

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application of Kentucky Power)	
Company For (1) A General Adjustment of Its)	
Rates for Electric Service; (2) An Order)	
Approving Its 2017 Environmental Compliance)	CASE No.
Plan; (3) An Order Approving Its Tariffs and)	2017-00179
Riders; (4) An Order Approving Accounting)	
Practices to Establish a Regulatory Asset or)	
Liability Related to the Big Sandy 1 Operation)	
Rider; and (5) An Order Granting All Other)	
Required Approvals and Relief)	

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 Order dated July 17, 2017, numerical paragraph 3(a), requiring an original and six (6) copies in paper medium of any paper filed by a party with the Commission. In support of this Motion, the Attorney General states as follows.

On October 27, 2017, the Attorney General electronically filed his responses to data requests from Commission Staff and from Kentucky Power Company, both of which required the uploading of numerous lengthy documents. The Attorney General calculates that printing six (6) hard copies of all the documents that were so uploaded would require 24,875 pages. In addition to the printing costs associated with producing so many documents, the Attorney General would also incur additional costs for binders, boxes, and

labor. The Attorney General simply does not have the resources necessary to accomplish such an undertaking.

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.

The Attorney General proposes to file the original and six copies of his actual responses to these data requests, with the exception of the attachments. 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 Motion.

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 October 30, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 30th day of October, 2017.

A handwritten signature in blue ink, appearing to be the initials 'MI', is written on a light blue rectangular background.

Assistant Attorney General

APPENDIX A

Dechow_et_al,_The_Relation_between_Analysts_Forecasts_and_equity_offerings_-_CAR_-_2000.pdf	Woolridge Articles 5
Level_and_Persistence_of_Growth.pdf	Woolridge Articles 4
Woolridge_Binder1_2017_-_C.pdf	Woolridge Articles 1
Woolridge_Binder2_D_-_H.pdf	Woolridge Articles 2
Woolridge_Binder3_I_-_W.pdf	Woolridge Articles 3
Binder1_V-Lines.pdf	Woolridge Value Lines
30-Year_US_Treasury_Bond_Data.xls	Woolridge Workpapers
Authorized_ROEs_and_Ten-Year_Treasury_Yields,_Quarterly_since_2000_-_Updated.xls	Woolridge Workpapers
Betas_-_2-17.xlsx	Woolridge Workpapers
Damodaran_Data_-_2017.xlsx	Woolridge Workpapers
EEI_-_2016_Q4_Credit_Ratings.xlsx	Woolridge Workpapers
Electric_Utilities_-_Regulated_Revenue_-_2016_10-k.xlsx	Woolridge Workpapers
Electric_Utility_10-K_Financial_Data_-_2016.xlsx	Woolridge Workpapers
Electric_Utility_Dividend_Yields_-_KPC_-_9-5-17.xlsx	Woolridge Workpapers
Electric_Utility_Earnings_Estimates_-_KPC_-_9-1-17.xlsx	Woolridge Workpapers
Electric_Utility_Group_COC_Data_-_2017.xlsx	Woolridge Workpapers
GDP_Annual_data_-_GDPA_-_Fred_Data_1960-2016.xlsx.xls	Woolridge Workpapers
GDP_Growth_-_Nominal,_Real,_and_Inflation_-_Annual_Rates.xls	Woolridge Workpapers
GDP_Growth_-_Nominal,_Real,_and_Inflation.xls	Woolridge Workpapers
GDP_Growth_Measures_-_EIA,GI,SSA_-_Feb_2017.xlsx	Woolridge Workpapers

KPC_-_KY_-_2017_ROR_Exhibits_6.0_-10-3-17_-_JRWoolridge.xlsx	Woolridge Workpapers
Mergent_Bond_Yields_--_2000-present.xlsx	Woolridge Workpapers
ROE_-_MTB_Study_-_5-20-16.xlsx	Woolridge Workpapers
Ten-Year_Treasury,_Aaa,_and_Baa_Interest_Rates_--_Updated.xls	Woolridge Workpapers
CAK_Attachment_2014AmericanCommunity.xls	McCann Attachment
CAK_Attachment_AEPLIHEAP.xlsx	McCann Attachment
CAK_Attachment_AEPProgram1617.xlsx	McCann Attachment
CAK_Attachment_AEPTariff.pdf	McCann Attachment
CAK_Attachment_CAACountyList.xlsx	McCann Attachment
CAK_Attachment_CountyLIHEAP.xlsx	McCann Attachment
CAK_Attachment_FoodSecurity.xlsx	McCann Attachment
CAK_Attachment_HousingData.xls	McCann Attachment
CAK_Attachment_KCEWS.pdf	McCann Attachment
CAK_Attachment_KPC_KACA_Agreement.pdf	McCann Attachment
CAK_Attachment_KPCoCustomersinPoverty.xls	McCann Attachment
CAK_Attachment_KYRateComparison.pdf	McCann Attachment
CAK_Attachment_LIHEAP_Funding.xlsx	McCann Attachment
CAK_Attachment_LIHEAPdataStatewide.xlsx	McCann Attachment
CAK_Attachment_PSC_Case_No._2005-00341_Settlement.pdf	McCann Attachment
CAK_Attachment_SAIPEKYCounties.xlsx	McCann Attachment
CAK_Attachment_SAIPENation.xlsx	McCann Attachment

CAK_Attachment_ServiceChargeStudy.pdf	McCann Attachment
DED-1__DED-2_KY_Labor_Market_Data_FINAL.xlsx	Dismuke Workpapers
DED-3_Historic_Residential_Rates_FINAL.xlsx	Dismuke Workpapers
DED-4_Rate_per_MWh_Analysis_FINAL.xlsx	Dismuke Workpapers
DED-5_Analysis_of_Companys_Customer_Costs_FINAL.xlsx	Dismuke Workpapers
DED-6_Survey_of_Regional_Customer_Charges_FINAL.xlsx	Dismuke Workpapers
DED-7_and_DED-8_Workpapers_FINAL.xls	Dismuke Workpapers
DED- 9_Analysis_of_Companys_Customer_Counts,_Sales,_and_Revenues_(2006- 2016)_FINAL.xlsx	Dismuke Workpapers
2017-10-17_KPCo_Exhibit_RCS-1.xlsm	Workpaper
Attachment_A_-_AG_Response_to_KPC_DR_No._13_- _Authorized_ROEs_for_Electric_Proxy_Group.pdf	Attachment A Staff DR 1-13
Attachment_B_-_AG_Response_to_KPC_DR_No._13_- _Authorized_ROEs_for_McKenzie_Proxy_Group.pdf	Attachment B Staff DR 1-13
Attachment_PSC_1-16a.pdf	Att. PSC 1-16a
Attachment_PSC_1-16b.pdf	Att. PSC 1-16b
Attachment_PSC_18(b).pdf	Att. PSC 1-18b