

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR AN ADJUSTMENT OF ITS)	
ELECTRIC RATES)	CASE NO. 2012-00221

MOTION OF KENTUCKY UTILITIES COMPANY TO DEVIATE FROM
REQUIREMENT GOVERNING FILING OF DOCUMENTS IN PAPER OR
ELECTRONIC MEDIUMS

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 certain requirements of the Commission’s June 22, 2012 Order allowing for electronic case filing. Specifically, KU requests that it be excused from filing any documents in paper medium where the individual attachment to a data response exceeds 1,000 pages due to the fact that such attachments are unduly voluminous and difficult to reproduce within the time provided to file the data responses. The attachments which are the subject of this motion are being provided in response to the Commission’s Second Request for Information No. 45; the Attorney General’s (“AG”) Initial Request for Information Nos. 34, 121, 201, 216, and 217; the Kentucky Industrial Utilities Customers, Inc.’s (“KIUC”) Initial Request For Information No. 42(c); and the Kroger Company’s Initial Request for Information No. 1(f). In addition, KU requests that it be excused from filing in electronic medium its response to AG Request No. 34 due to its voluminous file size. Finally, certain files in the attachment to AG 1-152 are video files that cannot be uploaded to the Commission website or provided in paper form. In support of its Motion, KU states as follows:

1. On June 29, 2012, KU filed with the Commission an application proposing changes in its base rate tariffs. On July 31, 2012, the Commission issued its Second Requests for Information to KU, and the AG, KIUC, and the Kroger Company issued their Initial Requests for Information to KU.

2. Paragraph 13 of the Commission's June 22, 2012 Order requires KU to file an original and one copy of all documents in paper medium no later than two business days following electronic filing. The Commission's Order of July 31, 2012 directs KU to file an original and two copies of all documents in paper medium.

3. Paragraph 15(a) of the Commission's June 22, 2012 Order requires KU to file in paper medium a redacted version of all documents for which confidential protection is sought. Paragraph 15(b) requires KU to file in paper medium a copy of the confidential material "that identifies by underscoring, highlighting with transparent ink, or other reasonable means only those portions that would disclose confidential material unless deleted and a CD-ROM containing an electronic version of such material with highlighting."

4. In response to the Commission's Request No. 45, KU is providing documents that total 4,534 pages. In providing an original and two paper copies to the Commission, KU would have to provide a total of 13,062 pages.

5. In response to AG's Request No. 34, KU is providing a file that is over 900 megabytes in size and would amount to 2,965 printed pages. KU is requesting the Commission to excuse KU from electronically filing this response through the Commission's website because of its voluminous file size. Instead, KU will provide this file to the Commission and to the AG

on a DVD.¹ In providing an original and two paper copies to the Commission, KU would have to provide a total of 8,895 pages.

6. In response to the AG's Request No. 121, KU is providing documents that total 1,684 pages. In providing an original and two paper copies to the Commission, KU would have to provide a total of 5,052 pages.

7. In response to AG's Request No. 152, KU is providing on disc video files that cannot be uploaded to the Commission's website or placed on paper.

8. In response to the AG's Request No. 201, KU is providing both confidential and nonconfidential documents. The confidential documents will be filed in paper medium under seal attached to a petition for confidential protection. KU proposes that the nonconfidential, public documents which total 4,641 pages will be filed in electronic medium only. In providing an original and two paper copies to the Commission, KU would have to provide a total of 13,923 pages.

9. In response to the AG's Request No. 216, KU is providing documents that total 1,784 pages. In providing an original and two paper copies to the Commission, KU would have to provide a total of 5,352 pages.

10. In response to the AG's Request No. 217, KU is providing documents that total 2,388 pages. In providing an original and two paper copies to the Commission, KU would have to provide a total of 7,164 pages.

11. In response to KIUC's Request No. 42(c), KU is providing both confidential and nonconfidential documents. The public, nonconfidential documents will be filed in both electronic and paper medium. The confidential documents total well over 7,479 pages and will be filed in electronic medium only under a Petition for Confidential Protection. In providing an

¹ Upon request, KU will provide any other party with the DVD responsive to AG 1-34.

original and two copies in paper medium to the Commission, KU would have to provide approximately 22,437 pages in total.

12. In response to the Kroger Company's Request No. 1(f), KU is providing documents that total 1,055 pages. In providing an original and two paper copies to the Commission, KU would have to provide 3,165 pages in total.

13. Due to the voluminous nature of these documents, totaling over 70,000 pages with the original and two copies in paper medium, and that certain files are video files, KU requests permission pursuant to 807 KAR 5:001, Section 14 to deviate from the Commission's June 22, 2012 Order and provide all documents in electronic medium only on a DVD.

WHEREFORE, KU requests deviation from the requirement that parties provide an original and two paper copies of the data responses. KU requests that it be allowed to instead submit the attachments identified above in electronic medium only on a disc in compliance with this requirement. Additionally, KU requests deviation from the requirement that it electronically file through the Commission's website its response to AG Request No. 34. KU requests that it be allowed to instead submit this response and attachment in electronic medium only on a disc in compliance with this requirement.

Dated: August 14, 2012

Respectfully submitted,



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CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Kentucky Utilities Company's August 14, 2012 electronic filing of the Motion for Deviation is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on August 14, 2012; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and two copies in paper medium of the Petition are being hand delivered to the Commission on August 14, 2012.



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