- 4. Establishing the current procedural schedule of Case No. 2008-00251 as the procedural schedule for the consolidated proceeding.

Dated: July 9, 2008

Respectfully submitted,

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 Kentucky Utilities 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 Kentucky Utilities Company