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July 1, 2014

Via Federal Express

Ms. Stephanie Bell  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

RECEIVED

JUL 02 2014

PUBLIC SERVICE  
COMMISSION

RE: *PROPOSED AMENDMENTS TO 807 KAR 5:001 §4(8)*

Dear Ms. Bell:

This letter is written to provide comments on the proposal of the Public Service Commission to amend 807 KAR 5:001 §4(8) to eliminate service by United States mail or overnight courier as one of the available options for a party in a case to serve a paper on another party. The regulation is not clear that service by overnight courier service is considered service by "mail" for purposes of the regulation, but that is the clear inference and our assumption.

Our client, Big Rivers Electric Corporation ("Big Rivers") estimates that more time will be required for preparation to serve a large filing by electronic mail. For example, scanning of a large data request response like what Big Rivers frequently files cannot begin until the entire response is complete. This will require that a filing be completed significantly earlier than otherwise required to permit time for scanning documents for service.

The maximum size of an electronic mail attachment that will be accepted by a recipient's electronic mail server can vary considerably from person to person. We have observed, for example, that the maximum file size the Commission can accept in its electronic filing system is much larger than the maximum file size it can receive through regular electronic mail.

Almost any significant filing served by electronic mail would have to be broken up into files smaller than the most restrictive maximum

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attachment size permitted by the electronic mail system of any party in a case. Some very large files are much easier to provide by copying on flash drive storage devices or compact disks that can be delivered or overnight courier to the other parties in a proceeding. The dimensions of certain documents, such as maps, prevent them from being served by electronic mail. If the proposed amendment is approved, we would expect that almost every major filing in a proceeding will be accompanied by a motion for permission to deviate from the regulation for certain portions of the information in the filing.

We will comply with whatever requirements are made by the Commission for service on parties, of course. But in the absence of a compelling reason to make the proposed changes, we would like to go on record as preferring retention of the current options for service by a party on other parties.

Sincerely yours,

A handwritten signature in blue ink that reads "James M. Miller". The signature is written in a cursive style with a large initial "J".

James M. Miller

Counsel for Big Rivers Electric Corporation

JMM/lm

cc. Billie Richert  
DeAnna Speed