JUL 2 6 2018

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

3 In the matter of:

1

2

4

NOTICE OF TERMINATION OF)	
CONTRACTS AND APPLICATION OF BIG)	
RIVERS ELECTRIC CORPORATION FOR A)	Case No.
DECLARATORY ORDER AND FOR)	2018-00146
AUTHORITY TO ESTABLISH A)	
REGULATORY ASSET)	

MOTION FOR DEVIATION

- 5 1. Big Rivers Electric Corporation ("Big Rivers") hereby moves the
- 6 Kentucky Public Service Commission ("Commission") for a deviation from the
- 7 requirement in 807 KAR 5:001 Section 7(1) that Big Rivers file an original and ten
- 8 paper copies of all papers filed with the Commission and the requirement in 807
- 9 KAR 5:001 Section 13(2)(a)(3) that Big Rivers file one paper copy of material
- 10 containing confidential information submitted under a petition for confidential
- 11 treatment.
- 12 2. Except as noted herein, Big Rivers is filing with this motion a paper
- original and ten paper copies of its responses to the Second Request for Information
- of Kentucky Industrial Utility Customers, Inc. ("KIUC"), including all attachments
- 15 to those responses.
- 16 3. Item 4 of KIUC's Second Request for Information ("KIUC 2-4") asks for
- 17 a copy of all of Big Rivers' existing loan documents. These documents are
- 18 voluminous. If printed, these documents would exceed 900 pages. As such, Big
- 19 Rivers requests a deviation from the requirement that it file an original and ten

1 paper copies of these documents. Big Rivers is providing one paper copy of these

2 documents for the Commission. Big Rivers is also providing an original and ten

electronic copies of these documents to the Commission and an electronic copy to

each party on the PUBLIC CDs or other electronic media accompanying this

5 motion.

3

4

8

9

10

12

13

14

15

16

17

6 4. Item 7 of KIUC's Second Request for Information ("KIUC 2-7") asks

7 that the documents provided in response to that question be provided in Excel

spreadsheet format with all formulas intact. As such, Big Rivers is providing the

attachments to its response to KIUC 2-7 electronically, in Excel format, as

requested. In the accompanying petition for confidential treatment, Big Rivers

11 seeks confidential treatment for the entirety of these documents. Additionally,

three of the Excel spreadsheets are financial forecast model runs, which if printed,

would exceed 500 pages each. As such, Big Rivers requests a deviation from the

requirement to provide a confidential paper copy of these documents.

WHEREFORE, Big Rivers respectfully requests that the Commission enter

an order granting a deviation to Big Rivers from the above requirements.

On this the 26th day of July, 2018.

18

19

20

1	Respectfully submitted,
2	
3	STEP.
4	1801
5	Laura Chambliss
6	Tyson Kamuf
7	Big Rivers Electric Corporation
8	201 Third Street
9	P.O. Box 727
10	Henderson, Kentucky 42419-0024
11	Phone: (270) 827-2561
12	Facsimile: (270) 827-1201
13	laura.chambliss@bigrivers.com
14	tyson.kamuf@bigrivers.com
15	•
16	James M. Miller
17	SULLIVAN MOUNTJOY, PSC
18	100 St. Ann Street
19	P. O. Box 727
20	Owensboro, Kentucky 42302-0727
21	Phone: (270) 926-4000
22	Facsimile: (270) 683-6694
23	jmiller@smsmlaw.com
24	
25	Norman T. Funk
26	Thomas J. Costakis
27	KRIEG DEVAULT LLP
28	One Indiana Square, Suite 2800
29	Indianapolis, Indiana 46204-2079
30	Phone: (317) 636-4341
31	Facsimile: (317) 636-1507
32	tfunk@kdlegal.com
33	tcostakis@kdlegal.com
34	
35	Counsel for Big Rivers Electric
36	Corporation
37	F