COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC AND GAS)	
RATES, A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY,)	CASE NO. 2012-00222
APPROVAL OF OWNERSHIP OF GAS)	
SERVICE LINES AND RISERS, AND A GAS)	
LINE SURCHARGE)	

JOINT MOTION TO MODIFY PROCEDURAL SCHEDULE

Louisville Gas and Electric Company ("LG&E") and Stand Energy Corporation ("Stand") (collectively, "Movants"), by counsel, hereby move the Kentucky Public Service Commission ("Commission") to modify the procedural schedule applicable only to Movants in this proceeding. In support of this Joint Motion, Movants state as follows:

- 1. On June 1, 2012, LG&E filed with the Commission its Notice of Intent to file for an increase in electric and gas rates.
- 2. On June 14, 2012, the Commission received Stand's Motion for Full Intervention. LG&E filed an Objection to Stand's Motion for Full Intervention on June 19, 2012.
- 3. On June 29, 2012, LG&E filed with the Commission an application proposing changes in its base rate gas and electric tariffs.
- 4. On July 18, 2012, the Commission issued its Procedural Schedule for this proceeding. The Procedural Schedule established the dates by which requests for information, responses, and testimony must be filed.

¹ This Motion and any modified procedural schedule will not affect Case No. 2012-00221, In the Matter of: Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates.

- 5. On September 14, 2012, the Commission granted Stand "limited intervention solely to participate on the issue of LG&E's gas transportation thresholds."²
- 6. After the Commission granted Stand limited intervention, counsel for Movants began discussions to determine a mutually acceptable schedule for allowing discovery requests and responses, and for the filing of testimony.
- 7. Movants' discussions have led them to propose the following procedural schedule applicable only to Movants:
 - (a) Stand shall file requests for information, not to exceed 25 requests, including subparts, to LG&E no later than September 21, 2012;
 - (b) LG&E shall file responses to Stand's requests for information no later than October 3, 2012;
 - (c) Stand shall file its verified testimony, if any, no later than October 10, 2012;
 - (d) LG&E shall file requests for information, not to exceed 25 requests, including subparts, to Stand no later than October 15, 2012; and
 - (e) Stand shall file responses to LG&E's requests for information no later than October 24, 2012.
- 8. Movants have reviewed the modified procedural schedule proposed herein, and agree that said schedule is reasonable in light of the present procedural posture of the proceeding.
- 9. Movants' proposal applies only to discovery and testimony between the Movants.

 Movants are not proposing to alter or amend the Procedural Schedule established by the Commission in its July 18, 2012 Order as it relates to any other parties or dates therein.

² Case No. 2012-00222, Order at 5 (Sept. 14, 2012).

WHEREFORE, Louisville Gas and Electric Company and Stand Energy Corporation respectfully ask the Commission to issue an order adopting the proposed procedural schedule applicable only to Movants in this proceeding.

Dated: September 18, 2012

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Louisville Gas and Electric Company's September 18, 2012 electronic filing of the Joint Motion to Modify Procedural Schedule is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on September 18, 2012; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and two copies in paper medium of the Joint Motion are being mailed to the Commission on September 18, 2012.

Counsel for Louisville Gas and Electric Company