### 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	)	CASE NO. 2014-00002
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	)	

# 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 13(2)(a)(3), requiring the submission of one sealed 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 April 24, 2014. One of the responses, including the attachments thereto, is extremely voluminous.
- 2. The information that is responsive to Item No. 19 Kentucky Industrial Utility Customers, Inc.'s Second Set of Data Requests consists of approximately 171 electronic files constituting approximately 3.4 gigabytes of information.
- 3. The Companies are seeking confidential protection of the attachments to the response to KIUC 2-19 for the reasons set forth in their April 24, 2014 Petition for Confidential

Protection. The Commission's confidentiality regulation, 807 KAR 5:001, Section 13(2)(a)(3) requires the filing of one sealed paper copy of the response to KIUC 2-19. However, given the voluminous size of that response, the Companies propose to place the confidential response to KIUC 2-19 on electronic storage medium and submit it to the Commission in that format rather than in paper format.

4. 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 13(2)(a)(3) would require the filing of a voluminous amount of paper, the Companies believe that good cause exists to permit them to file the confidential response to KIUC on 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 13(2)(a)(3).

Dated: April 24, 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 April 24, 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 April 24, 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 April 24, 2014, electronic mail notification of the electronic filing will be provided to the following:

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