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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

3 In the matter of:

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

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MOTION FOR DEVIATION

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1. Big Rivers Electric Corporation (“Big Rivers”) hereby moves the Kentucky

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Public Service Commission (“Commission”) for a deviation from (i) the requirement in 807

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KAR 5:001 Section 7(1) that Big Rivers file an original and ten copies of all papers filed with the

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Commission; and (ii) the requirements in 807 KAR 5:001 Section 13(2)(a)(3) that Big Rivers file

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one paper copy of material containing confidential information submitted under a petition for

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confidential treatment and ten paper copies of that material with the confidential information

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redacted.

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2. Big Rivers is filing with this motion a hardcopy original and ten paper copies of

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(i) a Notice and Application and (ii) and petition for confidential treatment. The Notice and

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Application includes workpapers that are attached as Exhibit Berry-2 to the Direct Testimony of

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Robert W. Berry (which is Exhibit 4 to the Notice and Application), some of which are being

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submitted under the petition for confidential treatment.

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3. Except for two documents (the electronic files ‘2017-2031 PCM NewFormat

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Budget-9-18-17 Price wo C-WG MR-HMPL Exit 2019 (no links).xlsx’ and ‘Financial Forecast

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(2018-2031) 11-21-2017 HMPL Exit.xlsx’), Big Rivers is filing one unredacted paper copy of all

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pages from Exhibit Berry-2 that contain confidential information, ten paper copies of those pages

1 with the confidential information redacted, and an original and ten paper copies of all pages from
2 Exhibit Berry-2 that do not contain confidential information. Big Rivers is providing the other
3 two documents only electronically, on the confidential CD accompanying this filing, pursuant to
4 the petition for confidential treatment. These two documents are being provided electronically
5 so that the Commission will have the Excel files with formulas intact. For the convenience of
6 the Commission, Big Rivers is also providing a copy of all of the other workpapers
7 electronically, either on the same confidential CD, pursuant to the petition for confidential
8 treatment, or on a public CD.


9 4. The two documents that are being provided only electronically are voluminous. If
10 printed, these documents would exceed 500 pages and 600 pages, respectively. As such, Big
11 Rivers requests a deviation from the requirement to provide a confidential paper copy of these
12 documents. Further, since these documents are spreadsheets, Big Rivers cannot redact the
13 confidential material from those files without making other cells in the spreadsheet unusable. As
14 such, Big Rivers requests a deviation from the requirement to provide ten paper copies of these
15 documents with the confidential material redacted.

16 WHEREFORE, Big Rivers respectfully requests that the Commission enter an order
17 granting a deviation to Big Rivers from the above requirements.

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1 On this the 1st day of May, 2018.

2 Respectfully submitted,

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