

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 30 2011

PUBLIC SERVICE
COMMISSION

In The Matter Of: The Application Of Big Rivers
Corporation For General Adjustment of Rates

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Case No. 2011-00036

**MOTION OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO DEVIATE FROM RULE GOVERNING FILING OF COPIES**

Kentucky Industrial Utility Customers, Inc. ("KIUC"), by counsel, petitions the Kentucky Public Service Commission ("Commission") to grant KIUC approval, pursuant to 807 KAR5:001, § 14, to deviate from the requirement that parties file an original and (10) ten complete copies of all data responses and attachments. KIUC requests that it be excused from filing any paper copies of its Responses to Commission Staff's Initial Information Request 9 and Big Rivers Electric Corporation's ("BREC") First Set of Data Requests 33, 34, 35, and 38. KIUC also requests that it be excused from filing a portion of its Responses to BREC Requests 28 and 30. A Memorandum in Support of this Motion is attached.

Respectfully submitted,



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**COUNSEL FOR KENTUCKY INDUSTRIAL
UTILITY CUSTOMERS, INC.**

June 28, 2011

MEMORANDUM IN SUPPORT OF MOTION TO DEVIATE

On June 9, 2011 KIUC provided 4 (Public) CD's and 1 (Confidential) CD in response to the data requests of Commission Staff and BREC. Several of these responses provided information in *Microsoft Excel* format with formulas intact per the request of Commission Staff and BREC. When these exhibits are converted into standard paper format, they amount to approximately 400,000 pages. The *Excel* files requested by Commission Staff and BREC are not intended to be viewed in paper format. In fact, they are useless in paper format as they amount to page after page of raw data. For illustrative purposes, a small sampling of this data is attached to this Motion (*see* Attachment 1).

In order to comply with the letter of the Commission rules, KIUC would have to print nearly 4.5 million copies of useless data. Even a single copy of KIUC's full responses would require nearly a half million pages. Obviously, this would be an extreme waste of time, money and KPSC file room space.

KIUC requests that the Commission allow it to provide the standard original and ten copies of all responses and attachments that are not overly voluminous and be excused from providing any paper copies of the responses described above. Specifically, KIUC requests that it be excused from filing any paper copies of the responses to Staff Request 9 and BREC Requests 33, 34, 35, and 38. KIUC proposes that it provide the standard amount of copies of the "Wholesale Market Analysis" in response to BREC 28, 31 and 32 and the "Simulation Analysis" in response to BREC 30, but that it be excused from providing any paper copies of the other attachments to BREC 28 and BREC 30. If the Commission grants this request it will reduce the amount of pages printed for a single complete copy from approximately 400,000 pages to roughly 1,200 pages.

All of the information requested by Commission Staff and BREC are contained on the CDs already provided. KIUC will provide 10 copies of the 4 (public) CDs to the Commission pursuant to Commission rules. KIUC will also provide additional copies of the CDs upon request.

WHEREFORE, KIUC requests deviation from the requirement that parties provide an original and ten (10) paper copies of data responses. KIUC requests that it be allowed to instead submit CDs in compliance with this rule.

