

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION**

SIERRA CLUB,

Plaintiff,

v.

**LOUISVILLE GAS AND ELECTRIC
COMPANY,**

Defendant.

C.A. No. 3:14-CV-391-H

ELECTRONICALLY FILED

JOINT MOTION TO LODGE AND ENTER CONSENT DECREE

Plaintiff Sierra Club and Defendant Louisville Gas and Electric Company (“LG&E”) move to lodge the attached Consent Decree and Appendix (“the Consent Decree”) with the Court for later entry in accordance with the following paragraph of this joint motion. The Consent Decree represents a settlement of all claims presented by Sierra Club against LG&E in this case. The parties represent that the settlement terms are appropriate, reasonable, and in the public interest.

Under Section 505(c)(3) of the Clean Water Act and 40 C.F.R. § 135.5(b), the United States has 45 days from receipt of a proposed consent judgment by the Department of Justice Citizen Suit Coordinator (on behalf of the Attorney General) and the U.S. Environmental Protection Agency to review the proposed consent judgment and provide any comments to the Court. Pursuant to 40 C.F.R. § 135.5(b), Plaintiff Sierra Club will promptly serve the United States and promptly notify the Court once the United States confirms receipt of service. At the conclusion of that review period, the parties jointly request that the Court enter the Consent Decree.

Respectfully submitted this 27th day of September, 2016.

/s/ J. Gregory Cornett (w/ permission)

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will serve notice electronically on all counsel of record, including the following:

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