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Jeff DeRouen, Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

July 25, 2011

RE: *In the Matter of: The Application of Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Approval of Its 2011 Compliance Plan for Recovery by Environmental Surcharge - Case No. 2011-00162*

Dear Mr. DeRouen:

Enclosed please find and accept for filing the original and fifteen (15) copies of Louisville Gas and Electric Company's Motion to Deviate from Requirement Governing Filing of Copies in the above-referenced matter.

Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the attached additional copies. Please do not hesitate to contact the undersigned should you have any questions.

Sincerely,

Robert M. Conroy

cc: Parties of Record

RECEIVED

JUL 25 2011

PUBLIC SERVICE
COMMISSION

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR CERTIFICATES)
OF PUBLIC CONVENIENCE AND NECESSITY) CASE NO. 2011-00162
AND APPROVAL OF ITS 2011 COMPLIANCE)
PLAN FOR RECOVERY BY)
ENVIRONMENTAL SURCHARGE)

MOTION OF LOUISVILLE GAS AND ELECTRIC COMPANY TO DEVIATE FROM
REQUIREMENT GOVERNING FILING OF COPIES

Louisville Gas and Electric Company (“LG&E”) by counsel, petitions the Kentucky Public Service Commission (“Commission”) to grant LG&E approval, pursuant to 807 KAR 5:001, Section 14 to deviate from the requirement that parties file and original and fifteen (15) complete copies of all data responses and attachments. LG&E requests that it be excused from filing any paper copies of certain of its responses and attachments due to the fact that such responses and attachments are unduly voluminous. In support of its Motion, LG&E states as follows:

1. Pursuant to Commission’s June 28, 2011 Order, LG&E must provide an original and fifteen (15) copies of all data responses and attachments to the Commission, along with a service copy to all parties of record. Certain of the responses and attachments to the responses are voluminous. Due to the voluminous nature of certain of the responses and attachments, LG&E is requesting permission to file only electronic copies on compact disc of the responses and attachments.

2. In response to request No. 10 from the KIUC, LG&E is providing four documents that total 170 pages. In providing the Commission’s fifteen copies, LG&E would have to

provide 2,550 pages. This number will increase greatly when the service copies are likewise considered.

3. In response to request No. 16(c) from the KIUC, LG&E is providing six documents that total 207 pages. In providing the Commission's fifteen copies, LG&E would have to provide 3,105 pages. This number will increase greatly when the service copies are likewise considered.

4. In response to Metropolitan Housing Coalition request No. 6, LG&E is providing copies of several presentations, reports, and other documents that cumulatively are quite voluminous. Providing the material on compact disc will not only eliminate the need for the voluminous paper copies, but will increase the ease of the reader in reviewing the presentations.

5. In response to request No. 17(b) from Commission Staff, LG&E is providing a document that totals 92 pages. In providing the Commission's fifteen copies, LG&E would have to provide 1,380 pages. This number will increase greatly when the service copies are likewise considered.

6. In response to request No. 32(h) from Commission Staff, LG&E is providing three documents that total 457 pages. In providing the Commission's fifteen copies, LG&E would have to provide 6,855 pages. This number will increase greatly when the service copies are likewise considered.

7. In response to request No. 32(i) from Commission Staff, LG&E is providing three documents that total 96 pages. In providing the Commission's fifteen copies, LG&E would have to provide 1,440 pages. This number will increase greatly when the service copies are likewise considered.

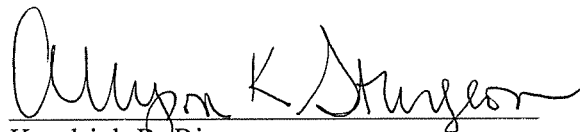
8. In response to request No. 53(a) from Commission Staff, LG&E is providing as an attachment the EPA's Regulatory Impact Analysis of the Proposed Toxics Rule: Final Rule, which is 469 pages. The pertinent excerpt from the Report is attached to the response in paper form. In providing the Commission fifteen copies of the entire report, LG&E would have to provide 7,035 pages. This number will increase greatly when the service copies are likewise considered.

9. Due to the voluminous nature of these documents, LG&E requests permission pursuant to 807 KAR 5:001, Section 14 from the Commission's June 28, 2011 Order and provide the Commission's fifteen copies electronically. LG&E also seeks permission to provide service copies to the other parties to the proceeding electronically, as well.

WHEREFORE, LG&E requests deviation from the requirement that parties provide an original and fifteen (15) paper copies of data responses. LG&E requests that it be allowed to instead submit the responses and attachments identified above on compact disc in compliance with this requirement.

Dated: July 25, 2011

Respectfully submitted,



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Counsel for Louisville Gas and Electric Company

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Response was served via U.S. mail, first-class, postage prepaid, this 25th day of July 2011 upon the following persons:

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