Respectfully submitted,



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UTILITY CUSTOMERS, INC.**

June 29, 2011

ATTACHMENT 1

MARKET_D	NODE	TYPE	VALUE	HE01	HE02	HE03	HE04	HE05
7/1/2009	AEC	Interface	LMP	14.47	15.59	15.35	14.14	16.48
7/1/2009	AECI	Interface	LMP	13.99	15.1	14.81	13.67	15.9
7/1/2009	AECI.ALTW	Loadzone	LMP	14.49	15.6	15.01	14.03	13.97
7/1/2009	AECI.AMM	Loadzone	LMP	14.25	15.34	15.08	13.9	16.17
7/1/2009	AECI.APM_Hub	Hub	LMP	14.27	15.36	15.1	13.92	16.19
7/1/2009	AECI.APM	Hub	LMP	13.7	14.79	14.52	13.39	15.57
7/1/2009	AECI.CWLD	Loadzone	LMP	13.7	14.79	14.52	13.39	15.57
7/1/2009	AEP	Interface	LMP	14.57	15.68	15.5	14.26	21.68
7/1/2009	ALTE.ALTE	Loadzone	LMP	14.38	15.5	15.21	14.01	2.9
7/1/2009	ALTE.AZ	Hub	LMP	14.38	15.5	15.21	14	2.91
7/1/2009	ALTE.BLACI	Gennode	LMP	14.2	15.28	15.04	13.85	2.13
7/1/2009	ALTE.BLACI	Gennode	LMP	14.2	15.28	15.04	13.85	2.13
7/1/2009	ALTE.CC.RI'	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.CC.RI'	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.CEDA	Gennode	LMP	14.42	15.55	15.29	14.07	2.59
7/1/2009	ALTE.COLU	Gennode	LMP	14.13	15.23	14.99	13.81	2.39
7/1/2009	ALTE.COLU	Gennode	LMP	14.13	15.23	14.99	13.81	2.38
7/1/2009	ALTE.DPC	Loadzone	LMP	13.94	15.09	14.53	13.51	4.34
7/1/2009	ALTE.EDEN	Gennode	LMP	13.91	15.05	14.51	13.5	3.27
7/1/2009	ALTE.EDGG	Gennode	LMP	14.44	15.56	15.31	14.08	2.4
7/1/2009	ALTE.EDGG	Gennode	LMP	14.44	15.57	15.32	14.09	2.37
7/1/2009	ALTE.EDGG	Gennode	LMP	14.42	15.56	15.31	14.08	2.35
7/1/2009	ALTE.GSE_	Hub	LMP	13.94	15.1	14.54	13.52	4.35
7/1/2009	ALTE.KILBC	Gennode	LMP	14.27	15.38	15.12	13.92	2.93
7/1/2009	ALTE.NEDG	Gennode	LMP	13.59	14.73	14.11	13.17	3.72
7/1/2009	ALTE.NEDG	Gennode	LMP	13.59	14.72	14.11	13.17	3.72
7/1/2009	ALTE.NEEN	Gennode	LMP	14.27	15.4	15.14	13.91	2.77
7/1/2009	ALTE.NEEN	Gennode	LMP	14.27	15.4	15.14	13.91	2.77
7/1/2009	ALTE.PAR_	Hub	LMP	14.46	15.57	15.32	14.1	2.82
7/1/2009	ALTE.PDSG	Gennode	LMP	14.27	15.37	15.11	13.92	2.74
7/1/2009	ALTE.PRAR	Gennode	LMP	14.26	15.36	15.1	13.91	2.73
7/1/2009	ALTE.ROCK	Gennode	LMP	14.24	15.33	15.09	13.89	2.32
7/1/2009	ALTE.ROCK	Gennode	LMP	14.24	15.33	15.09	13.89	2.32
7/1/2009	ALTE.ROCK	Gennode	LMP	14.24	15.33	15.09	13.89	2.32
7/1/2009	ALTE.RORG	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.RORG	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.RORG	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.RORG	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.RORG	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.SFON	Gennode	LMP	14.36	15.48	15.23	14.01	2.54
7/1/2009	ALTE.SFON	Gennode	LMP	14.36	15.48	15.23	14.01	2.54
7/1/2009	ALTE.SFON	Gennode	LMP	14.36	15.48	15.23	14.01	2.54
7/1/2009	ALTE.SFON	Gennode	LMP	14.36	15.48	15.23	14.01	2.54
7/1/2009	ALTE.SHEB	Gennode	LMP	14.22	15.34	15.09	13.87	2.05
7/1/2009	ALTE.SHEB	Gennode	LMP	14.22	15.34	15.09	13.87	2.05
7/1/2009	ALTE.SHEE	Gennode	LMP	14.6	15.7	15.44	14.21	2.73

