

Jeff DeRouen, Executive Director Public Service Commission of Kentucky 211 Sower Boulevard P. O. Box 615 Frankfort, Kentucky 40602

July 25, 2011

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PUBLIC SERVICE

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Robert M. Conroy Director - Rates T 502-627-3324 F 502-627-3213 robert.conroy@lge-ku.com

RE: The Application of Kentucky Utilities Company for Certificates of Public Convenience and Necessity and Approval of Its 2011 Compliance Plan for Recovery by Environmental Surcharge Case No. 2011-00161

Dear Mr. DeRouen:

Enclosed please find and accept for filing the original and fifteen (15) copies of Kentucky Utilities Company's Motion to Deviate from Requirement Governing Filing of Copies in the above-referenced matter.

Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the attached additional copies. Please do not hesitate to contact the undersigned should you have any questions.

Sincerely,

Robert M. Conroy

cc: Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	CASE NO. 2011-00161
AND APPROVAL OF ITS 2011 COMPLIANCE)	
PLAN FOR RECOVERY BY)	
ENVIRONMENTAL SURCHARGE)	

MOTION OF KENTUCKY UTILITIES COMPANY TO DEVIATE FROM REQUIREMENT GOVERNING FILING OF COPIES

Kentucky Utilities Company ("KU") by counsel, petitions the Kentucky Public Service Commission ("Commission") to grant KU approval, pursuant to 807 KAR 5:001, Section 14 to deviate from the requirement that parties file and original and fifteen (15) complete copies of all data responses and attachments. KU requests that it be excused from filing any paper copies of certain of its responses and attachments due to the fact that such responses and attachments are unduly voluminous. In support of its Motion, KU states as follows:

- 1. Pursuant to Commission's June 28, 2011 Order, KU must provide an original and fifteen (15) copies of all data responses and attachments to the Commission, along with a service copy to all parties of record. Certain of the responses and attachments to the responses are voluminous. Due to the voluminous nature of certain of the responses and attachments, KU is requesting permission to file only electronic copies on compact disc of the responses and attachments.
- 2. In response to request No. 9 from the KIUC, KU is providing four documents that total 301 pages. In providing the Commission's fifteen copies, KU would have to provide 4,515 pages. This number will increase greatly when the service copies are likewise considered.

- 3. In response to request No. 15(c) from the KIUC, KU is providing six documents that total 207 pages. In providing the Commission's fifteen copies, KU would have to provide 3,105 pages. This number will increase greatly when the service copies are likewise considered.
- 4. In response to request No. 19(b) from Commission Staff, KU is providing a document that totals 92 pages. In providing the Commission's fifteen copies, KU would have to provide 1,380 pages. This number will increase greatly when the service copies are likewise considered.
- 5. In response to request No. 32(h) from Commission Staff, KU is providing three documents that total 457 pages. In providing the Commission's fifteen copies, KU would have to provide 6,855 pages. This number will increase greatly when the service copies are likewise considered.
- 6. In response to request No. 32(i) from Commission Staff, KU is providing five documents that total 203 pages. In providing the Commission's fifteen copies, KU would have to provide 3,045 pages. This number will increase greatly when the service copies are likewise considered.
- 7. Due to the voluminous nature of these documents, KU requests permission pursuant to 807 KAR 5:001, Section 14 from the Commission's June 28, 2011 Order and provide the Commission's fifteen copies electronically. KU also seeks permission to provide service copies to the other parties to the proceeding electronically, as well.

WHEREFORE, KU requests deviation from the requirement that parties provide an original and fifteen (15) paper copies of data responses. KU requests that it be allowed to instead submit the responses and attachments identified above on compact disc in compliance with this requirement.

Dated: July 25, 2011

Respectfully submitted,

Kendrick R. Riggs W. Duncan Crosby III Monica H. Braun

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Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Response was served via U.S. mail, first-class, postage prepaid, this 25th day of July 2011 upon the following persons:

Dennis G. Howard II Lawrence W. Cook Assistant Attorneys General Office of the Attorney General Office of Rate Intervention 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

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Counsel for Kentucky Utilities Company