

MAR 17 2020<sup>AH</sup>

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**PUBLIC SERVICE  
COMMISSION**

**IN THE MATTER OF:**

<b>APPLICATION OF BIG RIVERS</b>	)	
<b>ELECTRIC CORPORATION FOR</b>	)	<b>CASE NO. 2019-00269</b>
<b>ENFORCEMENT OF RATE AND</b>	)	
<b>SERVICE STANDARDS</b>	)	

**CITY OF HENDERSON, KENTUCKY  
AND HENDERSON UTILITY COMMISSION, d/b/a  
HENDERSON MUNICIPAL POWER & LIGHT'S MOTION TO  
CONVERT CASE TO ALLOW FOR ELECTRONIC FILING PROCEDURES**

The City of Henderson, Kentucky, and the Henderson Utility Commission, d/b/a Henderson Municipal Power & Light (jointly referenced hereinafter as "Henderson"), by counsel, and pursuant to 807 KAR 5:001, Section 8, hereby move the Kentucky Public Service Commission to convert the above-styled case to an electronic case. In support of this Motion, Henderson states as follows:

1. Henderson and the undersigned counsel have reviewed the electronic filing procedures regulation and are capable of sending and receiving electronic transmissions.
2. Big Rivers is capable of sending and receiving electronic transmissions, as evidenced by its inclusion of electronic mail addresses in the signature line of its application and its practice of serving courtesy copies of pleadings filed in this action upon Henderson via electronic mail.
3. Neither party will be adversely affected by converting the case so as to implement electronic filing procedures.

4. An electronic case provides for a more efficient filing process through reduced costs of compliance and additional filing time and the conversion to an electronic case aligns with the Commission's current preference for electronic filing procedures.

**WHEREFORE**, Henderson respectfully moves that the Commission grant its request and convert this case to an electronic case for the reasons specified herein.

Respectfully submitted,

/s/John N. Hughes (w/permission)  
Hon. John N. Hughes  
Attorney at Law  
Professional Service Corporation  
124 West Todd Street  
Frankfort, Kentucky 40601  
Telephone: (502) 227-7270  
[jnhughes@johnnhughespcc.com](mailto:jnhughes@johnnhughespcc.com)

and

/s/Sharon W. Farmer  
Hon H. Randall Redding  
Hon. Sharon W. Farmer  
King, Deep & Branaman  
127 North Main Street, P.O. Box 43  
Henderson, Kentucky 42419-0043  
Telephone: (270) 827-1852  
[rredding@kdbl.com](mailto:rredding@kdbl.com)  
[sfarmer@kdbl.com](mailto:sfarmer@kdbl.com)

*Attorneys for Henderson Utility Commission, d/b/a  
Henderson Municipal Power & Light*

/s/Dawn Kelsey (w/permission)  
Hon. Dawn Kelsey  
City Attorney  
City of Henderson  
222 First Street  
Henderson, Kentucky 42420  
[dkelsey@cityofhendersonky.org](mailto:dkelsey@cityofhendersonky.org)  
*Attorney for City of Henderson*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was forwarded this 17th day of March, 2020, via U.S. Mail, postage prepaid, or via facsimile, electronic mail, and/or hand delivery, to the following:

Tyson Kamuf  
Big Rivers Electric Corp.  
201 Third Street, P.O. Box 727  
Henderson, Kentucky 42419-0024  
[tyson.kamuf@bigrivers.com](mailto:tyson.kamuf@bigrivers.com)  
[laura.chambliss@bigrivers.com](mailto:laura.chambliss@bigrivers.com)

Michael L. Kurtz  
Kurt J. Boehm  
Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)  
[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

*Attorneys for Big Rivers Electric Corp.*

Clay Larkin  
Bingham Greenebaum Doll LLP  
3500 National City Tower  
101 South Fifth Street  
Louisville, Kentucky 40202  
*Attorney for Henderson Utility Commission  
d/b/a Henderson Municipal Power & Light*

Original to:

Kent Chandler  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard, P.O. Box 615  
Frankfort, Kentucky 40602-0615

/s/Sharon W. Farmer