

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC AND GAS)
RATES, A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY,)
APPROVAL OF OWNERSHIP OF GAS)
SERVICE LINES AND RISERS, AND A GAS)
LINE SURCHARGE)**

CASE NO. 2012-00222

**MOTION OF LOUISVILLE GAS AND ELECTRIC COMPANY TO DEVIATE
FROM REQUIREMENT GOVERNING FILING OF PAPER DOCUMENTS**

Louisville Gas and Electric Company (“LG&E”) by counsel, petitions the Kentucky Public Service Commission (“Commission”) to grant LG&E 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, LG&E 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. Moreover, LG&E also requests that it be excused from electronically filing any attachment that exceeds 50 MB, because of the technical difficulties associated with uploading files exceeding that size. The attachments which are the subject of this motion are being provided in response to the Attorney General’s Supplemental Requests for Information No. 31 and Kentucky Industrial Utility Customers’ (“KIUC”) Second Set of Data Requests Nos. 44(d), 80 and 83. In support of its Motion, LG&E states as follows:

1. On June 29, 2012, LG&E filed with the Commission an application proposing changes in its base rate tariffs. On August 28, 2012, the Attorney General and the KIUC issued their Supplemental Data Requests and Second Set of Data Requests to LG&E, respectively.

2. Paragraph 13 of the Commission's June 22, 2012 Order requires LG&E to file an original and one copy of all documents in paper medium no later than two business days following electronic filing. The data requests issued by the Commission require LG&E to provide an original and two paper copies of each response.

3. In response to the Attorney General's Request No. 31, LG&E is providing documents that total 3,392 pages. In providing an original and two paper copies to the Commission, LG&E would have to provide a total of 10,176 pages.

4. In response to the KIUC's Request No. 44(d), LG&E is providing documents that total 1,090 pages.¹ In providing an original and two paper copies to the Commission, LG&E would have to provide a total of 3,270 pages. When converted to an electronic file, the documents comprise 91 MB.

5. In response to the KIUC's Request No. 80, LG&E is providing documents that total less than 1,000 pages, but when converted to an electronic file, the documents comprise 205 MB.

6. In response to the KIUC's Request No. 83, LG&E is providing documents that total 3,865 pages. In providing an original and two paper copies to the Commission, LG&E would have to provide a total of 11,595 pages. When converted to an electronic file, the documents comprise 500 MB.

7. Due to the voluminous nature of the documents provided in response to Attorney General Request No. 31, LG&E requests permission pursuant to 807 KAR 5:001, Section 14 to

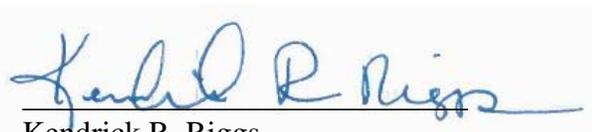
¹ LG&E is also providing Excel files in response to this request that are not the subject of this Motion.

deviate from the Commission's June 22, 2012 Order and provide the documents in electronic medium only by filing on the Commission's website. Because of the voluminous nature of the documents provided in response to KIUC Request Nos. 44 and 83², and their extremely large file size, LG&E requests permission pursuant to 807 KAR 5:001, Section 14 to only provide the responses on a DVD that will be mailed to all parties. Finally, because the response to KIUC Request No. 80 has a very large file size, LG&E requests permission pursuant to 807 KAR 5:001, Section 14 to only provide an original and two copies of the response in paper medium to the Commission and to all other parties on a DVD.

WHEREFORE, LG&E requests deviation from the requirement that parties upload its responses and provide an original and two paper copies of the data responses. LG&E requests that it be allowed to instead submit the attachments identified above in the manner herein described.

Dated: September 12, 2012

Respectfully submitted,



Kendrick R. Riggs
W. Duncan Crosby III
Barry L. Dunn
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000

² LG&E has simultaneously filed a Petition for Confidential Protection that seeks to provide a portion of the attachment to Request No. 83 confidentially under seal. LG&E will mail a DVD containing the confidential version of the response to parties that have executed a confidentiality agreement with LG&E, and will mail a DVD containing the public version of the response to parties that have not executed a confidentiality agreement.

Allyson K. Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088

Robert M. Watt III
Lindsey W. Ingram III
Monica H. Braun
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507-1801

Counsel for Louisville Gas and Electric Company

CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Louisville Gas and Electric Company's September 12, 2012 electronic filing of the Motion to Deviate 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 September 12, 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 Motion are being hand delivered to the Commission on September 12, 2012.



Counsel for Louisville Gas and Electric Company