

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) APPROVAL OF TARIFFS AND)	
RIDERS; (3) APPROVAL OF ACCOUNTING)	CASE NO.
PRACTICES TO ESTABLISH REGULATORY)	2020-00174
ASSETS AND LIABILITIES; (4) APPROVAL OF)	
A CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY; AND (5) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
MOTION TO DEVIATE**

Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and moves the Commission for an Order permitting KYSEIA to deviate, in part, from the filing requirements of 807 KAR 5:001, Section 8. KYSEIA states the following.

On November 2, 2020, KYSEIA electronically filed its response to the data requests of Kentucky Power Company. The response includes, among other things, 16 Excel files provided as attachments to the response. The spreadsheets in the Excel files, in total, contain well in excess of 90,000 lines containing information. Printing out the information in the files would require the production of a significant volume of pages. Additionally, the majority of the information in the spreadsheets while readily navigable and viewable as part of an electronic spreadsheet, does not readily permit presentation and review of the information through printing out the information in paper form. The printing out of the information in the Excel files is not reasonably practicable.

The files are listed below:

2020.11.02_kpc_1_attachment_Barnes_Cogen_WP.xlsm
2020.11.02_kpc_1_attachment_Barnes_Workpaper_Savings_Impact_WP.xlsm
2020.11.02_kpc_1_attachment_Barnes_WP_Customer_Charge.xlsx
2020.11.02_kpc_1_attachment_Barnes_WP_Disconnect_Stats.xlsx
2020.11.02_kpc_1_attachment_Barnes_WP_Fixed_Charge_EE_Impacts.xlsx
2020.11.02_kpc_1_attachment_EO18101111_Barnes_WP_Table_1.xlsx
2020.11.02_kpc_1_attachment_Fixed_Charge_Comparisons_Table_12_WP.xls
2020.11.02_kpc_1_attachment_GA_42516_Barnes_Calculations_Updated.xlsx

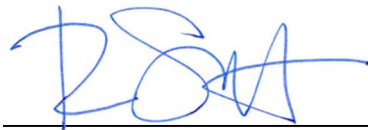
2020.11.02_kpc_1_attachment_NH_DE_17-189_Barnes_workpapers.xlsx
2020.11.02_kpc_1_attachment_PUR-2020-00015_Barnes_Workpapers.xlsx
2020.11.02_kpc_1_attachment_PUR_2019_00060_Barnes_Workpapers.xlsx
2020.11.02_kpc_1_attachment_SC_2018-318_E_Barnes_Rate_Design_Calculations.xlsx
2020.11.02_kpc_1_attachment_SC_2018-319-E_Barnes_Rate_Design_Calculations.xlsx
2020.11.02_kpc_1_NC_E-2_Sub_1142_WP.xlsx
2020.11.02_kpc_1_NC_E-2_Sub_1219_Barnes_Workpapers.xlsx
2020.11.02_kpc_9_attachment_sgip_public_export.xlsm

Due to the voluminous nature of the information in the Excel files and the difficulties inherent in converting the presentation of information from an electronic spreadsheet format to a reasonable printed page format, KYSEIA requests a deviation, in part, from the normal filing requirements of 807 KAR 5:001, Section 8. Specifically, in lieu of filing printed pages of the information in the Excel files, KYSEIA requests authorization to file the Excel files in electronic

format in a CD or thumb-drive when it files its paper copy of the response to the data requests of Kentucky Power Company. The provision of the Excel files in electronic format with the paper filing will match the provision of the Excel files in the electronic filing and is otherwise a fully accurate record of the information supplied in the electronic filing.

WHEREFORE, KYSEIA respectfully submits this motion to permit it to deviate from 807 KAR 5:001, Section 8, in part, and permit it to file the Excel files for its response to the data requests of Kentucky Power Company on a CD or thumb-drive in lieu of printed copies of the Excel files for the response.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'R. A. Strobo', written over a horizontal line.

Randal A. Strobo
Clay A. Barkley
David E. Spenard
STROBO BARKLEY PLLC
239 S. Fifth Street, Suite 917
Louisville, Kentucky 40202
Phone: 502-290-9751
Facsimile: 502-378-5395
Email: rstrobo@strobobarkley.com
Email: cbarkley@strobobarkley.com
Email: dspenard@strobobarkley.com
Counsel for KYSEIA

NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 12th day of November, 2020, and further certifies that the electronic version of the paper is a true and accurate copy of each paper filed in paper medium. Pursuant to the Commission's March 16, 2020, and March 24, 2020, Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus Covid-19*, the paper, in paper medium, will be filed at the Commission's offices within 30 days of the lifting of the state of emergency.



Randal A. Strobo

CERTIFICATE OF SERVICE

Undersigned counsel certifies that it has transmitted on this 12th day of November 2020, via electronic mail messages, a notice of the electronic filing of the response and the accompanying Read1st file for the electronic filing to the parties of record at the electronic mail addresses listed below. The Commission has not excused any party from electronic filing procedures for this case.

Mark R. Overstreet
Katie M. Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, Kentucky 40602-0634
moverstreet@stites.com
kglass@stites.com

Christen M. Blend
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, Ohio 43216
cblend@aep.com
Counsel for Kentucky Power Company

J. Michael West, Assistant Attorney General
Lawrence W. Cook, Assistant Attorney General
John G. Horne II, Assistant Attorney General
Angela M. Goad, Assistant Attorney General

Office of the Attorney General
700 Capital Avenue, Suite 20
Frankfort, Kentucky 40601
Michael.West@ky.gov
Larry.Cook@ky.gov
John.Horne@ky.gov
Angela.Goad@ky.gov
Counsel for the Attorney General, Daniel J. Cameron

Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
Counsel for KIUC

Joe F. Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, Kentucky 40507
joe@childerslaw.com

Matthew E. Miller
Sierra Club
2528 California Street
Denver, Colorado 80205
matthew.miller@sierraclub.org
Counsel for Sierra Club

Thomas J. FitzGerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, Kentucky 40602
fitzkrc@aol.com
*Counsel for Joint Intervenors Mountain Association, Kentuckians for the Commonwealth, and
Kentucky Solar Energy Society*

Michael A. Frye
Jenkins Fenstermaker, PLLC
325 Eight Street

Huntington, WV 25701
maf@JenkinsFenstermaker.com
lal@JenkinsFenstermaker.com
Counsel for SWVA Kentucky, LLC

Don C. A. Parker
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WV 25301
dparker@spilmanlaw.com

Barry A. Naum
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
bnaum@spilmanlaw.com

Carrie H. Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
cgrundmann@spilmanlaw.com
Counsel for Walmart Inc.



Randal A. Strobo