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OCT 15 2014

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

In the Matter of:

THE 2014 INTEGRATED RESOURCE PLAN OF) CASE NO. 2014-00166
BIG RIVERS ELECTRIC CORPORATION)

MOTION OF BIG RIVERS ELECTRIC COPORATION FOR DEVIATION

Pursuant to 807 KAR 5:001 Section 22, 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(1) that Big Rivers file an original and ten hardcopies of any filings with the Commission; (ii) the requirement in 807 KAR 5:001 Section 13(2)(a)(3) that Big Rivers file one highlighted hardcopy and ten redacted hardcopies of material containing confidential information submitted pursuant to a petition for confidential treatment; and (iii) the requirement in 807 KAR 5:001 Section 13(2)(b) that Big Rivers serve a redacted hardcopy of material submitted pursuant to a petition for confidential treatment on each party.

Big Rivers is filing with this motion its responses to the Supplemental Requests for Information of the Commission Staff, the Office of the Attorney General (“AG”), Kentucky Industrial Utility Customers, Inc. (“KIUC”), and Ben Taylor and Sierra Club (together, “Sierra Club”). Except as explained herein, Big Rivers is: (i) filing a hardcopy original and ten paper copies of the public version of its responses and all attachments; (ii) filing one hardcopy of the pages of any responses and attachments containing information being submitted pursuant to a petition for confidential treatment; and (iii) serving a redacted hardcopy of the pages containing confidential information on each party.

1 Certain of the attachments to Big Rivers' responses to Items 2 and 9 of the
2 Attorney General's Supplemental Requests for Information ("AG 2-2" and "AG 2-9,"
3 respectively) and Items 5, 7, and 16 of the Sierra Club's Initial Requests for Information
4 ("SC 2-5," "SC 2-7," and "SC 2-16," respectively) are provided electronically on a public
5 CD attached to the original and each copy of the responses, on a CONFIDENTIAL CD
6 filed under a petition for confidential treatment, or both.

7 The attachments for AG 2-2, AG 2-9, and SC 2-16 that are being provided
8 electronically are being provided electronically because the respective question asked that
9 the attachments be provided electronically. These files are either: (i) Excel files that are
10 designed for electronic viewing, and they do not lend themselves to printing in an
11 understandable or legible format without significant alteration; or (ii) files that were
12 previously produced electronically in Cases No. 2012-00535 and 2013-00199 and which
13 were requested again by the Attorney General. Accordingly, Big Rivers is not providing
14 a hardcopy of these attachments.

15 The attachments for SC 2-5(d) and SC 2-7 that are being provided electronically
16 are being provided electronically because they are they are Excel files that are designed
17 for electronic viewing, and they do not lend themselves to printing in an understandable
18 or legible format without significant modification of the original file(s). Accordingly,
19 Big Rivers is not providing a hardcopy of these attachments. If printed, the electronic
20 attachment for SC 2-5(d) would be more than 350 pages long and would require
21 modification in the form of reformatting for width, as well; similarly, the electronic
22 attachment for SC 2-7 would require modification in the form of reformatting for length
23 and width.

1 In addition, the electronic attachments for AG 2-2, AG 2-9, SC 2-5(d), and the
2 paper attachments for SC 2-5(c-d) are being filed under a petition for confidential
3 treatment. As noted in the petition for confidential treatment, these attachments are being
4 redacted in their entirety either because they are spreadsheets and Big Rivers cannot
5 redact the confidential material from those files without making other cells in the
6 spreadsheet unusable, or because the pervasive nature of the confidential information
7 makes the production of ten (10) redacted, public versions of these documents ineffectual
8 and unhelpful to the Commission, the parties, and the public. Big Rivers has not
9 produced a redacted, public version of these attachments that have been produced
10 pursuant to a petition for confidential treatment.

11 Finally, the paper attachments for AG 2-9 are being filed under a petition for
12 confidential treatment. As noted in the petition for confidential treatment, these
13 attachments are simply copies of Big Rivers' previous responses to certain data requests
14 in Cases No. 2012-00535 and 2013-00199. Because public versions of those attachments
15 were produced in the record of those cases, it would be overly burdensome to the record
16 in this case to reproduce those same public versions yet again. Similarly, a duplicate set
17 of public versions of these documents would be ineffectual and unhelpful to the
18 Commission, the parties, and the public. Consequently, Big Rivers has not produced
19 redacted, public versions of these attachments that have been produced pursuant to a
20 petition for confidential treatment.

21 WHEREFORE, Big Rivers respectfully requests that the Commission enter an
22 order granting Big Rivers deviation from 807 KAR 5:001 Sections 7 and 13 to: (i)

1 produce the attachments discussed above in electronic format, and (ii) omit public,
2 redacted copies of the confidential attachments.

3 On this the 14th day of October, 2014.

4 Respectfully submitted,

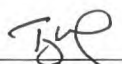
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23 **Certificate of Service**

24
25 I certify that a true and accurate copy of the foregoing was or will be served by
26 first class mail, by Federal Express, or by hand delivery upon the persons listed on the
27 accompanying service list, on or before the date the foregoing is filed with the Kentucky
28 Public Service Commission.

29
30 On this the 14th day of October, 2014,

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34 _____
35 *Counsel for Big Rivers Electric Corporation*