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PUBLIC SERVICE  
COMMISSION

January 4, 2018

**Via Hand Delivery**

Gwen R. Pinson  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

**RE: Kentucky Industrial Utility Customers, Inc., Complainant, v. Kentucky Utilities Company, Louisville Gas and Electric Company, Kentucky Power Company, and Duke Energy Kentucky, Inc., Defendants**  
**Case No. 2017-00477**

Dear Ms. Pinson:

Enclosed please find, for filing, the original and ten copies of the Response of Kentucky Utilities Company and Louisville Gas and Electric Company to the Attorney General's *Motions to Consolidate, for Use of Electronic Filing Procedures, and for an Informal Conference Between All Parties* filed in the above-referenced matter.

Please also find enclosed for filing the original and ten copies of the *Joint Motion of Kentucky Utilities Company and Louisville Gas and Electric Company to Separate Complaint Proceeding*.

Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me via our office courier. Should you have any questions, please contact us at your convenience.

Yours very truly,

A handwritten signature in blue ink that reads "Kendrick R. Riggs".

Kendrick R. Riggs

KRR:ec

Enclosures

cc: Parties of Record in Case No. 2017-00477  
Parties of Record in Case No. 2017-00481

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY INDUSTRIAL UTILITY	)	
CUSTOMERS, INC.	)	
	)	
COMPLAINANT	)	
	)	
v.	)	
	)	CASE NO. 2017-00477
KENTUCKY UTILITIES COMPANY,	)	
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY, KENTUCKY POWER COMPANY,	)	
AND DUKE ENERGY KENTUCKY, INC.	)	
	)	
DEFENDANTS	)	

**JOINT MOTION OF KENTUCKY UTILITIES COMPANY  
AND LOUISVILLE GAS AND ELECTRIC COMPANY  
TO SEPARATE COMPLAINT PROCEEDING**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, the “Companies”), by counsel, respectfully request the Commission separate this case into four separate, utility-specific proceedings. In support of their motion, the Companies state as follows:

1. The *Complaint and Petition for the Establishment of a Regulatory Liability to Provide Consumers a Rate Reduction Because of Tax Expense Savings* (“Complaint”) filed by the Kentucky Industrial Utility Customers, Inc. (“Complainant”) on December 20, 2017, lumped together four defendant companies that have very different facts and circumstances. Two of the parties to this case, Duke Energy Kentucky, Inc. and Kentucky Power Company, have pending base rate cases before the Commission.<sup>1</sup> KU and LG&E do not. Thus, all the utilities are not

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<sup>1</sup> *In the Matter of: Application of Kentucky Power Company for (1) A General Adjustment of Its Rates for Electric Service; (2) An Order Approving Its 2017 Environmental Compliance Plant; (3) An Order Approving Its Tariffs and*

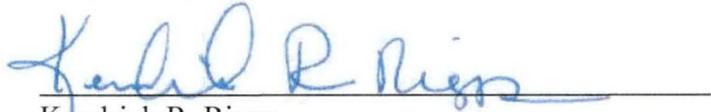
similarly situated as the Complaint suggests. Using one complaint case to resolve the impacts of a new tax law on four different utilities will unnecessarily complicate the record and will lead to inefficiencies.

2. The use of the separate proceedings will be the most economical, efficient, and effective process for addressing the questions raised in the Complaint, and will create a clear and complete record for each of the Commission's decisions.

**WHEREFORE**, Kentucky Utilities Company and Louisville Gas and Electric Company respectfully request the Commission issue orders separating KIUC's complaint case into four separate, utility-specific proceedings.

Dated: January 4, 2018

Respectfully submitted,



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Allyson K. Sturgeon  
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*Counsel for Kentucky Utilities Company and  
Louisville Gas and Electric Company*

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*Riders (4) An Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) An Order Granting All Other Required Approvals and Relief, Case No. 2017-00179, Application (Ky. Pub. Serv. Comm'n June 28, 2017); In the Matter of: Application of Duke Energy Kentucky, Inc. for: 1) An Adjustment of the Electric Rates; 2) Approval of an Environmental Compliance Plan and Surcharge Mechanism; 3) Approval of New Tariffs; 4) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 5) All Other Required Approvals and Relief, Case No. 2017-00321, Application (Ky. Pub. Serv. Comm'n Sept. 1, 2017);*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Joint Motion of Kentucky Utilities Company and Louisville Gas and Electric Company was served upon the following persons by first class U.S. Mail, postage prepaid, on the 4th day of January 2018.

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Lawrence W. Cook  
Justin M. McNeil  
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Office of the Kentucky Attorney General  
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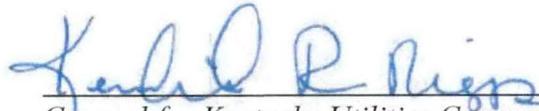
Michael L. Kurtz  
Kurt J. Boehm  
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Attn: Hector Garcia  
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P.O. Box 16631  
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Mark R. Overstreet  
Katie M. Glass  
Stites & Harbison  
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Duke Energy Kentucky, Inc.  
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