

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 April 27, 2017, the Attorney General electronically filed his responses to a data request from Louisville Gas & Electric Co. in Case No. 2016-00371, and an identical one from Kentucky Utilities in Case No. 2016-00370. Both of these data requests asked Attorney General witness Glenn Watkins to provide copies of "notes, data, and workpapers . . . [and] any Excel spreadsheets or other computer generated documents

were prepared by or on behalf of Mr. Watkins” with regard to his Supplemental Testimony filed on April 14, 2017.

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.

The Attorney General intends to file the original and six copies of his actual response to this data request in the docket for each case, with the exception of the corresponding exhibits and schedules. Producing the seven (7) hard copies of these documents would require at least 1.2 million pages and an untold number of binders and bankers boxes within which to transport them. The Attorney General simply does not have the resources necessary to accomplish such an undertaking.

Approximately half 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. Multiple excel documents were not uploaded and are not accessible on the Commission’s website as they contain information that is subject to a pending motion for confidentiality by the Companies. As such, the documents with confidential information are being provided to the Commission and the Companies in accordance with Commission regulations. The names of the documents are noted on the actual response to the data request and the letter accompanying the file. 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 April 27, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 27<sup>th</sup> day of April, 2017.



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Assistant Attorney General

## APPENDIX A

### Case No. 2016-00371:

1. "LGE TAI BIP Primary 100% Demand-historic"
2. "LGE TAI BIP Primary 100% Demand-updated forecast"
3. "LGE TAI BIP with Customer-Demand Split-Historic"
4. "LGE TAI BIP with Customer-Demand Split-updated forecast"
5. "LGE TAI Prob Dispatch with 100% Demand-historic"
6. "LGE TAI Prob Dispatch with 100% Demand-updated forecast"
7. "LGE TAI Prob Dispatch with Time Fuel & Customer-Demand Split-historic"
8. "LGE TAI Prob Dispatch with Time Fuel & Customer-Demand Split-updated forecast"

### Case No. 2016-00370:

1. "KU TAI BIP Primary 100% Demand-updated forecast"
2. "KU TAI BIP Primary 100% Demand-with historical data"
3. "KU TAI BIP with Customer-Demand Split-updated forecast"
4. "KU TAI BIP with Customer-Demand Split-with historical data"
5. "KU TAI Prob Dispatch with 100% Demand-Updated Forecast"
6. "KU TAI Prob Dispatch with 100% Demand-with historic data"
7. "KU TAI Prob Dispatch with Time Fuel & Customer-Demand Split-Updated Forecast"
8. "KU TAI Prob Dispatch with Time Fuel & Customer-Demand Split-with historical data"