

1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION

JUL 16 20

PUBLIC SERVICE
COMMISSION

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4 In the Matter of:

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6 SPECIAL CONTRACT FILING)
7 BY BIG RIVERS ELECTRIC) CASE NO. 2014-00134
8 CORPORATION PURSUANT TO)
9 807 KAR 5:011 §13)

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12 **MOTION FOR DEVIATION**

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14 Pursuant to 807 KAR 5:001 Section 22, Big Rivers Electric Corporation (“Big Rivers”)
15 hereby moves the Kentucky Public Service Commission (the “Commission”) for deviation from:
16 the requirement in 807 KAR 5:001 Section 13 that Big Rivers file a highlighted hard copy and
17 ten redacted hard copies of material containing confidential information submitted pursuant to a
18 petition for confidential treatment.

19 Big Rivers is filing with this motion its responses to the Initial Requests for Information
20 of the Office of the Attorney General (“AG”) and Kentucky Industrial Utility Customers, Inc.
21 (“KIUC”). Big Rivers has produced the attachments to Item 12 of the AG’s Initial Request for
22 Information and Items 4, 7, 8, and 10 of KIUC’s Initial Request for Information in electronic
23 format on the CONFIDENTIAL electronic media filed with this motion. These files have been
24 produced electronically for one or more of three reasons: (i) if printed, the files would be
25 approximately one hundred (100) pages or more and would overburden the paper record in this
26 matter; (ii) the files are designed for electronic viewing or contain information, such as formulas,
27 only viewable in electronic format; and/or (iii) the files were requested electronically in the
28 corresponding data request.

29 Additionally, the pervasive nature of the confidential information makes the production
30 of ten redacted, public versions of these documents ineffectual and unhelpful to the Commission,

1 the parties, and the public. Big Rivers has not produced a redacted, public version of these
2 documents that have been produced confidentially in electronic format.

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

6 On this the 15th day of July, 2014.

7 Respectfully submitted,

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11 _____
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23 *Counsel for Big Rivers Electric Corporation*

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26 **Certificate of Service**

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28 I certify that a true and accurate copy of the foregoing was or will be served by regular
29 mail, by Federal Express, or by hand delivery upon the persons listed on the accompanying
30 service list, on or before the date the foregoing is filed with the Kentucky Public Service
31 Commission.

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33 On this the 15th day of July, 2014,

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38 Counsel for Big Rivers Electric Corporation