## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

)

)

)

In the Matter of:

ELECTRONIC JOINT APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY FOR REVIEW, MODIFICATION, AND CONTINUATION OF CERTAIN EXISTING DEMAND-SIDE MANAGEMENT AND ENERGY EFFICIENCY PROGRAMS

CASE NO. 2017-00441

## JOINT MOTION OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY FOR LEAVE TO FILE REBUTTAL TESTIMONY

Louisville Gas and Electric Company and Kentucky Utilities Company (collectively "Companies") hereby move the Public Service Commission ("Commission") to grant the Companies leave to file rebuttal testimony in this case on Tuesday, April 24, 2018. As the applicants in this proceeding, the Companies bear the burden of proof, and therefore respectfully request the opportunity to rebut several of the claims made in the testimony submitted by Cathy Hinko, the witness for the Metropolitan Housing Coalition, and Kenneth Baker, the witness for Wal-Mart Stores East, LP and Sam's East, Inc.

The Companies do not believe that allowing rebuttal testimony will prejudice the Commission's investigation or the current procedural schedule. Rebuttal testimony typically narrows the issues in dispute, reduces the length of the hearing (if any), and provides the Commission a more complete and effective record. No hearing is currently scheduled in this proceeding, so no adjustment to a hearing date is necessary to accommodate the Companies' request. Also, a deadline of April 24 for the Companies to file their rebuttal testimony will afford all parties adequate time to review the Companies' rebuttal testimony and determine

whether to request an evidentiary hearing by the Commission's current April 26 deadline for filing such a request.

**WHEREFORE,** the Companies respectfully move the Commission for leave to file rebuttal testimony in the record of this case on April 24, 2018.

Dated: March 26, 2018

Respectfully submitted,

Kendrick R. Riggs W. Duncan Crosby III Joseph T. Mandlehr Stoll Keenon Ogden PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, Kentucky 40202 Telephone: (502) 333-6000 Fax: (502) 627-8722 kendrick.riggs@skofirm.com duncan.crosby@skofirm.com joseph.mandlehr@skofirm.com

Allyson K. Sturgeon Senior Corporate Attorney Sara Judd Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, Kentucky 40202 Telephone: (502) 627-2088 Fax: (502) 627-3367 allyson.sturgeon@lge-ku.com sara.judd@lge-ku.com

Counsel for Kentucky Utilities Company and Louisville Gas and Electric Company

## **CERTIFICATE OF COMPLIANCE**

This is to certify that Kentucky Utilities Company and Louisville Gas and Electric Company's March 26, 2018 electronic filing of their Joint Motion for Leave to File Rebuttal Testimony 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 March 26, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies in paper medium of the Response are being mailed by first class U.S. Mail, postage prepaid, to the Commission on March 26, 2018.

asta

Counsel for Louisville Gas and Electric Company and Kentucky Utilities Company