7/1/2009	ALTE.TOWI	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.TOWI	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.TOWI	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.TOWI	Gennode	LMP	14.26	15.34	15.1	13.9	2.21
7/1/2009	ALTE.TURT	Gennode	LMP	14.27	15.35	15.11	13.91	2.21
7/1/2009	ALTE.WPPI	Hub	LMP	14.39	15.53	15.08	13.96	3.69
7/1/2009	ALTW.6STÉ	Gennode	LMP	13.66	14.77	14.03	13.18	5.98
7/1/2009	ALTW.6STÉ	Gennode	LMP	13.66	14.77	14.03	13.18	5.98
7/1/2009	ALTW.6STÉ	Gennode	LMP	13.66	14.77	14.03	13.18	5.98
7/1/2009	ALTW.6STÉ	Gennode	LMP	13.66	14.77	14.03	13.18	5.98
7/1/2009	ALTW.8THÉ	Gennode	LMP	13.82	14.94	14.21	13.36	4.33
7/1/2009	ALTW.8THÉ	Gennode	LMP	13.82	14.94	14.21	13.36	4.33
7/1/2009	ALTW.8THÉ	Gennode	LMP	13.82	14.94	14.21	13.36	4.33
7/1/2009	ALTW.ADA	Gennode	LMP	13.56	14.72	14.09	13.1	5.86
7/1/2009	ALTW.AGEI	Gennode	LMP	13.79	14.94	14.5	13.55	7.65
7/1/2009	ALTW.AGEI	Gennode	LMP	13.79	14.94	14.5	13.55	7.65
7/1/2009	ALTW.AGEI	Gennode	LMP	13.79	14.94	14.5	13.55	7.65
7/1/2009	ALTW.AGEI	Gennode	LMP	13.79	14.94	14.5	13.55	7.65
7/1/2009	ALTW.ALT	Loadzone	LMP	13.79	14.91	14.24	13.35	8.58
7/1/2009	ALTW.AZ	Hub	LMP	13.8	14.91	14.25	13.36	8.55
7/1/2009	ALTW.BARÉ	Gennode	LMP	13.76	14.86	14.12	13.16	6.65
7/1/2009	ALTW.BARÉ	Gennode	LMP	13.76	14.86	14.12	13.16	6.65
7/1/2009	ALTW.BARÉ	Gennode	LMP	13.76	14.86	14.12	13.16	6.65
7/1/2009	ALTW.BRLC	Gennode	LMP	13.65	14.8	14.39	13.44	7.52
7/1/2009	ALTW.BRLC	Gennode	LMP	13.65	14.8	14.39	13.44	7.52
7/1/2009	ALTW.BRLC	Gennode	LMP	13.65	14.8	14.39	13.44	7.52
7/1/2009	ALTW.BRLC	Gennode	LMP	13.65	14.8	14.39	13.44	7.52
7/1/2009	ALTW.BRLC	Gennode	LMP	13.63	14.77	14.38	13.43	7.5
7/1/2009	ALTW.BRO	Gennode	LMP	13.36	14.44	13.86	13.03	15.12
7/1/2009	ALTW.BVR	Gennode	LMP	13.76	14.88	14.06	13.29	3.92
7/1/2009	ALTW.BVR	Gennode	LMP	13.78	14.9	14.09	13.31	3.91
7/1/2009	ALTW.CBP	Loadzone	LMP	13.94	15.08	14.4	13.46	6.05
7/1/2009	ALTW.CC.E	Gennode	LMP	13.83	14.93	14.27	13.34	6.99
7/1/2009	ALTW.CC.E	Gennode	LMP	13.83	14.93	14.27	13.34	6.99
7/1/2009	ALTW.CC.S	Gennode	LMP	13.62	14.73	14.16	13.24	15.3
7/1/2009	ALTW.CC.S	Gennode	LMP	13.62	14.73	14.16	13.24	15.3
7/1/2009	ALTW.CERF	Gennode	LMP	13.77	14.87	14.22	13.31	7.02
7/1/2009	ALTW.CM	Loadzone	LMP	13.56	14.68	14.2	13.32	7.31
7/1/2009	ALTW.CM	Loadzone	LMP	13.73	14.82	14.31	13.44	7.43
7/1/2009	ALTW.CM	Loadzone	LMP	13.41	14.52	14.01	13.13	7.18
7/1/2009	ALTW.CRYÉ	Gennode	LMP	13.79	14.89	14.18	13.23	6.73
7/1/2009	ALTW.CRYÉ	Gennode	LMP	13.79	14.89	14.18	13.23	6.73
7/1/2009	ALTW.DAE	Gennode	LMP	13.54	14.64	13.91	13.07	5.9
7/1/2009	ALTW.EME	Gennode	LMP	13.83	14.93	14.27	13.34	6.99
7/1/2009	ALTW.EME	Gennode	LMP	13.83	14.93	14.27	13.34	6.99
7/1/2009	ALTW.EME	Gennode	LMP	13.83	14.93	14.27	13.34	6.99
7/1/2009	ALTW.EME	Gennode	LMP	13.83	14.93	14.27	13.34	6.99

