

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Kentucky Cable Telecommunications Association,)	
)	Case No. 2014-00025
)	
Complainant,)	
)	
v.)	
)	
Louisville Gas and Electric Company and Kentucky Utilities Company,)	
)	
Defendants.)	

**KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION’S
MOTION TO CONSOLIDATE**

The Kentucky Cable Telecommunications Association (“KCTA”) respectfully moves to consolidate the above-referenced proceeding with Case Numbers 2014-00371 and 2014-00372, Kentucky Utilities Company and Louisville Gas & Electric Company’s (collectively “the Companies”) Notices of Intent and Election to File Application for a General Adjustment in Electric Rates.

In support of the foregoing motion, KCTA states that this proceeding and Case Numbers 2014-00371 and 2014-00372 involve common issues of fact and law. On January 14, 2014, KCTA filed a Complaint in the above-referenced proceeding to challenge the reasonableness of the Companies’ pole attachment rates under the Commission’s pole rate methodology using the Companies’ costs that were in effect at the time the rates were instituted. *See* Complaint, ¶¶ 21-22. And on December 9, 2014, KCTA moved to intervene in case numbers 2014-00371 and 2014-00372 to challenge the reasonableness and legality of the Companies’ pole attachment rates in the current rate proceeding.

Consolidation of the two proceedings will conserve time, energy, and resources of the parties and of the Commission. *See, e.g., Big Rivers Elec. Corp.'s Notice of Changes in Its Rates for Electricity Sold to Member Cooperatives*, Case No. 9163, Order, at 1-2 (Ky. PSC Dec. 28, 1984) (granting a motion to consolidate a complaint alleging unreasonable rates with the utilities' application to increase rates because the two proceedings had common questions of fact and law and consolidation promoted an "economical and expeditious disposition of the two proceedings").

WHEREFORE, KCTA moves for consolidation of the above-referenced proceeding with case numbers 2014-00371 and 2014-00372.

Respectfully submitted,

/s/ Laurence J. Zielke

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**ATTORNEYS FOR THE KENTUCKY CABLE
TELECOMMUNICATIONS ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Kentucky Cable Telecommunications Association's Motion to Consolidate has been served on all parties of record via hand delivery, facsimile, or electronically this 23rd day of December, 2014.

/s/ Laurence J. Zielke

Laurence J. Zielke