

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR: 1) AN ADJUSTMENT)	
OF THE ELECTRIC RATES; 2) APPROVAL OF)	
AN ENVIRONMENTAL COMPLIANCE PLAN)	
AND SURCHARGE MECHANISM; 3) APPROVAL)	CASE NO.
OF NEW TARIFFS; 4) APPROVAL OF ACCOUNTING)	2017-00321
PRACTICES TO ESTABLISH REGULATORY ASSETS)	
AND LIABILITIES; AND 5) ALL OTHER REQUIRED)	
APPROVALS AND RELIEF)	

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 moves the Kentucky Public Service Commission (“Commission”) to grant a partial deviation from the filing requirements of 807 KAR 5:001 Section 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 Order dated August 2, 2017, numerical paragraph 3, requiring an original and six copies in paper medium of any paper filed by a party with the Commission. In support of his Motion, the Attorney General states as follows:

On January 31, 2017, the Attorney General filed with the Commission his responses to Data Requests from both Commission Staff and from Duke Energy Kentucky (“DEK”). In response to Commission Staff Data Request No. 7,¹ Attorney General witness Mr. Glenn

¹ The Commission’s Data Requests to the Attorney General were mistakenly mis-numbered, having included two (2) questions numbered as question no. 5. As such, although the response the AG provided was to Commission Staff No. 7, it was propounded by the Commission Staff as No. 6.

A. Watkins provided Excel files of his Class Cost of Service Studies, “CCOSS-BIP” and “CCOSS-P&A” respectfully. These documents are in their native Excel Spreadsheet form, and as such, would be rendered nearly useless when printed. Furthermore, each document is 140 pages long when printed. In response to DEK Request No. 8, Attorney General witness Mr. Rick Baudino provided Excel attachments, as well as PDF attachments following the response. The PDF attachments following the response, cumulatively, number over 870 pages. All three of these documents are readily accessible on the Commission’s website. Printing these documents would, combined, come out to over 1100 pages, and with 6 copies and an original, would result in roughly 8000 pages of paper — an unnecessary expense.

WHEREFORE, the Attorney General respectfully requests the Commission grant his motion for a deviation from the requirements of providing paper copies or the paper original of the three (3) aforementioned documents.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



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