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May 15, 2019

VIA FEDERAL EXPRESS DELIVERY

Executive Director Earl Taylor
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, TN 37243

RE: **Petition of Kentucky Utilities Company for (1) An Order Authorizing Kentucky Utilities Company to Abandon Its Service Area in Tennessee and to Withdraw Its Tariff for Electric Service and (2) An Order Declaring that Kentucky Utilities is No Longer a Public Utility Under Tennessee Law and No Longer Subject to Tennessee Public Utility Commission Regulation**
Docket No. 19-00001

Dear Mr. Taylor:

Enclosed please find for filing on behalf of Kentucky Utilities Company the original and four (4) copies of a *Motion for Leave to Amend Petition*.

Should you have any questions or need any additional information, please contact me at your convenience.

Yours very truly,

A handwritten signature in black ink, appearing to read "Kendrick R. Riggs", with a long, sweeping horizontal line extending to the right.

Kendrick R. Riggs

KRR:ec

Enclosures

cc: Monica Smith-Ashford, Deputy General Counsel, TN Public Utility Commission (w/ encl.)
Allyson K. Sturgeon, Managing Senior Counsel, Regulatory and Transactions (w/ encl.)

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

**PETITION OF KENTUCKY UTILITIES)
COMPANY FOR (1) AN ORDER)
AUTHORIZING KENTUCKY UTILITIES)
COMPANY TO ABANDON ITS SERVICE AREA)
IN TENNESSEE AND TO WITHDRAW ITS)
TARIFF FOR ELECTRIC SERVICE AND (2) AN)
ORDER DECLARING THAT KENTUCKY)
UTILITIES IS NO LONGER A PUBLIC)
UTILITY UNDER TENNESSEE LAW AND NO)
LONGER SUBJECT TO TENNESSEE PUBLIC)
UTILITY COMMISSION REGULATION)**

Docket No. 19-00001

MOTION FOR LEAVE TO AMEND PETITION

Over the years, Kentucky Utilities Company (“KU” or the “Company”) has provided retail electric service to a small number of customers in portions of Claiborne County, Tennessee pursuant to its Certificate of Public Convenience and Necessity (“CCN”) issued by the Tennessee Public Utility Commission (“Commission”). On December 31, 2018, KU filed the above-captioned Petition with the Commission. The Petition requests the Commission pursuant to Tenn. Code Ann. § 65-4-114, to authorize KU to abandon its small service area just across the Kentucky-Tennessee state line along State Route 132 in Claiborne County, Tennessee where four former residential properties were previously served, and close and withdraw its tariff for electric service in the state of Tennessee. In addition, the Company further requests, pursuant to Tenn. Code Ann § 65-2-104, an Order from the Commission declaring that KU is no longer a public utility under Tennessee law, and therefore is no longer subject to regulation by the Commission. The Commission established the above-referenced docket to consider KU’s Petition.

KU hereby respectfully moves for leave to amend its Petition to instead request the specific relief of abandonment of its CCN to provide electric service in Tennessee, pursuant to Tenn. Code Ann. § 65-4-114, generally Part 2 of Chapter 4 of Title 65 of Tennessee Code

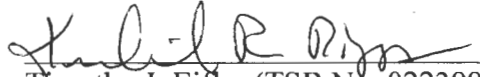
Annotated and specifically Tenn. Code Ann. § 65-4-204. The grounds supporting KU's request to abandon its CCN are set forth in detail in the Petition.

WHEREFORE, Kentucky Utilities Company respectfully requests that the Commission grant its *Motion for Leave to Amend Petition* and enter an order:

1. Withdrawing the certificate of public convenience and necessity that provides Kentucky Utilities Company the regulatory authority to provide retail electric service to its service area in a small portion of Claiborne County, Tennessee;
2. Authorizing Kentucky Utilities Company to withdraw its tariff for electric service from the Commission; and
3. Granting any and all other relief to which Kentucky Utilities Company may be entitled.

Dated: May 15, 2019

Respectfully Submitted,



Timothy J. Eifler (TSB No. 022399)

Kendrick R. Riggs

(Admitted *pro hac vice*)

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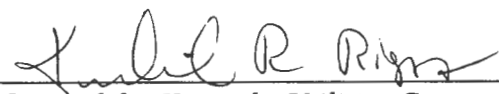
allyson.sturgeon@lge-ku.com

Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Leave to Amend Petition was served via regular mail and electronic mail upon the following counsel of record on the 15th day of May, 2019:

Monica Smith-Ashford
Deputy General Counsel
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243



Counsel for Kentucky Utilities Company