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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY MAR 28 2013

PUBLIC SERVICE
COMMISSION

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 an unredacted hard copy and ten redacted 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 Second Set of Data Requests from Kentucky Industrial Utility Customers, Inc. (“KIUC”), the Supplemental Set of Data Requests from the Office of the Attorney General (“AG”), and the Third Request for Information from the Commission 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 and each copy of the associated response, or on a CONFIDENTIAL CD filed under a petition for confidential treatment.

1 The Electronic Attachments fall into three categories that justify deviation from
2 the Commission’s traditional filing rules.

3 First, some Electronic Attachments are provided in response to data requests that
4 explicitly seek electronic versions of documents. Big Rivers is providing these
5 attachments in electronic format only. The Electronic Attachments in this category are
6 the attachments for the responses to KIUC 2-20(a) and (b), which appear on a PUBLIC
7 CD.

8 Second, some of the Electronic Attachments are voluminous and, if printed,
9 would exceed 100 pages each. Attachment 1 for the response to AG 2-7 and Attachment
10 2 for the response to AG 2-53(e) each appear on a respective PUBLIC CD, and Big
11 Rivers is providing one hard copy of these voluminous public attachments with its filing.
12 Attachments 7, 9, and 10 for the response to AG 2-7 appear on the CONFIDENTIAL
13 CD. Because the entirety of Attachments 7, 9 and 10 are subject to the petition for
14 confidential protection, Big Rivers is providing these attachments in electronic format
15 only.

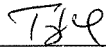
16 Third, certain Electronic Attachments consist of spreadsheets or other electronic
17 documents that cannot readily be provided in hard copy because they are designed for
18 viewing on a computer and, if printed, would be voluminous or extremely difficult to
19 read, or would lose critical information (such as formulas stored in Excel spreadsheets).
20 Big Rivers is providing these attachments in electronic format only. The Electronic
21 Attachments in this category are the attachments to AG 2-8(c)(ii), AG 2-8(d)(i), and AG
22 2-8(d)(iv), which appear on the CONFIDENTIAL CD.

Certificate of Service

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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 March, 2013,



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