REGARD LAW GROUP, PLLC

501 Darby Creek Road Suite 46 Lexington, Kentucky 40509

August 28, 2018

Gwen R. Pinson Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40502 T. (859) 533-0781 F. (859) 402-2201 aregard@regardlaw.com

RECEIVED

AUG 2 9 2018

PUBLIC SERVICE COMMISSION

Re: Case No. 2018-00181; Sanctuary Church v. Louisville Gas and Electric

Dear Ms. Pinson:

Please find enclosed the original and ten copies of Sanctuary Church's Motion for Use of Electronic Filing Procedures.

Sincerely,

Andre F. Regard Regard Law Group PLLC 501 Darby Creek Rd. Suite 46 Lexington, KY 40509 aregard@regardlaw.com

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COMMONWEALTH OF KENTUCKY

AUG 2 9 2018

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

VS.

CASE NO.
2018-00181

SANCTUARY CHURCH'S MOTION FOR USE OF ELECTRONIC FILING PROCEDURES

Pursuant to 807 KAR 5:001, Sanctuary Church moves the Public Service Commission (the "Commission") to require the use of electronic filing procedures in this proceeding. In support of its Motion, Sanctuary Church states as follows:

- The Commission's Rules of Procedure, 807 KAR 5:001, permit the use of electronic filing in Section 8. An applicant may elect to use electronic filing, or the Commission may require filing by Order.¹
- Section 8 requires an applicant to submit its notice 7 days prior to its application, however the rule does not prohibit a complainant from moving the Commission to require electronic filing.
- 3. Counsel for Sanctuary Church have registered with the Public Service Commission website to enable electronic filing capability.

¹ 807 KAR 5001 Sec. 8(1)

- Sanctuary Church's counsel and authorized representative's electronic mail information is set forth below.
- 5. Sanctuary Church's counsel and authorized representatives have read and understand the policies and procedures for electronic filing set forth in 807 KAR 5:007, Section 8.
- 6. The Commission has previously granted motions for use of electronic filing when a party, who is not an applicant, moves the court after the commencement of a case to require electronic filing.² In the *Muhlenberg County Water District* case, the Commission held that electronic filing should be permitted as the case was in the early stages, no parties had sought intervention, and there were no objections from other parties.
- 7. This case is in the early stages, only just past the date for initial requests for information which all parties submitted on August 27, 2018. There is currently no evidence that other parties seek to intervene. Additionally, Sanctuary Church has obtained agreement from counsel for LG&E to use electronic filing procedures. Electronic filing procedures will reduce filing costs for all parties and encourage efficiency.

WHEREFORE, Sanctuary Church moves that the Commission enter an order to designate this proceeding as an electronic filing proceeding under 807 KAR 5:001.

Respectfully submitted,

Andre F. Regard Regard Law Group PLLC 501 Darby Creek Rd. Suite 46 Lexington, KY 40509 aregard@regardlaw.com Counsel for Sanctuary Church

² William C. Hill v. Muhlenberg Country Water District, Case No. 2017-00316, Order (Ky. PSC Nov. 29, 2017)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct electronic copy of the foregoing Motion was served on the following persons by electronic mail using the electronic mail addresses shown below and a true and correct copy in paper medium of the same was served by placing the same in the U.S. Mail for delivery to the addresses shown below all on the 28th day of August 2018:

Allyson K. Sturgeon Managing Senior Counsel - Regulatory and Transactions LG&E and KU Services Company 220 West Main Street Louisville, Kentucky 40202 (502) 627-2088 allyson.sturgeon@lge-ku.com *Counsel for Louisville Gas and Electric Company*

Andre F. Regard Regard Law Group PLLC 501 Darby Creek Rd. Suite 46 Lexington, KY 40509 <u>aregard@regardlaw.com</u> *Counsel for Sanctuary Church*