

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

**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.”<sup>1</sup>

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.<sup>2</sup>

5. In Item 18 of the Commission Staff’s Fifth Request for Information, Commission Staff has requested the Company’s 8,760 hours of load at each distribution substation for the most recent three years available in Excel format. The Excel spreadsheet that KU is submitting in response to this request contains three separate worksheets with more than 27,000 lines of data. The file size of this Excel spreadsheet exceeds the maximum file size accepted by the Commission’s E-Filing System and thus cannot be uploaded to the Commission’s website.

6. KU requests permission to deviate from 807 KAR 5:001, Section 8(3) by not uploading the Excel attachment to Item 18 of the Commission Staff’s Fifth Request for Information to the Commission’s E-Filing System for the reasons stated above. Rather, KU is requesting permission to produce the Excel attachment 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

---

<sup>1</sup> *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).

<sup>2</sup> 807 KAR 5:001, Section 8(4)(b), (c).

files to the Commission on a portable electronic storage medium and produce a true and accurate copy of the file to 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.

8. Pending the disposition of this motion, KU is producing the Excel attachment produced in response to Item 18 of the Commission Staff's Fifth Request for Information using the HighQ site in a folder that will be available to the Commission and all parties to this case.

**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 attachment in response to Item 18 of the Commission Staff's Fifth Request for Information as proposed in this motion.

Dated: April 1, 2021

Respectfully submitted,



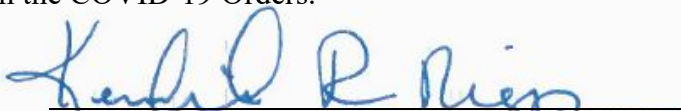
Kendrick R. Riggs  
Stoll Keenon Ogden PLLC  
500 West Jefferson Street, Suite 2000  
Louisville, Kentucky 40202-2828  
Telephone: (502) 333-6000  
Fax: (502) 627-8722  
kendrick.riggs@skofirm.com

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 Kentucky Utilities Company*

## CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Kentucky Utilities Company's April 1, 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 April 1, 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