

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN ADJUSTMENT)	
OF ITS ELECTRIC RATES AND FOR CERTIFICATES)	CASE NO. 2016-00370
OF PUBLIC CONVENIENCE AND NECESSITY)	

-and-

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR AN ADJUSTMENT)	
OF ITS ELECTRIC AND GAS RATES AND FOR)	CASE NO. 2016-00371
CERTIFICATES OF PUBLIC CONVENIENCE AND)	
NECESSITY)	

THE ATTORNEY GENERAL'S MOTION FOR DEVIATION

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, 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 Orders dated December 13, 2016, numerical paragraphs 4, as issued in both cases, requiring an original and six copies in paper medium of any paper filed by a party with the Commission.

In both of the above-styled matters the Attorney General electronically filed his testimony and corresponding exhibits and schedules on March 3, 2017, and intends to file the original and six copies of those documents on March 7, 2017, with the exception of certain excel spreadsheets. The Attorney General is requesting deviation from filing several

excel spreadsheets that when printed contain about 150,000 pages per volume. Considering the Commissions' Orders dated December 13, 2016, between the original and six copies for each case, when both matters are taken into account the total number of pages filed with the Commission would likely be in excess of 2 million. All of the documents for which the Attorney General requests such deviation are currently uploaded and accessible on the Commission's website, and none of them are formatted for printing. In fact, when viewed as they would be as printed, the spreadsheets are nearly unidentifiable and not readily usable. Further, it would require excessive time, money, and paper to print, tab, and compile this portion of the filing, especially considering that the outcome will be unusable for the recipient. The titles of the specific Excel documents for which the Attorney General seeks such deviation are listed in case-specific headings in the attached "APPENDIX A" to this filing. The remainder of the Attorney General's electronically filed documents in this matter shall be filed in accordance with the rules and in conformity with the Commission's Procedural Order.

WHEREFORE, the Attorney General respectfully request that the Commission grant the motion for deviation as to the specified excel spreadsheets.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



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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 March 6, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 6th day of March, 2017.



Assistant Attorney General

APPENDIX A

Case No. 2016-00371:

1. "Seeyle Modified BIP as corrected 100 percent demand"
2. "Seeyle Modified BIP as corrected"
3. "TAI BIP Primary 100 percent Demand"
4. "TAI BIP with Customer-Demand Split"
5. "TAI Prob Dispatch with 100 percent demand"
6. "TAI Prob Dispatch with Time Fuel and Customer Demand Split"
7. "TAI Correction GAS CCOSS- Att_LGE_PSC_1-53_LGEGasCoss"
8. TAI PandA 100 percent Demand"
9. "Completed 1 Probability of Dispatch LGE – Using Depreciated Reserve"
10. "Completed 3 Probability of Dispatch LGE – Using Gross PLT"
11. "Hourly Fuel Costs KU and LGE – With Source and Meter – adjusted"

Case No. 2016-00370

1. "KU Seeyle BIP Corrected for Errors with 100 percent Demand"
2. "KU Seeyle BIP Corrected for Errors"
3. "TAI BIP Primary 100 percent Demand"
4. "TAI BIP with Customer-Demand Split"
5. "TAI Prob Dispatch with Time Fuel & Customer-Demand Split"
6. "Completed 2 Probability of Dispatch KU – Using Depreciated Reserve"
7. "Completed 4 Probability of Dispatch KU- Using Gross Plt"
8. "Hourly Fuel Costs KU and LGE – With Source and Meter – adjusted"
9. "KU Zip Code Analysis"