

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	CASE NO. 2022-00402
AND SITE COMPATIBILITY)	
CERTIFICATES AND APPROVAL OF A)	
DEMAND SIDE MANAGEMENT PLAN)	

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 “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 November 18, 2022, the Commission established this proceeding and ordered, “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, Section 8.”¹

2. 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>.”

¹ *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Site Compatibility Certificates and Approval of a Demand Side Management Plan*, Case No. 2022-00402, Letter at 1 (Ky. PSC Nov. 18, 2022).

3. On October 6, 2022, the Commission granted deviations for electronic filing requirements in 807 KAR 5:001, Section 8(2), (4), and (6) in Case No. 2022-00311. The deviations permit the electronic filing of zip files up to 50 MB. The Order also encourages electronic filers with electronic filing questions to contact the Commission Staff's Filings Branch for assistance.

4. In response to Joint Intervenors' ("JI") Initial Data Requests Item No. 1.36, the Companies are producing one Excel file that exceeds 50 MB. The Companies' counsel discussed this file with the Commission Staff's Filings Branch on March 7, 2023, and March 8, 2023. The Filings Branch suggested various methods to reduce the file size, including separating the file, zipping the file, and converting the file into an .XLS Excel file. The Companies attempted to reduce the file size with these methods but are unable to reduce it to less than 50 MB without losing the functionality of the file. Because the Companies could not reduce the file to a size that can be uploaded to the electronic filing system, the Filings Branch advised the Companies' counsel to file a Motion to Deviate and provide a thumb drive containing the large attachment to JI 1.36 to the Commission.

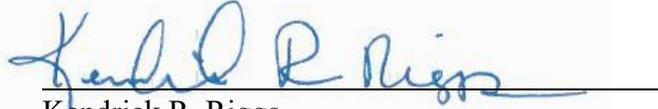
5. Therefore, the Companies request permission to deviate from 807 KAR 5:001, Section 8, as modified by the Commission's Order in Case No. 2022-00311, by not uploading the voluminous attachment to JI 1.36 to the Commission's E-Filing System for the reasons stated above. Rather, the Companies will provide the attachment to JI 1.36 that cannot be uploaded, on a thumb drive being hand-delivered to the Commission on March 10, 2023.

6. 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 one attachment to JI 1.36 as proposed in this motion.

Dated: March 10, 2023

Respectfully submitted,



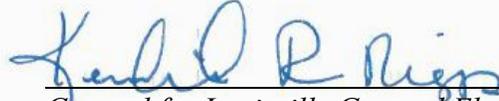
Kendrick R. Riggs
Stoll Keenon Ogden PLLC
500 West Jefferson Street, Suite 2000
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
Fax: (502) 627-8722
kendrick.riggs@skofirm.com

Allyson K. Sturgeon
Vice President and Deputy General Counsel
PPL Services Corporation
Sara V. Judd
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
ASturgeon@pplweb.com
SVJudd@pplweb.com

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

CERTIFICATE OF SERVICE

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 March 10, 2023, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink, appearing to read "Gerald R. Rigns", is written over a horizontal line.

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