

1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY
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JUN 24 2013

PUBLIC SERVICE
COMMISSION

5 In the Matter of:

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7 Application of Big Rivers Electric)
8 Corporation for a General) Case No. 2012-00535
9 Adjustment in Rates)
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12 **BIG RIVERS ELECTRIC CORPORATION'S MOTION FOR DEVIATION**

13 Pursuant to 807 KAR 5:001 Section 21, Big Rivers Electric Corporation ("Big Rivers")
14 hereby moves the Kentucky Public Service Commission ("Commission") for a deviation from (i)
15 the requirement that Big Rivers file a hard copy original and ten paper copies of its responses
16 to certain data requests, and (ii) the requirement in 807 KAR 5:001 Section 13 that Big Rivers
17 file a highlighted hard copy and ten redacted hard copies of material containing confidential
18 information submitted under a petition for confidential treatment. Big Rivers is filing with this
19 motion its revised responses to certain of Ben Taylor and the Sierra Club's Supplemental
20 Requests for Information ("Sierra Club Supplemental Requests"). Big Rivers' responses contain
21 a hardcopy original and ten paper copies of its narrative responses, but the attachments to those
22 responses are provided only electronically (the "Electronic Attachments"). Each Electronic
23 Attachment is provided on a CONFIDENTIAL CD filed under a petition for confidential
24 treatment.

25 The Electronic Attachments are provided in response to the Sierra Club Supplemental
26 Requests that seek modeling runs. The modeling runs consist of spreadsheets or other electronic
27 documents that cannot readily be provided in hard copy because they are designed for viewing
28 on a computer and, if printed, would be voluminous or extremely difficult to read, or would lose
29 critical information (such as formulas stored in Excel spreadsheets). As such, Big Rivers is

1 providing these attachments in electronic format only. Also, as noted in Big Rivers' petition for
2 confidential treatment, the Electronic Attachments are being redacted in their entirety because
3 they are spreadsheets and Big Rivers cannot disaggregate the confidential material from those
4 files without making other cells in the spreadsheet unusable.

5 WHEREFORE, Big Rivers respectfully requests that the Commission enter an order
6 granting a deviation to Big Rivers from (i) the requirement to file paper copies of the attachments
7 to its responses to the Sierra Club Supplemental Requests, and (ii) the requirement in 807 KAR
8 5:001 Section 13 that Big Rivers file a highlighted hard copy and ten redacted hard copies of
9 material containing confidential information submitted under a petition for confidential
10 treatment.

11 On this the 21st day of June, 2013.

12 Respectfully submitted,

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Certificate of Service

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I certify that a true and accurate copy of the foregoing was served by Federal Express or by first class mail, postage prepaid upon the persons listed on the service list that accompanies this petition, on this the 21st day of June, 2013.



Tyson Kamuf