7/1/2009	ALTW.END`	Gennode	LMP	13.16	14.25	13.67	12.8	12.11
7/1/2009	ALTW.END`	Gennode	LMP	13.16	14.25	13.67	12.8	12.11
7/1/2009	ALTW.FAIR	Gennode	LMP	13.42	14.51	13.58	12.91	4.89
7/1/2009	ALTW.FAIR	Gennode	LMP	13.42	14.51	13.57	12.91	4.89
7/1/2009	ALTW.FAIR	Gennode	LMP	13.7	14.85	14.28	13.33	7.17
7/1/2009	ALTW.FAIR	Gennode	LMP	13.73	14.88	14.31	13.35	7.2
7/1/2009	ALTW.FAIR	Gennode	LMP	13.73	14.88	14.31	13.35	7.2
7/1/2009	ALTW.FCLE	Gennode	LMP	13.29	14.36	13.75	12.91	13.6
7/1/2009	ALTW.FOXI	Gennode	LMP	13.36	14.49	13.97	13.06	7.02
7/1/2009	ALTW.FOXI	Gennode	LMP	13.36	14.49	13.97	13.06	7.02
7/1/2009	ALTW.FOXI	Gennode	LMP	13.37	14.5	13.97	13.06	7.02
7/1/2009	ALTW.FOXI	Gennode	LMP	13.36	14.49	13.97	13.06	7.02
7/1/2009	ALTW.FPL_	Gennode	LMP	13.54	14.64	13.91	13.07	5.9
7/1/2009	ALTW.GRC`	Gennode	LMP	13.72	14.82	14.17	13.28	8.71
7/1/2009	ALTW.GRC`	Gennode	LMP	13.72	14.82	14.17	13.28	8.71
7/1/2009	ALTW.HAN`	Gennode	LMP	13.66	14.78	14.14	13.25	7.08
7/1/2009	ALTW.HAN`	Gennode	LMP	13.66	14.78	14.14	13.25	7.08
7/1/2009	ALTW.HAN`	Gennode	LMP	13.66	14.78	14.14	13.25	7.08
7/1/2009	ALTW.HCPI	Loadzone	LMP	13.75	14.89	14.33	13.38	7.24
7/1/2009	ALTW.INDY	Gennode	LMP	13.73	14.85	14.15	13.25	5.99
7/1/2009	ALTW.JOU(Gennode	LMP	13.55	14.65	14.1	13.19	15.27
7/1/2009	ALTW.JOU(Gennode	LMP	13.55	14.65	14.1	13.19	15.27
7/1/2009	ALTW.JOUI	Gennode	LMP	13.66	14.78	13.91	13.17	5.37
7/1/2009	ALTW.JOUI	Gennode	LMP	13.66	14.78	13.91	13.17	5.37
7/1/2009	ALTW.JOUI	Gennode	LMP	13.43	14.53	13.99	13.09	15.16
7/1/2009	ALTW.JOUI	Gennode	LMP	13.43	14.53	13.99	13.09	15.16
7/1/2009	ALTW.LAN!	Gennode	LMP	13.47	14.64	14.02	13.07	5.21
7/1/2009	ALTW.LAN!	Gennode	LMP	13.54	14.71	14.09	13.13	5.26
7/1/2009	ALTW.LAN!	Gennode	LMP	13.54	14.71	14.09	13.13	5.26
7/1/2009	ALTW.LIME	Gennode	LMP	13.79	14.9	14.2	13.25	6.79
7/1/2009	ALTW.LIME	Gennode	LMP	13.79	14.9	14.2	13.25	6.79
7/1/2009	ALTW.MEC	Loadzone	LMP	13.56	14.67	14.04	13.16	13.84
7/1/2009	ALTW.MO!	Gennode	LMP	14.16	15.4	14.81	13.74	6.96
7/1/2009	ALTW.MQ(Gennode	LMP	13.82	14.93	14.12	13.33	4.33
7/1/2009	ALTW.MRE	Loadzone	LMP	13.69	14.81	14.26	13.29	7.37
7/1/2009	ALTW.MRE	Hub	LMP	13.77	14.9	14.34	13.35	7.42
7/1/2009	ALTW.MTC	Gennode	LMP	13.65	14.72	14.06	13.18	7.03
7/1/2009	ALTW.MTC	Gennode	LMP	13.65	14.72	14.06	13.18	7.03
7/1/2009	ALTW.MTC	Gennode	LMP	13.65	14.73	14.06	13.18	7.05
7/1/2009	ALTW.NCEI	Gennode	LMP	14.06	15.18	14.6	13.64	15.79
7/1/2009	ALTW.NCEI	Gennode	LMP	14.06	15.18	14.6	13.64	15.79
7/1/2009	ALTW.NSP	Loadzone	LMP	13.81	14.96	14.38	13.4	6.86
7/1/2009	ALTW.NSPI	Hub	LMP	13.81	14.96	14.38	13.4	6.85
7/1/2009	ALTW.ODI!	Gennode	LMP	13.43	14.56	14.12	13.22	7.14
7/1/2009	ALTW.OTTI	Gennode	LMP	13.5	14.61	13.98	13.11	15.19
7/1/2009	ALTW.PION	Gennode	LMP	13.51	14.66	14.02	13.05	5.95
7/1/2009	ALTW.PION	Gennode	LMP	13.51	14.66	14.02	13.05	5.95

