

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

**ELECTRONIC APPLICATION OF)
BLUEGRASS WATER UTILITY) Case No. 2022-00432
OPERATING COMPANY, LLC FOR)
AN ADJUSTMENT OF SEWAGE RATES)**

**ATTORNEY GENERAL'S MOTION FOR DEVIATION FROM
ELECTRONIC FILING PROCEDURES AND FORMATTING
REQUIREMENTS**

The Attorney General of the Commonwealth of Kentucky (“Attorney General”), through his Office of Rate Intervention, hereby moves the Commission to issue an order deviating from the requirement that parties upload an electronic version of all papers filed in this proceeding to the Commission’s website using the Commission’s E-Filing System and deviating from formatting requirements.

807 KAR 5:001 § 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>.”

In response to Data Request 9 from the Applicant, the Attorney General will produce records in excess of 1.3 GB, exceeding the limitations for uploading onto the Commission’s E-Filing System. The Attorney General will deliver a thumb drive to the Commission containing these documents and will serve the same on the other parties.

Further, 807 KAR 5:001 § 8(3) provides: “Except as established in paragraph (a) of this subsection, each file in an electronic submission shall be: 1. In portable

document format; 2. Search-capable; 3. Optimized for viewing over the Internet; 4. Bookmarked to distinguish sections of the paper, except that documents filed in response to requests for information need not be individually bookmarked; and 5. If scanned material, scanned at a resolution of 300 dots per inch.”

A substantial majority of the documents to be produced, 1.31 GB, are documents the Attorney General received from the Energy and Environment Cabinet. The native formatting for those documents is a mix of PDF, word documents, powerpoints, and excel documents in a number of subfolders. It would be unduly burdensome to require the Attorney to modify the organization of those folders and subfolders and reformat those files. As such, the Attorney General requests the ability to provide those documents to the Commission, requestor, and the other intervenor in substantially the same format it received those documents from the Cabinet. Understandably, this will make public display of those documents difficult. The Attorney General yields to the Commission on how that can be effectively accomplished, but one possibility would be making the drive available for in-person review at the Commission with a related notice placed in the case record.

Therefore, the Attorney General requests deviation from the requirement that these documents be filed through the E-filing System and further requests that the documents be allowed to be served in the document’s native format.

Respectfully submitted,

DANIEL J. CAMERON
ATTORNEY GENERAL

A handwritten signature in blue ink that reads "J. Michael West". The signature is written in a cursive style with a long horizontal flourish at the end.

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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on July 31, 2023, a copy of the forgoing was served via the Commission's electronic filing system.

this 31st day of July, 2023.

A handwritten signature in blue ink, appearing to read "J. Michael West". The signature is written in a cursive style with a long horizontal stroke at the end.

Assistant Attorney General