

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

-and-

ELECTRONIC APPLICATION OF LOUISVILLE)
GAS & ELECTRIC CO. FOR AN ADJUSTMENT)
OF ITS ELECTRIC AND GAS RATES, A CERTIFI-)
CATE OF PUBLIC CONVENIENCE AND NECESSITY) CASE No.
TO DEPLOY ADVANCED METERING INFRA-) 2020-00350
STRUCTURE, APPROVAL OF CERTAIN)
REGULATORY AND ACCOUNTING TREATMENTS,)
AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT)

**JOINT MOTION OF THE ATTORNEY GENERAL AND KIUC FOR PARTIAL
DEVIATION FROM FILING REQUIREMENTS**

The intervenors, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention [“OAG”], and the Kentucky Industrial Utility Customers [“KIUC,” hereinafter referred to jointly as “Joint Movants”] hereby jointly move the Commission for a partial deviation from: (i) 807 KAR 5:0001 § 8 (3) and (12)(a), which require a paper copy of electronically filed documents to be filed with the Commission; and (ii) the Commission’s Procedural Order in the above-styled cases, requiring that the original paper filing to be filed with the Commission once the Governor lifts the current state of emergency. In support of this motion, Joint Movants state as follows.

On April 1, 2021, the OAG and KIUC, pursuant to the Commission's electronic filing procedures set forth in 807 KAR 5:001 § 8, filed their joint responses to data requests of Commission Staff, LG&E-KU, and other intervenors in the above-styled matters, which included certain Excel spreadsheet attachments consisting of the workpapers of witness Stephen J. Baudino, and an Excel spreadsheet exhibit from witness Richard Baudino. Additionally, on the same date the OAG, pursuant to the Commission's electronic filing procedures set forth in 807 KAR 5:001 § 8, filed responses to data requests from Commission Staff and from the intervenor, Department of Defense, which included certain Excel spreadsheet attachments consisting of exhibits from OAG witness Glenn Watkins.

Joint Movants seek deviation from the provisions of 807 KAR 5:0001 § 8 (3) and (12)(a), and the Commission's procedural order in the above-styled matters which require one hard copy of filings to be filed. Certain workpapers of Messrs. Baron and Baudino, identified more fully in the attached "Appendix A," and certain of Mr. Watkins' exhibits, also identified more fully in "Appendix A," are in their native Excel format, and as such, would be rendered nearly unidentifiable, not readily usable, and essentially meaningless if printed. Moreover, doing so would require approximately 6,000 pages, and an untold number of binders and bankers boxes within which to transport them. Joint Movants do not have the resources necessary to accomplish such an undertaking without going to extraordinary effort and incurring major expenses.

Once the Governor lifts the current state of emergency, Joint Movants intend to file all of the documents uploaded on April 1, 2021, which are in .PDF format, together with those Excel spreadsheets not identified on the attached "Appendix A" which are either not excessively voluminous, or would not be rendered meaningless by printing, or both. In further support of this motion, Joint Movants state that the documents for which they seek

partial deviation are already properly uploaded and are fully accessible on the Commission's website for the Commission and the parties to review.

WHEREFORE, Joint Movants respectfully request that the Commission grant their motion for partial deviation from the requirement that a paper copy of the specified documents be filed once the Governor has lifted the current state of emergency.

Respectfully submitted,

DANIEL CAMERON
ATTORNEY GENERAL











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—and—

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APPENDIX A

Case Nos. 2020-00349 and 2020-00350

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-  PSC DR 10 Baudino_LGE KU 2021 ROE
 -  T-1, T-3 2020_AG-KIUC_DR1_LGE_Attach_to_Q188_-_att_1_LGE_6CP_COSS_with_Unit_Costs
 -  T-2, T-4 2020_AG-KIUC_DR1_KU_Attach_to_Q188_-_Att_1_KU_6CP_COSS_with_Unit_Costs
 -  T-7 2020_AG-KIUC_DR1_LGE_Attach_to_Q188_-_att_3_LGE_LOLP_COSS_with_Unit_Costs-sjb
 -  T-8 2020_AG-KIUC_DR1_KU_Attach_to_Q188_-_Att_3_KU_LOLP_COSS_with_Unit_Costs-sjb
 -  Watkins Attach PSC Question 13
 -  Attachment to KU - DOD Question 1 (KU)
 -  Attachment to LGE - DOD Question 1 (LGE)

Certificate of Service

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record. Further, the Attorney General will submit the paper originals of the foregoing to the Commission within 30 days after the Governor lifts the current state of emergency.

This 7th day of April, 2021



Assistant Attorney General