7/1/2009	ALTW.PRAI	Gennode	LMP	13.8	14.92	14.17	13.32	6.08
7/1/2009	ALTW.PRAI	Gennode	LMP	13.8	14.91	14.17	13.32	6.08
7/1/2009	ALTW.PRAI	Gennode	LMP	13.8	14.91	14.17	13.32	6.08
7/1/2009	ALTW.PRAI	Gennode	LMP	13.8	14.91	14.17	13.31	6.08
7/1/2009	ALTW.PRES	Gennode	LMP	13.83	14.95	14.22	13.36	4.34
7/1/2009	ALTW.RCC	Gennode	LMP	13.81	14.92	14.17	13.32	6.09
7/1/2009	ALTW.ROQ	Gennode	LMP	13.8	14.89	14.69	13.54	15.79
7/1/2009	ALTW.SLAK	Gennode	LMP	13.62	14.73	14.16	13.24	15.3
7/1/2009	ALTW.SLAK	Gennode	LMP	13.62	14.73	14.16	13.24	15.3
7/1/2009	ALTW.SLAK	Gennode	LMP	13.63	14.73	14.17	13.25	15.31
7/1/2009	ALTW.SLAK	Gennode	LMP	13.63	14.73	14.17	13.25	15.31
7/1/2009	ALTW.SMP	Loadzone	LMP	13.72	14.87	14.29	13.34	7.04
7/1/2009	ALTW.SPR	Gennode	LMP	13.75	14.91	14.29	13.31	5.8
7/1/2009	ALTW.STOI	Gennode	LMP	13.84	14.76	14.03	13.28	8.62
7/1/2009	ALTW.STOI	Gennode	LMP	13.84	14.76	14.03	13.28	8.62
7/1/2009	ALTW.STOI	Gennode	LMP	13.84	14.76	14.03	13.28	8.62
7/1/2009	ALTW.STOI	Gennode	LMP	13.84	14.76	14.03	13.28	8.62
7/1/2009	ALTW.SUTI	Gennode	LMP	13.65	14.72	14.06	13.18	7.03
7/1/2009	ALTW.SUTI	Gennode	LMP	13.65	14.72	14.06	13.18	7.03
7/1/2009	ALTW.SUTI	Gennode	LMP	13.64	14.72	14.06	13.17	7.03
7/1/2009	ALTW.TEA	Hub	LMP	13.72	14.87	14.3	13.34	7.1
7/1/2009	ALTW.TOI	Gennode	LMP	13.7	14.83	14.16	13.19	6.53
7/1/2009	ALTW.TOI	Gennode	LMP	13.7	14.83	14.16	13.19	6.53
7/1/2009	ALTW.TOI	Gennode	LMP	13.7	14.83	14.16	13.19	6.53
