

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2021 JOINT INTEGRATED)
RESOURCE PLAN OF LOUISVILLE GAS) CASE NO. 2021-00393
AND ELECTRIC COMPANY AND)
KENTUCKY UTILITIES COMPANY)

JOINT MOTION FOR APPROVAL TO DEVIATE FROM RULE

Pursuant to 807 KAR 5:001, Section 22, Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, the “Companies”) move the Kentucky Public Service Commission (“Commission”) to grant the Companies 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, the Companies state:

1. On October 19, 2021, the Companies filed their Integrated Resource Plan.
2. On November 12, 2021, the Commission established this proceeding and ordered, “Any party filing a paper with the Commission shall file an electronic copy in accordance with the electronic filing procedures set forth in 807 KAR 5:001, Section 8.”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, the Companies must electronically upload to the Commission’s E-Filing System all filings made in this case. The

¹ *Electronic 2021 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, Case No. 2021-00393, Order at 1 (Ky. PSC Nov. 12, 2021).

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. Item 1.3 of the Joint Intervenors' Initial Request for Information states, "Produce any workpapers (in machine readable and unprotected format, with formulas intact) used to produce the load forecast, the reserve margin analysis, the long-term resource planning analysis (including Table 20 of the same), and the RTO membership analysis."³ The data the Companies are providing in response is voluminous, consisting of more than 1,000 files and multiple gigabytes of data. In addition, to maintain order and intelligibility across such a vast set of files requires keeping intact a folder structure to organize the data.

6. Item 5 of the Sierra Club's Initial Request for Information asks the Companies to "identify and produce any request(s) the Compan[ies] ha[ve] issued, from 2018 through the present, for proposals for new or substitute generation capacity, along with any responses thereto." A portion of the information the Companies are providing in response to the request is confidential, and it is therefore not the subject of this request. The non-confidential portion of the information the Companies are providing in response is voluminous, consisting of nearly 200 files and more than 270 MB of data.

7. The Companies request permission to deviate from 807 KAR 5:001, Section 8(3) by not uploading the requested files to the Commission's E-Filing System for the reasons stated above. Rather, the Companies are requesting permission to produce the responsive files using the HighQ site maintained by the Companies' counsel and already in use in this proceeding for confidential information. The responsive files that are not confidential will be in a folder that will

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

³ The Joint Intervenors are the Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association.

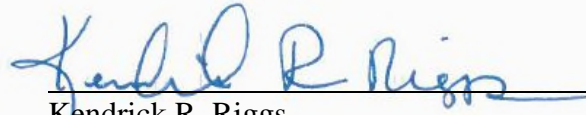
be available to the Commission and all parties to this case, as well as the public. For the response to Joint Intervenors 1.3, the data is available to the public at <https://highq.in/h17yfxqx5f>. For the response to Sierra Club 5, the data is available to the public at <https://highq.in/h18u2sgzou>.

8. The Companies are making this request to deviate pursuant to 807 KAR 5:001, Section 22.

WHEREFORE, the Companies request 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 their response to Item 1.3 of the Joint Intervenors' Initial Request for Information and their response to Item 5 of the Sierra Club's Initial Request for Information as proposed in this motion.

Dated: February 11, 2022

Respectfully submitted,

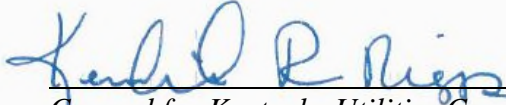


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CERTIFICATE OF COMPLIANCE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on February 11, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*