



Mr. Jeff DeRouen  
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Kentucky Public Service Commission  
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November 18, 2009

RE: Consideration of the New Federal Standards of the Energy  
Independence and Security Act of 2007  
Case No. 2008-00408

Dear Mr. DeRouen:

Please accept for filing the original and ten (10) copies of this Joint Response to Commission's Intra-Agency Memorandum dated November 2, 2009, which is being offered on behalf of Big Rivers Electric Corporation, Duke Energy Kentucky, Inc., East Kentucky Power Cooperative, Inc., Kentucky Power Company, Kentucky Utilities Company, and Louisville Gas and Electric Company (collectively "Joint Parties") in the above-referenced docket.

The purpose of this response is to provide general comments of the Joint Parties concerning the establishment of a collaborative process relating to the Smart Meter technology deployment and time-of-use rates as noted in the memorandum.

Each of the Joint Parties have articulated in their direct testimony and through data responses the operating efficiencies and enhanced customer and utility communications that may be derived from the implementation of Smart Meters and a Smart Grid. Industry experience with this emerging technology continues to provide valuable insight and should ultimately result in improved technology and implementation. However, as discussed at the Informal Conference by the Joint Parties, technology is evolving and there is no one size fits all approach to Smart Meter/Grid implementations.

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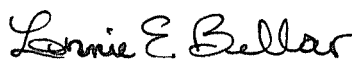
To further assist the development of Smart Meter/Grid deployments in Kentucky, a collaborative group could help to define the guiding principles for such deployments. The group should not be tasked with developing industry standards as that work is ongoing at the federal level, but instead work towards development of a consensus where possible, on the guiding principles for deployment of smart meters, distribution and transmission systems, and security. Each of the Joint Parties is desirous of participating in a collaborative group.

In addition, the emergence of federal standards and protocols along with other states' regulations can provide additional guidance for reviewing proposed deployments in the Commonwealth of Kentucky. Particular consideration by the collaborative group should be given to the applicable recovery mechanisms for such deployments and how the retirement of current infrastructure should be included in the analysis.

The Joint Parties believe the Commission should be cautious when establishing or adopting a standard for the deployments of Smart Meter/Grid technology to ensure that such a decision is not outpaced by technology and the investments are providing sufficient benefits to the customers.

Should you have any questions concerning the response, please contact me or any representative of the Joint Parties at your convenience.

Sincerely,

 by REL

Lonnie E. Bellar

cc: Parties of Record