7/1/2009	ALTW.UPL	Hub	LMP	13.47	14.58	14.08	13.21	7.23
7/1/2009	ALTW.UPL	Hub	LMP	13.75	14.89	14.33	13.38	7.24
7/1/2009	ALTW.WEL	Gennode	LMP	13.72	14.88	14.27	13.31	6.75
7/1/2009	ALTW.WOI	Gennode	LMP	13.62	14.68	14.06	13.19	7.39
7/1/2009	ALTW.WOF	Gennode	LMP	13.7	14.83	14.16	13.19	6.53
7/1/2009	ALTW.WPP	Loadzone	LMP	13.73	14.85	14.15	13.25	5.99
7/1/2009	ALTW.WPP	Hub	LMP	13.73	14.85	14.15	13.25	5.99
7/1/2009	ALTW.WRT	Loadzone	LMP	13.54	14.65	14.11	13.19	7.29
7/1/2009	ALTW.W_B	Gennode	LMP	13.5	14.62	14.15	13.28	7.29
7/1/2009	ALTW.W_J	Gennode	LMP	13.33	14.39	13.8	12.99	15.07
7/1/2009	AMIL.ACL9	Loadzone	LMP	13.96	13.91	15.13	13.44	10.95
7/1/2009	AMIL.ACP9	Loadzone	LMP	13.96	13.91	15.13	13.44	10.95
7/1/2009	AMIL.AEM.	Loadzone	LMP	13.69	12.02	14.82	12.79	9.63
7/1/2009	AMIL.AEM.	Loadzone	LMP	13.93	13.77	15.11	13.39	10.77
7/1/2009	AMIL.AEM.	Loadzone	LMP	13.93	13.77	15.11	13.39	10.77
7/1/2009	AMIL.AEM.	Loadzone	LMP	14.26	15.41	15.18	14.02	16.35
7/1/2009	AMIL.AEM.	Loadzone	LMP	13.8	14.9	14.21	13.36	8.12
7/1/2009	AMIL.AEM.	Loadzone	LMP	13.96	13.91	15.13	13.44	10.95
7/1/2009	AMIL.AIP9	Loadzone	LMP	13.96	13.91	15.13	13.44	10.95
7/1/2009	AMIL.AIU1	Loadzone	LMP	13.93	13.77	15.11	13.39	10.77
7/1/2009	AMIL.AIU3	Loadzone	LMP	13.93	13.77	15.11	13.39	10.76
7/1/2009	AMIL.AIU4	Loadzone	LMP	13.93	13.77	15.11	13.39	10.77
7/1/2009	AMIL.AIU5	Loadzone	LMP	13.93	13.77	15.11	13.39	10.77