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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

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In the Matter of:

Application of Big Rivers Electric)
Corporation for a General) Case No. 2012-00535
Adjustment in Rates)

MOTION FOR DEVIATION

Pursuant to 807 KAR 5:001 Section 21, Big Rivers Electric Corporation (“Big Rivers”) hereby moves the Kentucky Public Service Commission (“Commission”) for a deviation from (i) the requirement that Big Rivers file a hard copy original and ten paper copies of its responses to certain data requests, and (ii) the requirement in 807 KAR 5:001 Section 13 that Big Rivers file a redacted hard copy and ten highlighted hard copies of material containing confidential information submitted under a petition for confidential treatment.

Big Rivers is filing with this motion its responses to the Initial Requests for Information of Kentucky Industrial Utility Customers, Inc. (“KIUC”), the Office of the Attorney General (“AG”), and Alcan Primary Products Corporation (“ALCAN”), and the Second Request for Information of the Commission’s Staff. Big Rivers’ responses contain a hardcopy original and ten paper copies of its narrative responses and all attachments, except that certain attachments are provided only electronically (the “Electronic Attachments”). Each Electronic Attachment is provided either on a PUBLIC CD attached to the original

1 and each copy of the associated response, or on a CONFIDENTIAL CD
2 filed under a petition for confidential treatment.

3 The Electronic Attachments fall into three categories that justify
4 deviation from the Commission's traditional filing rules.

5 First, many Electronic Attachments are provided in response to
6 data requests that explicitly seek electronic versions of documents. Big
7 Rivers is providing these attachments in electronic format only. The
8 Electronic Attachments in this category include attachments to the
9 following data requests: KIUC 1-13, AG 1-7, AG 1-34, AG 1-79, AG 1-80,
10 AG 1-93, AG 1-119, AG 1-127, AG 1-128, AG 1-131, AG 1-140, AG 1-
11 150, AG 1-153, AG 1-186, AG 1-233, AG 1-245, AG 1-246, and AG 1-
12 267.

13 Second, some of the Electronic Attachments are voluminous and, if
14 printed, would exceed 100 pages. Big Rivers is providing two hard copies
15 of these voluminous attachments with this motion, with the exception of
16 a limited number of extremely large attachments that are being provided
17 in electronic format only. The Electronic Attachments in this category
18 include attachments to the following data requests: KIUC 1-1, KIUC 1-2,
19 KIUC 1-3, KIUC 1-7, KIUC 1-34, PSC 2-8(a), PSC 2-21(b), PSC 2-23, AG
20 1-10, AG 1-32, AG 1-37, AG 1-46, AG 1-86, AG 1-88, AG 1-156, AG 1-
21 165, AG 1-166, AG 1-167, AG 1-179, AG 1-249, and AG 1-250.

22 Third, certain Electronic Attachments consist of spreadsheets or
23 other electronic documents that cannot readily be provided in hard copy

1 because they are designed for viewing on a computer and, if printed,
2 would be voluminous or extremely difficult to read, or would lose critical
3 information (such as formulas stored in Excel spreadsheets). Big Rivers
4 is providing these attachments in electronic format only. The Electronic
5 Attachments in this category include attachments to the following data
6 requests: AG 1-17, AG 1-89, AG 1-181, AG 1-183, AG 1-231, AG 1-234,
7 AG 1-236, AG 1-246, AG 1-275, and many of the Electronic Attachments
8 provided in response to requests that specifically seek an electronic or
9 “formulas intact” version.

10 Also, as noted in Big Rivers’ petition for confidential treatment,
11 some of the Electronic Attachments described above are being redacted
12 in their entirety because they are spreadsheets and Big Rivers cannot
13 disaggregate the confidential material from those files without making
14 other cells in the spreadsheet unusable.

15 WHEREFORE, Big Rivers respectfully requests that the
16 Commission enter an order granting a deviation to Big Rivers from (i) the
17 requirement to file paper copies of the attachments to its responses to
18 the above data requests, and (ii) the requirement in 807 KAR 5:001
19 Section 13 that Big Rivers file a redacted hard copy and ten highlighted
20 hard copies of material containing confidential information submitted
21 under a petition for confidential treatment.

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23 On this the 28th day of February, 2013.

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Respectfully submitted,

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Counsel for Big Rivers Electric
Corporation

Certificate of Service

I certify that a true and accurate copy of the foregoing was or will be served by Federal Express or by hand delivery upon the persons listed on the attached service list, on the date this petition is filed with the Kentucky Public Service Commission or the following day.

On this the 28th day of February, 2013,

Counsel for Big Rivers Electric
Corporation