

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

APPLICATION OF KENTUCKY POWER
COMPANY FOR APPROVAL OF ITS
2011 ENVIRONMENTAL COMPLIANCE
PLAN, FOR APPROVAL OF ITS
AMENDED ENVIRONMENTAL COST
RECOVERY SURCHARGE TARIFF, AND
FOR THE GRANTING OF A
CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY FOR
THE CONSTRUCTION AND
ACQUISITION OF RELATED
FACILITIES

CASE NO. 2011-00401

RECEIVED

APR 03 2012

PUBLIC SERVICE
COMMISSION

**TOM VIERHELLER, BEVERLY MAY, AND THE SIERRA CLUB'S MOTION TO
DEVIATE FROM FILING REQUIREMENTS WITH RESPECT TO THEIR
OBJECTIONS AND RESPONSES TO KENTUCKY POWER
COMPANY'S FIRST INFORMATION REQUEST**

Intervenors Tom Vierheller, Beverly May, and Sierra Club (collectively "Environmental Intervenors") move the Kentucky Public Service Commission ("Commission"), pursuant to 807 KAR 5:001 Section 14, for leave to deviate from the filing requirements in this proceeding.

Environmental Intervenors request that the Commission excuse them from filing paper copies of certain of its responses and attachments to Kentucky Power Company's First Set of Information Requests because of their voluminous nature. In support of its motion, Environmental

Intervenors state:

1. Pursuant to the Commission's December 28, 2011 Order in this matter, Environmental Intervenors are required to file an original and 10 copies of all data responses and attachments, along with a service copy to all parties of record.

2. Certain attachments to the responses are voluminous, some totaling thousands of pages.
3. Many of these data files, in paper form, would be of little, if any, practical use to the Commission or Kentucky Power Company, and in fact that is why Kentucky Power Company asked the Environmental Intervenors for them in electronic format.

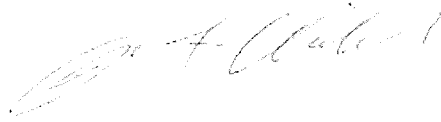
Environmental Intervenors request permission to deviate from the Commission's Order and other filing requirements as follows:

- (1) A paper original and 12 paper copies will be filed of all documents less than 100 pages.
- (2) A paper "original" will be filed of all documents 100-499 pages in size. The remaining copies will be provided as electronic files.
- (3) Electronic originals and copies will be filed of all copies 500 pages or larger.

Environmental Intervenors also request leave to serve electronic copies of those documents being provided electronically to the Commission.

WHEREFORE, Environmental Intervenors request leave to file electronic copies of its Responses to Kentucky Power Company's First Set of Information Requests in the manner set forth above.

Respectfully submitted,



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Dated: April 2, 2012

CERTIFICATE OF SERVICE

I certify that I mailed a copy of Environmental Intervenors Tom Vierheller, Beverly May, and Sierra Club's Motion to Deviate by first class mail on April 2, 2012 to the following:

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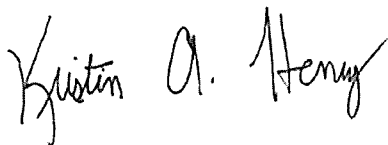
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