

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)
KENTUCKY, INC. TO AMEND ITS DEMAND SIDE) Case No.
MANAGEMENT PROGRAMS) 2019-00277

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 September 9, 2019, requiring the filing of a hard copy of all documents filed electronically. In support of this Motion, the Attorney General states as follows.

On this date, January 10, 2020 the Attorney General electronically filed his responses to data requests of the Commission Staff and Duke Energy Kentucky, Inc., which required the uploading of numerous lengthy documents. The Attorney General proposes to submit one hard copy of his responses, with the exception of the attachments thereto which if printed would require at least 980 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 many of the documents for which the Attorney General seeks this partial deviation are in their native Excel spreadsheet format, many of the individual sheets

included in the Excel documents, if printed, 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 attachments.

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

Respectfully submitted,

DANIEL CAMERON
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 January 10, 2020; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.









This 10th day of January, 2020.

A small rectangular area containing a handwritten signature in blue ink, likely representing the Assistant Attorney General.

Assistant Attorney General

APPENDIX A

-  PSC 1 (1) Faruqui Research Review SSRN-id2020587
-  PSC 1 (2) CA Statewide_Opt-in_TOU_Evaluation-Final_Report

-  DEK 9 (1) - SGCC_Technical_and_Economic_Concepts_10_6
-  DEK 9 (2) - 01012012_MaximizingCustomerBenefits
-  DEK 9 (3) - National Conf of Regulatory Attorneys Smart Grid
-  DEK 11 (2) - BG&E Comm's Plan
-  DEK 14 (1) - Order_1404C on TVR
-  DEK 14 (2) - CPUC TVR Order in R.12-06-013
-  DEK 14 (3) - COPUC AMI Settlement Agreement 16A-0588E
-  DEK 45 - Survey of TOU experiments Faruqui