COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
THE APPLICATION OF KENTUCKY-AMERICAN WATER COMPANY FOR AN ADJUSTMENT IN)	CASE NO. 2015-00418
WATER RATES)	

THE ATTORNEY GENERAL AND LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S MOTION FOR DEVIATION

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and Lexington-Fayette Urban County Government ("LFUCG") and respectfully requests a deviation from 807 KAR 5:001 Sections 8(3) and 12(a), which requires a paper copy of electronically filed documents to be filed with the Commission, and from the Commission's Procedural Order dated February 22, 2016, numerical paragraph 3(a) requiring an original in paper medium of Responses to Requests for Information to be filed with the Commission.

The Attorney General and LFUCG electronically filed the Responses to the Commission and Kentucky-American Water's Request for Information on June 6, 2016, and intends to file the Responses in paper medium on June 8, 2016, with the exception of the Woolridge Articles Volumes 1-7 ("Articles"). The Attorney General and LFUCG are requesting deviation from filing the Articles in paper medium since it contains over 5,000 pages that would require excessive time, money, and paper to print, tab, and compile this portion of the filing. The remainder of the Attorney General and LFUCG's Responses to Requests for Information shall be filed in accordance with the rules and in conformity with the Commission's Procedural Order.

WHEREFORE, the Attorney General and LFUCG respectfully request that the Commission grant the motion for deviation as to the Woolridge Articles Volumes 1-7.

Respectfully submitted,

ANDY BESHEAR

ATTORNEY GENERAL

ANGÉLA M. GOAD

KENT CHANDLER

REBECCA W. GOODMAN

ASSISTANT ATTORNEYS GENERAL

1024 CAPITAL CENTER DRIVE, SUITE 200

FRANKFORT KY 40601-8204

PHONE: (502) 696-5453

FAX: (502) 573-1005

Angela.Goad@ky.gov

Kent.Chandler@ky.gov

Rebecca.Goodman@ky.gov

By:

David J. Barberie

dbarberi@lexingtonky.gov

Managing Attorney

Andrea C. Brown

abrown2@lexingtonky.gov

Janet M. Graham

jgraham@lexingtonky.gov

Department of Law

200 East Main Street

Lexington, Kentucky 40507

(859) 258-3500

Attorneys for Lexington-Fayette Urban

County Government

Certificate of Service and Filing

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on June 8, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

this 8th day of June, 2016.

Assistant Attorney General