

Hinton, Daniel E (PSC)

From: Wuetcher, Jerry (PSC)
Sent: Tuesday, August 21, 2012 10:12 AM
To: Hinton, Daniel E (PSC); Kirtley, Brent (PSC)
Subject: FW: Notice of Intent to Attend August 27 Hearing; Comment - PLS PASS ALONG TO GERALD WUETCHER

Importance: High

[Add to comment file.](#)

From: Rogness, John (PSC)
Sent: Tuesday, August 21, 2012 9:17 AM
To: Wuetcher, Jerry (PSC)
Subject: FW: Notice of Intent to Attend August 27 Hearing; Comment - PLS PASS ALONG TO GERALD WUETCHER
Importance: High

Jerry,

I'm passing this along from Roger Hickman from Big Rivers.

John A. Rogness III Ph.D.
Financial Analysis Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601
502-564-3940 ext. 229
John.rogness@ky.gov

From: Roger Hickman [<mailto:Roger.Hickman@bigrivers.com>]
Sent: Monday, August 20, 2012 5:02 PM
To: Rogness, John (PSC); Newby, Daryl E (PSC)
Cc: Albert Yockey; John Talbert
Subject: Notice of Intent to Attend August 27 Hearing; Comment - PLS PASS ALONG TO GERALD WUETCHER
Importance: High

Dear Jerry –

For some reason I have misplaced your e-mail address.

First, please be advised that I plan on attending the Hearing scheduled for 9 AM EDT, August 27, in Hearing Room 1 of the Commission's Offices in Frankfort. I plan on making no comments at that hearing.

Second, I do submit the following comment and observation about the Rules of Procedure 807 KAR 5:001. This comment was brought into the light given a recent filing which Big Rivers made at the Commission pursuant to a Commission Order. As I read the amended Rules of Procedures, an applicant will have one of two options when filing an application –

1. File a hardcopy of the Application and all discovery, motions, etc., as before, or
2. Notify the Commission of the Applicant's intent to use electronic filing.

Given our recent filing – a Commission request to provide hardcopies of records previously filed on electronic media (CD), I believe the hardcopy application/discovery process should incorporate an option to file attachments on electronic media so long as that attachment is readily searchable, e.g., a Word file, an Excel file, an Acrobat file. In our recent filing, we provided hardcopies of e-mails which had been earlier requested. Certain attachments to these e-mails were never intended for printing hardcopy. They, primarily Excel files, were developed with the objective of running forecast scenarios. Print Previews of these files showed printouts exceeding 1500 pages, in most cases exceeding 6000 pages, and, in one instance, exceeding 325,000 pages. Needless to say, providing any of this information in hardcopy would be unnecessarily laborious, and an unnecessary waste of paper.

Some of this quandary revolves around the definition of 'voluminous'. For the Applicant, an attachment which is 200 pages could be considered voluminous since reproducing 50 copies of this document would consume 10,000 sheets of paper, i.e., 20 reams of paper or 2 full boxes of normal 8-1/2x11 paper stock.

Therefore, there needs to be an option within the rules for Applicants to provide information (particularly attachments) on electronic media - CD or Flash Drives – when that information is readily searchable in the format in which it is filed – Word, Excel, or Acrobat. The Commission's rules should allow this without the Applicant's filing of a Motion for Deviation.

Should you have any questions about this comment, please do not hesitate to contact me.

Sincerely,

Roger

Roger Hickman
Regulatory Affairs Manager
Big Rivers Electric Corporation
Phone: 270-844-6182 (O)
E-Mail: roger.hickman@bigrivers.com

The information contained in this transmission is intended only for the person or entity to which it is directly addressed or copied. It may contain material of confidential and/or private nature. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is not allowed. If you receive this message and the information contained therein by error, please contact the sender and delete the material from your/any storage medium.