

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

APPLICATION OF LOUISVILLE GAS & ELECTRIC
COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC
AND GAS RATES AND FOR CERTIFICATES OF
PUBLIC CONVENIENCE AND NECESSITY

Case No. 2016-00371

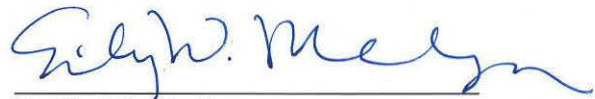
**THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL
EXECUTIVE AGENCIES' MOTION FOR CONFIDENTIAL PROTECTION**

Pursuant to 807 KAR 5:001, Section 13 and KRS 61.878(1), The United States Department of Defense and all other Federal Executive Agencies (DoD/FEA) hereby move for confidential protection for the items described herein. KRS 61.878(c)(1) provides that disclosure of generally recognized confidential or proprietary information is exempt from the Kentucky Open Records Act if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records. Included in the response to Commission Staff's Requests for Information Number 8 and referenced in the responses to Louisville Gas & Electric Company's Requests for Information Numbers 4, 5 and 6 are Christopher C. Walters' work papers containing confidential and proprietary information of companies that provide industry data and research. These companies provide this information through subscription services, and it is not readily available to the public without a subscription. These companies developed the information through extensive research, and if publicly disclosed, would work to their commercial disadvantage. Public disclosure of this confidential information would harm DoD/FEA's ability to obtain experts in the future by discouraging experts from fully and candidly assisting DoD/FEA due to confidentiality concerns.

DoD/FEA will disclose the confidential information, pursuant to a confidentiality agreement, to all parties of record with a legitimate interest in the information and as required by the Commission. In compliance with 807 KAR 5:001, Section 8(3), Section 13(2)(e) and the Commission's Order dated December 13, 2016, DoD/FEA is filing with the Commission one paper copy that identifies the information for which confidential protection is sought. Due to the sensitive nature of the information at issue, DoD/FEA requests that confidential protection be granted for an indefinite period of time.

WHEREFORE, DoD/FEA respectfully requests that the Commission grant confidential protection for the information described herein.

Respectfully submitted,



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