

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

Application of Big Rivers Electric )  
Corporation for a General ) Case No. 2013-00199  
Adjustment In Rates )

**MOTION FOR DEVIATION**

Pursuant to 807 KAR 5:001 Section 21, Big Rivers Electric Corporation (“Big Rivers”) hereby moves the Kentucky Public Service Commission (the “Commission”) for deviation from : (i) the requirement in 807 KAR 5:001 Section 7 that Big Rivers file a hard copy original and ten paper copies of its responses to certain data requests; and (ii) the requirement in 807 KAR 5:001 Section 13 that Big Rivers file a highlighted hard copy and ten redacted hard copies of material containing confidential information submitted pursuant to a petition for confidential treatment.

Big Rivers is filing with this motion its responses to the requests for information from the hearing in this matter. Except as described below, Big Rivers’ responses contain a hardcopy original and ten paper copies of its narrative responses and all attachments.

Big Rivers is filing the attachments to its response to Items 8, 12, and 13 of the post-hearing requests for information electronically because if printed, the attachment to Item 8 would be 282 pages, the attachment to Item 12 would be 137 pages, and the attachment to Item 13 would be 166 pages. One hard copy of these attachments is being filed with the Commission.

Big Rivers is filing the attachments to its responses to Items 16 and 20 of the post-hearing requests for information electronically because the questions requested the attachment electronically or the attachment is an electronic spreadsheet designed for electronic viewing.

These files are being provided under a petition for confidential treatment, and they have been served on all parties that have signed a confidentiality agreement.

The pervasive nature of the confidential information makes the production of ten redacted, public versions of these documents ineffectual and unhelpful to the Commission, the parties, and the public. As such, Big Rivers has not produced a redacted, public version of these documents that have been produced confidentially in electronic format.

WHEREFORE, Big Rivers respectfully requests that the Commission enter an order granting Big Rivers deviation from 807 KAR 5:001 Sections 7 and 13 to: (i) produce the attachments to Items 8, 16, and 20 in electronic format; and (ii) omit PUBLIC, redacted copies of the CONFIDENTIAL attachments.

On this the 23<sup>rd</sup> day of January, 2014.

Respectfully submitted,



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*Counsel for Big Rivers Electric Corporation*

**Certificate of Service**

I certify that a true and accurate copy of the foregoing was served by Federal Express or by first class mail upon the persons listed on the accompanying service list, on or before the date this motion is filed with the Kentucky Public Service Commission.

On this the 23<sup>rd</sup> day of January, 2014.

*BJL*

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*Counsel for Big Rivers Electric Corporation*