

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

Application of Big Rivers Electric)
Corporation for a General) Case No. 2013-00199
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 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 revised responses to the Initial Requests for Information of the Office of the Attorney General (“AG”). Except as described below, Big Rivers’ responses contain a hardcopy original and ten paper copies of its narrative responses and all attachments.

Big Rivers is filing the attachments to its revised responses to Items 196 and 202 of the AG’s Initial Requests for Information (“AG 1-196” and “AG 1-202”) electronically because the questions requested computations. These files are being provided under a petition for confidential treatment, and they 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. As such, 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 to: (i) produce the attachments to the revised responses to AG 1-196 and AG 1-202 in electronic format; and (ii) omit PUBLIC, redacted copies of those CONFIDENTIAL attachments.

On this the 18th day of October, 2013.

Respectfully submitted,



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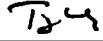
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Counsel for Big Rivers Electric Corporation

Certificate of Service

I certify that a true and accurate copy of the foregoing was or will be served by Federal Express or by hand delivery 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 18th day of October, 2013,



Counsel for Big Rivers Electric Corporation