

**Commonwealth of Kentucky
Before the Public Service Commission**

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC AND GAS)
RATES AND FOR CERTIFICATES OF PUBLIC)
CONVENIENCE AND NECESSITY)

Case No.
2016-00371

Motion to Deviate from Requirement for Printed Copies

Pursuant to 807 KAR 5:001, Section 22, Louisville/Jefferson County Metro Government ("Louisville Metro") moves the Kentucky Public Service Commission ("the Commission") to grant limited approval to deviate from the requirement to submit paper copies of electronically filed documents. In support of this motion, Louisville Metro states:

1. On October 24, 2016, the Commission established this proceeding and ordered that "[a]ll documents submitted in this proceeding shall comply with the Commission's rules of procedure as set forth in 807 KAR 5:001 and any deviation from these rules shall be submitted in writing to the Commission for consideration."¹
2. Additionally, "[a]ny party filing a paper shall upload an electronic version using the Commission's E-Filing System and shall file an original and six copies in paper medium, except that only two copies in paper medium shall be filed of maps, plans, specifications, and drawings pursuant to 807 KAR 5:001, Section 15(2)(d)."²
3. This requirement was reasserted in the Commission's December 13, 2016, Order, which states "[a]ny party filing a paper with the Commission shall file an electronic copy in

¹ Order dated October 24, 2016, Paragraph 2.

² Id. at Paragraph 3.

accordance with the electronic filing procedures set forth in 807 KAR 5:0001, Section 8, and shall also file an original and six copies in paper medium.”³

4. Louisville Metro filed on March 30, 2017, its responses to the Commission's Requests for Information. Those responses included an excel spreadsheet created by Louisville Metro witness Dr. Woolridge. The file name is Electric_Proxy_Group_-_Dividend_Yields_-_1-27-17.
5. In the process of preparing paper copies of the Louisville Metro Responses, Counsel for Louisville Metro discovered that if this excel file were printed on paper it would consist of 774 pages per copy. Six (6) printed copies plus an “original” of the excel document would total 5,418 printed pages.
6. In comparison, the entire rest of the response filed by Louisville Metro is 19 pages total including affidavits, responses, and an additional attachment.
7. The excel workbook in native format consists of 50+ sheets of information, with nearly all of the sheets containing hundreds of lines of data. Due to the significant quantity of data contained in the workbook, when printed on paper, the information is distorted to an extent that renders it virtually incomprehensible.

WHEREFORE, due to the cost affiliated with printing and shipping the referenced information, and the high likelihood that the printed version would be of no value to the Commission, Louisville Metro now seeks deviation from the requirement to provide an original plus six copies of the file named Electric_Proxy_Group_-_Dividend_Yields_-_1-27-17.

³ Paragraph 4.

Respectfully submitted,

Gregory T. Dutton

Gregory T. Dutton
Goldberg Simpson, LLC
9301 Dayflower Street
Prospect, Kentucky 40059
Telephone: 502-589-4440
gutton@goldbergsimpson.com