

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR A DECLARATORY ORDER)	CASE NO. 2016-00317
REGARDING THE PROPER METHOD OF)	
MUNICIPAL FRANCHISE FEE RECOVERY)	

RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY
TO MOTION TO COMPEL

Louisville Gas and Electric Company (“LG&E” or “Company”) hereby responds to Louisville/Jefferson County Metro Government’s (“Louisville Metro”) Motion to Compel and Suspend the Procedural Schedule (“Motion to Compel”).

On March 24, 2017, Louisville Metro filed its Request for Information to LG&E in the above-captioned proceeding and on April 7, 2017, LG&E filed its Response. On April 20, 2017, Louisville Metro filed its Motion to Compel the responses from LG&E on Questions Nos. 1 and 12 of Louisville Metro’s Request for Information.

LG&E objects to the Motion to Compel. Without waiver of its objection, in an attempt to resolve this discovery dispute, counsel for LG&E has contacted counsel for Louisville Metro to schedule a call to discuss the matter in further detail. Counsel for LG&E will file by letter a status report on the parties’ efforts to resolve this dispute no later than May 15, 2017.

LG&E reserves the right to file a supplemental response to Louisville Metro’s Motion to Compel if LG&E and Louisville Metro are unable to resolve this discovery dispute.

Under the Commission’s *Rules of Procedure*, the Commission may extend by order the period of time a party to a case shall file a response to a motion. 807 KAR 5:001 Section 5(2).

WHEREFORE, Louisville Gas and Electric Company respectfully requests pursuant to 807 KAR 5:001 Section 5(2) the Commission enter an order extending the period of time for LG&E to respond to the Motion to Compel of Louisville/Jefferson County Metro Government no later than 7 days from the date the parties report the dispute cannot be resolved.

Dated: April 27, 2017

Respectfully submitted,




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Counsel for Louisville Gas and Electric Company

CERTIFICATE OF SERVICE

This is to certify that Louisville Gas and Electric Company's April 27, 2017 electronic filing 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 April 27, 2017; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



Counsel for Louisville Gas and Electric Company