

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

**In the Matter of:**

**APPLICATION OF LOUISVILLE GAS AND )**  
**ELECTRIC COMPANY TO MODIFY ITS )**  
**CERTIFICATE OF PUBLIC CONVENIENCE ) CASE NO. 2012-00469**  
**AND NECESSITY AS TO THE MILL CREEK )**  
**UNIT 3 FLUE-GAS DESULFURIZATION UNIT )**

**MOTION OF LOUISVILLE GAS AND ELECTRIC COMPANY**  
**FOR APPROVAL TO DEVIATE FROM**  
**REQUIREMENT GOVERNING FILING OF COPIES**

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 October 25, 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 the attachment at issues is unduly voluminous. The attachment that is the subject of this Motion is being provided in response to the Commission Staff’s First Request for Information to No. 11, and is the subject of a Petition for Confidential Protection LG&E is filing herewith.

In support of its Motion, LG&E states as follows:

1. Paragraph 15 of the Commission’s October 25, 2012 Order addresses filing confidential information. The paragraph requires LG&E to file “a paper copy of the material in question 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.”

2. The attachment that is the subject of this Motion is a collection of Strategist files being provided in response to the Commission Staff's First Request for Information to No. 11. (The Strategist files are confidential and are the subject of a petition for confidential protection being filed herewith.) The Strategist files that would consume over 40,000 pages, and would be mostly unintelligible because they are intended to be read by computers.

3. Due to the voluminous nature of the documents provided in response to Item No. 11, LG&E requests permission pursuant to 807 KAR 5:001, Section 14 to deviate from the Commission's October 25, 2012 Order and provide the information at issue, which is confidential, solely on a DVD-ROM or CD-ROM.

**WHEREFORE**, Louisville Gas and Electric Company requests a deviation from the requirement that a party file a paper copy of confidential information. LG&E requests that it be allowed to instead submit the attachment identified above in the manner herein described.

Dated: November 30, 2012

Respectfully submitted,



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*Counsel for Louisville Gas and Electric Company*

**CERTIFICATE OF COMPLIANCE**

In accordance with Ordering Paragraph No. 10 of the Commission's October 25, 2012 Order, this is to certify that Louisville Gas and Electric Company's November 30, 2012 electronic filing of the Motion for Approval to Deviate From Requirement Governing Filing of Copies 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 November 30, 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 one copy in paper medium of the Motion are being hand delivered to the Commission on November 30, 2012.

A handwritten signature in blue ink, reading "Gerald R. Riggs", is written over a horizontal line. The signature is cursive and appears to be a scan of a physical document.

*Counsel for Louisville Gas and Electric Company*