

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|---|---|----------------------------|
| ELECTRONIC APPLICATION OF |) | |
| LOUISVILLE GAS AND ELECTRIC |) | CASE NO. 2018-00295 |
| COMPANY FOR AN ADJUSTMENT OF ITS |) | |
| ELECTRIC AND GAS RATES |) | |

MOTION FOR APPROVAL TO DEVIATE FROM RULE

Pursuant to 807 KAR 5:001, Section 22, Louisville Gas and Electric Company (“LG&E”) moves the Kentucky Public Service Commission (“Commission”) to grant LG&E approval to deviate from the requirement that parties upload an electronic version of all papers filed in this case to the Commission’s website using the Commission’s E-Filing System. In support of this motion, LG&E states:

1. On August 27, 2018, LG&E filed its Notice of Intent to file a rate application for a general adjustment in its electric and gas rates, including changes to its electric and gas tariffs. LG&E subsequently filed its application on September 28, 2018.

2. On August 27, 2018, the Commission established this proceeding and ordered that “All documents submitted to the Commission in this proceeding must comply with the rules of procedure adopted by the Commission found in 807 KAR 5:001. Any deviation from these rules must be submitted in writing to the Commission for consideration.”¹

3. 807 KAR 5:001, Section 8(3) provides: “All papers shall be filed with the commission by uploading an electronic version using the commission’s E-Filing System at <http://psc.ky.gov>.”

¹ *In the Matter of: Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates*, Case No. 2018-00295, Order (Ky. PSC Aug. 27, 2018).

4. Pursuant to the Commission's Rules of Procedure, LG&E must electronically upload to the Commission's E-Filing System all filings made in this case. The Commission's Rules of Procedure require that all uploaded non-audio or video files must be in either portable document format ("PDF") or Excel format.²

5. In response to Items 1, 2, and 16 of the Kentucky School Boards Association's ("KSBA") First Request for Information, LG&E is providing thousands of CSV files, which are the native export format of the system containing the data requested.³ The CSV files are in a format that cannot be uploaded to the Commission's website or conveniently converted to either PDF or Excel format due to the volume of files provided.

6. In Item 10 of its First Set of Data Requests, Kentucky Industrial Utility Customers, Inc. ("KIUC") has requested: "Please provide a complete explanation of the methodology that is used to develop weather normalized sales, by rate class. For the 12 months ending July 2018, provide the analysis, including excel spreadsheets with formulas intact, that was used to weather normalize actual sales by rate class for each Company." LG&E used R language software to assist in the preparation of the weather normalized sales data. The R language files are in a format that is usable by that software, but that cannot be converted intelligibly to either PDF or Excel format.

7. In Item 141 of its Initial Data Requests, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, ("AG") has

² 807 KAR 5:001, Section 8(4)(b), (c).

³ KSBA 1-1 requests, "Please provide monthly LG&E system, combined system and class peak day 24- hour load profiles in Excel format for all K – 12 school accounts recorded in the last five years by rate schedule for each account." KSBA 1-2 requests, "Please provide monthly LG&E system, combined system and class peak day 24 – hour load profiles in Excel format for rate schedules GS, AES (KU), PS-sec and TODS recorded in the last five years by rate schedule for each account." KSBA 1-16 requests, "Please provide hourly load data for each participating SPS and STOD accounts recorded from July 1, 2017 to date."

requested: “With regard to Mr. Seelye’s LOLP study, provide all analyses, workpapers, spreadsheets, etc. showing the following: (a) hourly system Loss of Load Probability; (b) hourly system load (MW); (c) hourly forced outage MW (by unit as available); (d) hourly planned outage MW (by unit as available); (e) available generation production from KU/LG&E-owned facilities; (f) wholesale sales (if applicable or utilized in determining hourly LOLP); (g) wholesale purchased power (if applicable or utilized in determining hourly LOLP); (h) required reserve margin (percent or MW as applicable); (i) curtailable load available (MW); and (j) curtailable load actually curtailed (MW). In this response, provide all data and formulae necessary to replicate each hourly system Loss of Load Probability. Provide all data in executable electronic format, preferably in native Excel format, with all formulas intact and cells unprotected and with all columns and rows accessible. If data is not available in Excel format, contact counsel for the Attorney General to provide the data in ASCII common-delimited format with all fields defined.” LG&E used PROSYM software to assist in the preparation of the LOLP calculations. The PROSYM files are in a format that is usable by that software, but that cannot be converted intelligibly to either PDF or Excel format.

8. LG&E requests permission to deviate from 807 KAR 5:001, Section 8(3) by not uploading the requested file to the Commission’s E-Filing System for the reasons stated above. Rather, LG&E is requesting permission to file a copy of the various files with the Commission on a portable electronic storage medium and to serve a true and accurate copy of the medium on the AG, the requesting party, and any other party who requests a copy.

9. LG&E is making its above request to deviate pursuant to 807 KAR 5:001, Section 22.

WHEREFORE, LG&E requests a deviation from the 807 KAR 5:001, Section 8(3) requirement that parties upload an electronic version of all papers filed in this case to the Commission's website using the Commission's E-Filing System and permission to submit its response to Items 1, 2, and 16 of the KSBA's First Request for Information; Item 10 of KIUC's First Set of Data Requests; and Item 141 of the AG's Initial Data Requests instead on a portable electronic storage medium and to serve a true and accurate copy of that medium on the AG, the requesting party, and any other party who requests a copy.

Dated: November 29, 2018

Respectfully submitted,



Kendrick R. Riggs
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
Fax: (502) 627-8722
kendrick.riggs@skofirm.com

Allyson K. Sturgeon
Managing Senior Counsel
Regulatory and Transactions
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
allyson.sturgeon@lge-ku.com

Counsel for Louisville Gas and Electric Company

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Louisville Gas and Electric Company's November 29, 2018 electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing has been transmitted to the Commission on November 29, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original of the filing will be delivered to the Commission within two business days from the date of the electronic filing.



Counsel for Louisville Gas and Electric Company