

1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

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5 In the Matter of:

JUL 06 2012

PUBLIC SERVICE
COMMISSION

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7 Application of Big Rivers Electric Corporation)
8 for Approval of its 2012 Environmental)
9 Compliance Plan, for Approval of its Amended)
10 Environmental Cost Recovery Surcharge Tariff,)
11 for Certificates of Public Convenience and)
12 Necessity, and for Authority to Establish a)
13 Regulatory Account)

Case No. 2012-00063

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16 **MOTION FOR DEVIATION**

17 Big Rivers Electric Corporation ("Big Rivers") hereby moves the Kentucky Public
18 Service Commission ("Commission") for a deviation from the requirement in the Commission
19 Staff's June 22, 2012, Second Request for Information in this matter requiring that a hardcopy
20 original and ten paper copies of responses to requests for information be filed with the
21 Commission. Big Rivers is filing with this motion a hardcopy original and ten paper copies of its
22 responses to the Commission Staff's second request for information, Kentucky Industrial Utility
23 Customers, Inc.'s ("KIUC") second request for information, the Attorney General's second
24 request for information, and Sierra Club's second request for information, except that certain of
25 the attachments to the following responses are provided electronically on a USB drive attached
26 to the original and each copy of the responses or on a CONFIDENTIAL USB drive filed under a
27 petition for confidential treatment:

- 28 a. Item 6 of the Commission Staff's second request for information ("PSC 2-6");
29 b. Items 3, 6, 7, 20b, 20c, 25, 35, 44g, and 60d of KIUC's second request for
30 information ("KIUC 2-3," "KIUC 2-6," "KIUC 2-7," "KIUC 2-20b," "KIUC 2-20c,"
31 "KIUC 2-25," "KIUC 2-35," "KIUC 2-44g," and "KIUC 2-60d," respectively);

1 c. Items 3c, 5, 9, and 27c.ii of Sierra Club’s second request for information (“SC 2-3c,”
2 “SC 2-5b,” “SC 2-9e,” and “SC 2-27c.ii,” respectively).

3 Certain of the attachments to Big Rivers’ responses to PSC 2-6, KIUC 2-3, KIUC 2-44g,
4 KIUC 2-60d, and SC 2-27c.ii are voluminous. If printed, the electronic attachment to Big
5 Rivers’ response to PSC 2-6 would contain over 240 pages, the electronic attachment to KIUC 2-
6 3 would contain over 190 pages, the electronic attachment to KIUC 2-44g contains
7 approximately 89 emails (many with attachments), the non-confidential electronic attachment to
8 SC 2-27c.ii would contain over 130 pages, and the confidential attachment to SC 2-27c.ii
9 contains well over 100 hundred Excel, pdf, and other files.

10 The electronic attachment to KIUC 2-6 is an Excel spreadsheet that is difficult to read if
11 printed in hardcopy. The electronic attachments to KIUC 2-7, KIUC 2-20b, KIUC 2-20c, KIUC
12 2-25, KIUC 2-35, KIUC 2-60d, SC 2-3c, SC 2-5b, and SC 2-9e are being filed electronically
13 because the question asked for an electronic spreadsheet.

14 WHEREFORE, Big Rivers respectfully requests that the Commission enter an order
15 granting a deviation to Big Rivers from the requirement to file a hardcopy original and ten paper
16 copies of the attachments to its responses to the above requests for information.

17 On this the 6th day of July, 2012.

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19 _____
20 James M. Miller
21 Tyson Kamuf
22 SULLIVAN, MOUNTJOY, STAINBACK
23 & MILLER, P.S.C.
24 100 St. Ann Street, P. O. Box 727
25 Owensboro, Kentucky 42302-0727
26 (270) 926-4000

27 Counsel for Big Rivers Electric Corporation
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