

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

-and-

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

**ATTORNEY GENERAL'S MOTION FOR PARTIAL DEVIATION**

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and respectfully requests a partial deviation from the filing requirements of 807 KAR 5:001 §§ 8(3) and (12)(a), which require 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.

On March 31, 2017, the Attorney General electronically filed his responses to data requests of the Commission Staff, LG&E, KU, Louisville Metro Government, and Kentucky League of Cities, together with corresponding exhibits, schedules, and workpapers, many of which are in Excel spreadsheet format. The Attorney General intends to file the original and six copies of the actual responses, with the exception of the

corresponding exhibits and schedules. Producing the seven (7) hard copies of these documents would require at least 85,000 pages and over 300 binders, which would have to be transported in approximately 43 banker-sized boxes. The Attorney General does not have the resources necessary to accomplish such an undertaking given the short period of time remaining under the current procedural schedule in these cases.

Moreover, many of the documents for which the Attorney General seeks this partial deviation are in their native Excel spreadsheet format. As such, if they were to be printed, the spreadsheets would be rendered nearly unidentifiable and not readily usable.

All of the documents for which the Attorney General requests such deviation are currently uploaded and fully accessible on the Commission's website for the Commission and the parties to review, and as such form a part of the official record in this case. The titles of the specific documents for which the Attorney General seeks such deviation are listed in case-specific headings in the attached "APPENDIX A" to this filing.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion for partial deviation.

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 31, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 31<sup>st</sup> day of March, 2017.



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Assistant Attorney General

## APPENDIX A

Case No. 2016-00371:

1. "Ameren Illinois Benefit-Cost Analysis"
2. "ConEd AMI Plan"
3. "National Grid Intro-Overview"
4. "Holloway ld2"
5. "Holloway LD1"
6. "Holloway lwh"
7. "Holloway DA"
8. "Holloway Transmission"
9. "Smith LGE-AG Q6 Attachment 1"
10. "Smith LGE-AG Q6 Attachment 2"
11. "CCOSS Summary-LGE Electric"
12. "Schedule GAW-2"
13. "TAI BIP LG&E Classification"
14. "Woolridge 2015-2016"
15. "Woolridge A-B"
16. "Woolridge C-E"
17. "Woolridge F-G"
18. "Woolridge H-L"
19. "Woolridge M-P"
20. "Woolridge R-S"
21. "Woolridge T-V"
22. "Woolridge W-Z"
23. "Dechow et al, The Relation between Analysts Forecasts and Equity Offerings – CAR – 2000.PDF"
24. "Dimson et al – Credit Suisse – 2015 Investment Returns Yearbook"
25. "Level and Persistence of Growth"
26. "Mercer – a review of equity risk premium – Mercer – October 2013"
27. "Richardson et al – The Walkdown to Beatable – 2001"
28. "Woolridge Electric V Lines Jan 28, 2017"
29. "Woolridge Gas V Lines Dec 2, 2016"
30. "Authorized ROEs and Ten-Year Treasury Yields since 2000 – Updated"
31. "Beta Study – 2-17"
32. "Betas 2-17"
33. "Damodaran Data – 2017"
34. "Electric Proxy Group – Dividend Yields – 1-27-17"
35. "Electric Proxy Group – February 2017 Financial Data"
36. "Gas Company COC Data – 2017"

37. "GDC Financial Data – February 2017"
38. "GDP Annual Data – GDPA – Fred 1960-2016"
39. "GDP Growth – Nominal, Real and Inflation – Annual Rates"
40. "GDP Growth – Nominal, Real and Inflation"
41. "GDP Growth Measures – EIA, GI,SSA – Feb 2017"
42. "Kentucky Utilities – KY – 2017 ROR Exhibits Final – 3-4-17 JRWoolridge"
43. "LGE – KY – 2017 ROR Exhibits Final 3-14-17 – JRWoolridge"
44. "Mergent Bond Yields – 2000-present"
45. "ROE – MTB Study – 5-20-16"
46. "Ten-Year Treasury, Aaa, and Baa Interest Rates – Updated"

Case No. 2016-00370

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37. "Mergent Bond Yields – 2000-present"
38. "ROE – MTB Study – 5-20-16"
39. "Ten-Year Treasury, Aaa, and Baa Interest Rates – Updated"
40. "CCOSS Summary GAW 13"
41. "Customer Cost Analysis GAW 14"
42. "Schedule GAW-2"
43. "TAI BIP KU Classification"