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August 10, 2006

## VIA HAND DELIVERY

Chairman Sara Kyle Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

Appropriateness of Implementation of PURPA Standard 11 (Net

Metering), Standard 12 (Fuel Sources), Standard 13 (Fossil Fuel Generation Efficiency), Standard 14 (Time Based Metering and

Communication) and Standard 15 (Interconnection) for

Kentucky Utilities Company

Docket No. 06-00183

Dear Chairman Kyle:

Enclosed you will find a letter dated August 10, 2006 from F. Howard Bush, Jr., Manager of Tariffs/Special Contracts for Kentucky Utilities to be filed in the above-referenced docket. This letter supercedes the letter dated July 19, 2006 that was filed on July 20, 2006.

Sincerely,

D. Billve Sanders

Attorney for Kentucky Utilities Company

D. Bellye Sanders

DBS/dh Enclosure

## Waller Lansden Dortch & Davis, PLLC

Chairman Sara Kyle August 10, 2006 Page 2

cc: John Wade Hendricks, Esq. Allyson Sturgeon, Esq. F. Howard Bush, Jr.



Ms. Darlene Standley Chief, Utilities Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

August 10, 2006

RE: Docket No. 06-00183

Dear Ms. Standley:

This letter regards Kentucky Utilities Company's ("KU") intentions related to the five residential KU customers served under the Tennessee Regulatory Authority's ("TRA") jurisdiction and the impact on those customers by the Energy Policy Act of 2005 ("EPA"). KU currently does not serve any other customers under TRA jurisdiction.

The current KU Tennessee tariff under which the five residential customers are served contains a off-peak water heating rate which meets Standard 14, "Time Based Metering and Communication" of the EPA.

KU's tariff, as approved for its Kentucky customers, contains a provision for Standard 11, "Net Metering". The Net Metering tariff contains the conditions for Interconnection, Standard 15. Larger customers also have available time-of-day rates and load curtailment incentives which address Standard 14, "Time Based Metering and Communication".

KU has no generation in the State of Tennessee and does not believe that Standard 12, "Fuel Sources", or Standard 13, "Fossil Fuel Generation Efficiency", as provided for by the EPA, are relevant for consideration by the TRA as they relate to KU's Tennessee jurisdiction.

KU will make Net Metering in its Kentucky tariff available to its five Tennessee customers upon request. If a customer requests Net Metering, all terms and conditions applicable to the service will be applied. As stated above, Time Based Metering is available in KU's TN tariff. Therefore, KU requests that the TRA find KU in compliance with the Net Metering/Interconnection, and Time

Kentucky Utilities Company State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.eon-us.com

F. Howard Bush Manager - Tariffs/Special Contracts T 859-367-5636 (Lexington) T 502-627-4136 (Louisville) F 502-627-3213 howard.bush@eon-us.com Ms. Darlene Standley August 10, 2006

Based Metering and Communication standards of the Public Utility Regulatory Policies Act of 1978 (PURPA) as amended by the EPA. Since KU has no generation in TN, KU requests that the TRA find that the standards regarding generation are not applicable to KU in TN.

If you have any questions, please contact me at (859) 367-5636.

Sincerely,

F. Howard Bush Jr.