

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
KENTUCKY UTILITIES COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC RATES, A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY TO DEPLOY ADVANCED)	CASE NO. 2020-00349
METERING INFRASTRUCTURE,)	
APPROVAL OF CERTAIN REGULATORY)	
AND ACCOUNTING TREATMENTS, AND)	
ESTABLISHMENT OF A ONE-YEAR)	
SURCREDIT)	

MOTION FOR APPROVAL TO DEVIATE FROM RULE

Pursuant to 807 KAR 5:001, Section 22, Kentucky Utilities Company (“KU”) moves the Kentucky Public Service Commission (“Commission”) to grant KU 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, KU states:

1. On October 23, 2020, KU filed its Notice of Intent to file a rate application for a general adjustment in its electric rates, including changes to its electric tariffs, a Certificate of Public Convenience and Necessity to deploy advanced metering infrastructure, approval of certain regulatory and accounting treatments, and establishment of a one-year surcredit. KU subsequently filed its application on November 25, 2020.

2. On October 23, 2020, 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>.”

4. Pursuant to the Commission’s Rules of Procedure, KU 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 Item 122 of their Joint Initial Data Requests, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, (“AG”) and Kentucky Industrial Utility Customers, Inc. (“KIUC”) have requested: “With regard to Mr. Seelye’s LOLP study, provide all analyses, workpapers, spreadsheets, etc. showing the following: (a) forecasted hourly system Loss of Load Probability; (b) forecasted hourly system load (MW); (c) forecasted hourly forced outage MW (by unit as available); (d) forecasted hourly planned outage MW (by unit as available); (e) forecasted available generation production from KU/LG&E-owned facilities; (f) forecasted wholesale sales (if applicable or utilized in determining hourly LOLP); (g) forecasted wholesale purchased power (if applicable or utilized in determining hourly LOLP); and (h) forecasted required reserve margin (percent or MW as applicable). In this response, provide all data and formulae necessary to replicate each hourly system Loss of Load

¹ *Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit*, Case No. 2020-00349, PSC Acknowledgement Letter (Ky. PSC Oct. 23, 2020).

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

Probability. Provide all data in executable electronic (Excel) format. If data is not available in Excel format, provide ASCII common-delimited format with all fields defined.” KU used PROSYM software to assist in the preparation of the LOLP calculations that yielded files responsive to this data request. 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.

6. KU requests permission to deviate from 807 KAR 5:001, Section 8(3) by not uploading the requested PROSYM files to the Commission’s E-Filing System for the reasons stated above. Rather, KU is requesting permission to produce the PROSYM files using the HighQ site in a folder that will be available to the Commission and all parties to this case. In the alternative, KU will submit the files to the Commission on a portable electronic storage medium and produce a true and accurate copy of the files to the AG and KIUC and any other party who requests a copy using the HighQ site.

7. KU is making its above request to deviate pursuant to 807 KAR 5:001, Section 22.

WHEREFORE, KU 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 122 of the Joint Initial Data Requests of the AG and KIUC as proposed in this motion.

Dated: January 22, 2021

Respectfully submitted,



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CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Kentucky Utilities Company's January 22, 2021 electronic filing is a true and accurate copy of the document that will be filed in paper medium subject to the terms of 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) ("COVID-19 Orders"); that the electronic filing was transmitted to the Commission on January 22, 2021; 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 filed with the Commission consistent with the COVID-19 Orders.



Kenneth R. Rieps
Counsel for Kentucky Utilities Company