

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS)
ENERGY CORPORATION FOR AN ADJUSTMENT) CASE No.
OF RATES AND TARIFF MODIFICATIONS) 2017-00349

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 October 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 January 17, 2018, the Attorney General electronically filed his pre-filed direct testimony, which required the uploading of numerous lengthy documents. The Attorney General proposes to submit the original and six (6) hard copies of his testimony and exhibits attached thereto, with the exception of six (6) Excel spreadsheets which if printed would require at least 2,688 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, since the documents for which the Attorney General seeks this partial deviation are in their native Excel spreadsheet format, if printed, many of the individual

sheets included in the Excel documents 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 Motion. The Attorney General is including with the filing of this motion one CD containing the above-cited six Excel spreadsheets.

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

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



LAWRENCE W. COOK
KENT A. CHANDLER
JUSTIN M. McNEIL
REBECCA W. GOODMAN
ASSISTANT ATTORNEYS GENERAL
700 CAPITOL AVE., SUITE 20
FRANKFORT KY 40601
(502) 696-5453
FAX: (502) 573-8315
Rebecca.Goodman@ky.gov
Larry.Cook@ky.gov
Kent.Chandler@ky.gov
Justin.McNeil@ky.gov

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 January 17, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 17th day of January, 2018.



Assistant Attorney General

APPENDIX A

AG Modified Allocation Factors – Staff 2-37_Att1_-2017_KY_Rev_Req_Model
AG 1-18_Att3_-_Total_Operating_Expenses – Summed
Atmos Rev Req – AG Recommendation
KY_Plant_Data-2017_case-Adj 1 Remove 12 percent Escalation for Non PRP Adds
KY_Plant_Data-2017_case-Adj 2 Restate Net Salvage Percent
KY_Plant_Data-2017_Case-As Filed