

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**JOINT APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY AND KENTUCKY)
UTILITIES COMPANY FOR A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY)
FOR THE CONSTRUCTION OF A COMBINED)
CYCLE COMBUSTION TURBINE AT THE)
GREEN RIVER GENERATING STATION AND A)
SOLAR PHOTOVOLTAIC FACILITY AT THE)
E.W. BROWN GENERATING STATION)**

CASE NO. 2014-00002

**JOINT MOTION OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY FOR DEVIATION**

Joint Applicants, Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) (collectively, the “Companies”), move the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 22, for the entry of an order granting them deviation from the provision of 807 KAR 5:001, Section 8, requiring the submission of one paper copy of certain responses to requests for information in this proceeding. In support of the foregoing motion, the Companies state as follows.

1. The Companies prepared and filed electronically responses to the requests for information propounded by the Commission Staff and the intervenors in this proceeding on March 27, 2014. Six of the responses, including the attachments thereto, are extremely voluminous.

2. The information that is responsive to Staff 1-22 consists of approximately 30,000 electronic files. In total, those files constitute approximately 400 gigabytes of information.

3. The information that is responsive to Attorney General 1-148 is one Excel file that is approximately 32 megabytes of information with numerous pivot tables and rows of data. If printed, it would be approximately 2,500 pages.

4. The information that is responsive to Attorney General 1-150 is one Excel file that is approximately 35 megabytes of information with numerous pivot tables and rows of data. If printed, it would be approximately 5,500 pages.

5. The Companies are seeking confidential protection of the responses to Staff 1-22, Attorney General 1-148 and Attorney 1-150. Therefore, the Companies placed information responsive to those requests on external hard drives and/or other electronic medium and delivered it to the Commission in that format on March 27, 2014.

6. The information that is responsive to Attorney General 1-13(c) consists of multiple files, two of which are Excel files that are approximately 85 megabytes each for a total of 170 megabytes of data.

7. The information that is responsive to Sierra Club 1-18(a) consists of multiple files, two of which are Excel files that are a combined total of approximately 150 megabytes of data.

8. The information that is responsive to Sierra Club 1-19(e) consists of 13 Excel files which total 459 megabytes of data.

9. Certain information responsive to Attorney General 1-13(c), Sierra Club 1-18(a) and Sierra Club 1-19(e) is confidential and the remainder is not confidential. The Companies have uploaded the non-confidential files responsive to those requests to the Commission, but the paper version of these files would be extremely voluminous. Therefore, the Companies propose to place such non-confidential information responsive to those requests on external hard drives and/or other electronic medium, rather than paper, and have them delivered to the Commission.

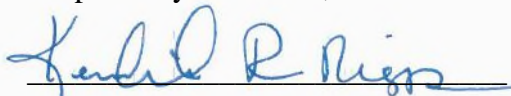
The Companies delivered the confidential portions of those responses to the Commission on electronic storage media on March 27, 2014.

10. 807 KAR 5:001, Section 22, provides that in special cases, for good cause shown, the Commission may permit deviations from its rules. Because compliance with the paper medium portion of 807 KAR 5:001, Section 8(12)(a)(2), would require the filing of tens of thousands of pages of paper, the Companies believe that good cause exists to permit them to file the responses to Staff 1-22, Attorney General 1-148, Attorney 1-150, Attorney General 1-13(c), Sierra Club 1-18(a) and Sierra Club 1-19(e) in electronic medium rather than paper medium.

WHEREFORE, the Companies respectfully request that the Commission grant deviation from the paper medium requirement of 807 KAR 5:001, Section 8(12)(a)(2) with respect to the responses to requests for information described herein.

Dated: March 28, 2014

Respectfully submitted,



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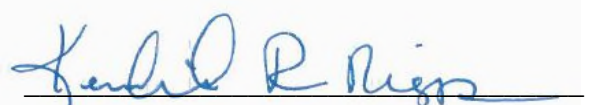
CERTIFICATE OF SERVICE

This is to certify that Louisville Gas and Electric Company and Kentucky Utilities Company's March 28, 2014 electronic copy of this Joint Motion for Deviation is a true and accurate copy of the documents being filed in paper medium, that the electronic filing was transmitted to the Commission on March 28, 2014; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; that a copy of the filing in paper medium is being hand-delivered to the Commission within two business days of this filing; and that on March 28, 2014, electronic mail notification of the electronic filing will be provided to the following:

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