

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC)
COMPANY FOR AN AMENDED ENVIRONMENTAL)
COMPLIANCE PLAN, A REVISED SURCHARGE TO)
RECOVER COSTS, AND CERTIFICATES OF PUBLIC)
CONVENIENCE AND NECESSITY FOR THE)
CONSTRUCTION OF NECESSARY)
ENVIRONMENTAL EQUIPMENT)

CASE NO. 2011-00162

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OCT 13 2011

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY)
FOR CERTIFICATES OF PUBLIC CONVENIENCE)
AND NECESSITY AND APPROVAL OF ITS 2011)
COMPLIANCE PLAN FOR RECOVERY)
BY ENVIRONMENTAL SURCHARGE)

PUBLIC SERVICE
COMMISSION

CASE NO. 2011-00161

JOINT MOTION BY SIERRA CLUB AND NATURAL RESOURCES DEFENSE
COUNCIL TO DEVIATE FROM RULE

Sierra Club and Natural Resources Defense Council's (collectively "Environmental Intervenors") move the Kentucky Public Service Commission ("Commission"), pursuant to 807 KAR 5:001 § 14, to deviate from the requirement that parties file with the Commission an original and fifteen (15) complete copies of all data responses and attachments with regard to the September 30, 2011 Data Requests by Louisville Gas and Electric Company and Kentucky Utilities Company (collectively, the "Companies") and allow the Environmental Intervenors to instead produce the data responses and supporting attachment on DVD. Environmental Intervenors also seek permission to file service copies of the data responses and supporting attachments via DVD to all parties.

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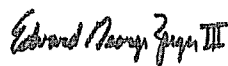
In support of this joint motion, Environmental Intervenors state as follows:

1. Environmental Intervenors are filing a large number of data files and other documents in response to the Companies' September 30, 2011 Data Request, totaling thousands of pages.
2. Many of these data files, in paper form, are of little, if any, practical use to the Commission or the Companies, which is why the Companies asked the Environmental Intervenors to produce them in "machine readable or txt format."
3. Environmental Intervenors have filed an original and fifteen (15) complete copies of all of the written (non-data) responses to the Companies questions to which these data files relate.
4. Environmental Intervenors will file one complete hard copy of the data responses and attachments which relate to this September 30, 2011 Data Request within seven days.

WHEREFORE, Environmental Intervenors respectfully request permission to deviate from the rules and the Commission's June 28, 2011 Order to provide an original and fifteen (15) paper copies of data responses and instead allow Environmental Intervenors to submit the data responses and attachments, including service copies, on DVD.

Dated: October 13, 2011

Respectfully submitted,



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Dated: October 13, 2011

CERTIFICATE OF SERVICE

I certify that I mailed a copy of this Petition to Deviate by first class mail on October 13, 2011 to the following:

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