

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

Application of Big Rivers Electric )  
Corporation for a General ) Case No. 2012-00535  
Adjustment In Rates )

**MOTION FOR DEVIATION**

Pursuant to 807 KAR 5:001 Section 21, Big Rivers Electric Corporation (“Big Rivers”) hereby moves the Kentucky Public Service Commission (the “Commission”), for good cause shown, for deviation from: (i) the requirement in 807 KAR 5:001 Section 7 that Big Rivers file a hard copy original and ten paper copies of its responses to certain data requests; and (ii) the requirement in 807 KAR 5:001 Section 13 that Big Rivers file a highlighted hard copy and ten redacted hard copies of material containing confidential information submitted pursuant to a petition for confidential treatment.

Big Rivers is filing with this motion its responses to the Joint Intervenors’ Initial Rehearing Request for Information. Except as described below, Big Rivers’ responses contain a hardcopy original and ten paper copies of its narrative responses and all attachments.

Big Rivers has produced the attachments to its responses to Items 1 and 15 of the Joint Intervenors’ Initial Rehearing Request for Information electronically because if printed, the documents would be over one hundred (100) pages and would overburden the paper record in this matter. These attachment are being filed under a petition for confidential treatment and are produced electronically on the CONFIDENTIAL electronic media filed with this motion. These CONFIDENTIAL electronic files have been served on all parties that have signed a confidentiality agreement. The pervasive nature of the confidential information makes the

production of ten redacted, public versions of these documents ineffectual and unhelpful to the Commission, the parties, and the public. Big Rivers has not produced a redacted, public version of these documents that have been produced confidentially in electronic format.

WHEREFORE, Big Rivers respectfully requests that the Commission enter an order granting Big Rivers deviation from 807 KAR 5:001 Sections 7 and 13 in order to: (i) produce the attachments identified above in electronic format; and (ii) omit PUBLIC, redacted copies of those attachments.

On this the 24<sup>th</sup> day of January, 2014

Respectfully submitted,



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*Counsel for Big Rivers Electric Corporation*

**Certificate of Service**

I certify that a true and accurate copy of the foregoing was or will be served by Federal Express or by first class mail upon the persons listed on the accompanying service list, on or before the date this motion is filed with the Kentucky Public Service Commission.

On this the 24<sup>th</sup> day of January, 2014,

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*Counsel for Big Rivers Electric Corporation*