

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAY 8 - 2014

PUBLIC SERVICE
COMMISSION

PSC CASE NO. 2013-00052

IN THE MATTER OF:

ROY G. COLLINS

v.

JACKSON PURCHASE ENERGY CORPORATION

**JACKSON PURCHASE ENERGY CORPORATION'S REPOSE TO COMMISSION
STAFF'S POST-HEARING DATA REQUESTS AND MOTION FOR
CONFIDENTIALITY**

Jackson Purchase Energy Corporation ("JPEC") for its Response to Commission Staff's Post-Hearing Data Request states as follows:

1. The Commission staff has requested that Jackson Purchase Energy Corporation provide it with a copy of the recorded conversations between Mr. Collins and JPEC customer service representatives. Copies of said recordings are attached hereto.

Witness: Charles G. Williamson III, Vice President of Finance and Accounting.

2. JPEC hereby requests that said recordings be filed as and remain confidential as they contain information of a sensitive nature pertaining to Mr. Collins which JPEC is certain Mr. Collins would not want to have disclosed. Included in these recordings is personally identifying information such as Mr. Collins social security number.

3. KRS 61.878 (1)(a) provides that, "[p]ublic records containing information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy" are excluded from the public inspection requirement of the Kentucky Open Records Act, KRS 61.870 *et seq*, absent a court order.

4. Mr. Collins has a significant privacy interest at stake. Kentucky private citizens have a “more than *de minimus* interest in the confidentiality of the personally identifiable information collected from them by the state.” *Kentucky New Era, Inc. v. City of Hopkinsville*, 415 S.W.3d 76, 85 (Ky. 2013). Disclosure of Mr. Collins’ personal information could cause him significant harm and there is no significant public interest in the disclosure of such information.

5. Furthermore, KRS 61.878 (1)(i) provides that, “preliminary notes, drafts, correspondence with private individuals” are also excluded from public disclosure unless “intended to give notice of final action of a public agency.” The recordings attached hereto constitute correspondence with a private individual and do not give notice of a final action.

For the reasons set forth herein, JPEC respectfully requests that the Commission grant confidential protection of the recorded conversations between Mr. Collins and JPEC customer service representatives at issue.

Respectfully Submitted,

Denton & Keuler, LLP
PO Box 929
Paducah KY 42002-0929
Phone: (270) 443-8253
Fax: (270) 442-6000

By: 

Melissa D. Yates

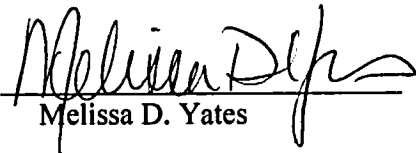
I hereby certify that the foregoing has
been served a true and correct copy via
Federal Express:

MR JEFF DEROUEN
KENTUCKY PUBLIC SERVICE COMMISSION
211 SOWER BLVD
FRANKFORT KY 40602

And by delivering a copy via U.S. Mail and email to:

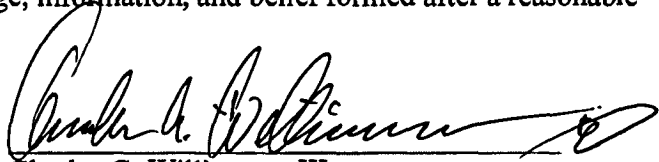
MR ROY G COLLINS
109 DICKENSON STREET
MANCHESTER KY 40962

on this 7th day of May, 2014.

By: 
Melissa D. Yates

VERIFICATION

I, Charles G. Williamson III, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that data response is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

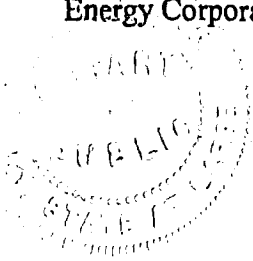


Charles G. Williamson III
Vice President of Finance and Accounting

COMMONWEALTH OF KENTUCKY)

COUNTY OF MCCRACKEN)

Subscribed, sworn to, and acknowledged to before me this 7th day of May, 2014, by Charles G. Williamson, III, Vice President of Finance and Accounting of Jackson Purchase Energy Corporation.



Sonja Collier # 507484
Notary Public, State at Large

My Commission Expires 03/21/2018