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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)

**PETITION OF BIG RIVERS ELECTRIC CORPORATION FOR CONFIDENTIAL
PROTECTION**

1. Big Rivers Electric Corporation (“Big Rivers”) hereby petitions the Kentucky Public Service Commission (“Commission”), pursuant to 807 KAR 5:001 Section 13 and KRS 61.878, to grant confidential protection to certain information Big Rivers is filing with 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’s Staff, all dated March 14, 2013. The information Big Rivers seeks to protect as confidential is hereinafter referred to as the “Confidential Information.”

2. The Confidential Information includes:

- a. portions of the responses and/or attachments for the responses to Items 3, 22, 24, 37, 38, 39, 44, 45, 51, and 56 of KIUC’s Second Set of Data Requests (“KIUC 2-3,” “KIUC 2-22,” “KIUC 2-24,” “KIUC 2-37,” “KIUC 2-38,” “KIUC 2-39,” “KIUC 2-44,” “KIUC 2-45,” “KIUC 2-51,” and “KIUC 2-56,” respectively);
- b. portions of responses and/or attachments for the responses to Items 7, 8, 10, 13, 24, 30, 33, 44, 45, 46, 47, 48, 50, 53, 56, 57, and 63 of the AG’s Supplemental Set of Data Requests (“AG 2-7,” “AG 2-8,” “AG 2-10,” “AG 2-13,” “AG 2-24,” “AG

1 2-30,” “AG 2-33,” “AG 2-44,” “AG 2-45,” “AG 2-46,” “AG 2-47,” “AG 2-48,”
2 “AG 2-50,” “AG 2-53,” “AG 2-56,” “AG 2-57,” and “AG 2-63,” respectively);

3 c. portions of the responses and/or attachments for the responses to Items 1, 2, 4, 5,
4 9, 10, 15, and 16 of the Commission Staff’s Third Request for Information (“PSC
5 3-1,” “PSC 3-2,” “PSC 3-4,” “PSC 3-5,” “PSC 3-9,” “PSC 3-10,” “PSC 3-15,”
6 and “PSC 3-16,” respectively).

7 3. One (1) copy of the hardcopy pages containing Confidential Information, with the
8 Confidential Information highlighted with transparent ink, printed on yellow paper, or otherwise
9 marked “CONFIDENTIAL,” and a CONFIDENTIAL CD containing confidential electronic
10 attachments, are being filed with this petition. A copy of those pages and a PUBLIC CD, with
11 the Confidential Information redacted, is being filed with the original and each of the ten (10)
12 copies of the responses to the information requests filed with this petition. 807 KAR 5:001
13 Sections 13(2)(a)(3) and 13(2)(b).

14 4. A copy of this petition with the Confidential Information redacted has been served
15 on all parties to this proceeding. 807 KAR 5:001 Section 13(2)(c). A copy of the Confidential
16 Information has been served on all parties that have signed a confidentiality agreement.

17 5. The Confidential Information is not publicly available, is not disseminated within
18 Big Rivers except to those employees and professionals with a legitimate business need to know
19 and act upon the information, and is not disseminated to others without a legitimate need to
20 know and act upon the information.

21 6. If and to the extent the Confidential Information becomes generally available to
22 the public, whether through filings required by other agencies or otherwise, Big Rivers will

1 notify the Commission and have the information's confidential status removed. 807 KAR 5:001
2 Section 13(10)(b).

3 7. As discussed below, the Confidential Information is entitled to confidential
4 protection based upon KRS 61.878(1)(m) or KRS 61.878(1)(c)(1). 807 KAR 5:001 Section
5 13(2)(a)(1); KRS 61.878(1)(c)(1).

6 **I. Information Protected by KRS 61.878(1)(m)**

7 8. KRS 68.878(1)(c)(1) protects “[p]ublic records the disclosure of which would
8 have a reasonable likelihood of threatening the public safety by exposing a vulnerability in
9 preventing, protecting against, mitigating, or responding to a terrorist act. . . .”

10 9. The Confidential Information contained in the response to AG 2-30 includes
11 information regarding operational risks and stability of Big Rivers’ generating and transmission
12 systems.

13 10. Public disclosure of this Confidential Information would threaten public safety by
14 exposing vulnerability in Big Rivers’ electric generation and transmission systems. This
15 information is thus entitled to confidential protection under KRS 68.878(1)(c)(1).

16 **II. Information Protected By KRS 61.878(1)(c)(1)**

17 11. KRS 61.878(1)(c)(1) protects “records confidentially disclosed to an agency or
18 required by an agency to be disclosed to it, generally recognized as confidential or proprietary,
19 which if openly disclosed would permit an unfair commercial advantage to competitors of the
20 entity that disclosed the records.” The Confidential Information Big Rivers provides in the
21 responses and/or attachments for the responses is entitled to confidential protection under this
22 provision.

1 **A. Big Rivers Faces Actual Competition.**

2 12. Big Rivers, as a participant in the credit markets and the wholesale power
3 markets, faces economic competition from other entities.

4 13. Big Rivers competes in the wholesale power market to sell energy it produces in
5 excess of its members' needs. Big Rivers' ability to successfully compete in the wholesale
6 power market is dependent upon a combination of its ability to negotiate the maximum price for
7 the power sold and its ability to keep its cost of production as low as possible. If Big Rivers'
8 cost of producing a kilowatt-hour of energy increases, its ability to sell that kilowatt-hour in
9 competition with other utilities is adversely affected. As is well documented in multiple
10 proceedings before this Commission, Big Rivers' margins are derived almost exclusively from
11 its off-system sales.

12 14. Big Rivers also competes for reasonably priced credit in the credit markets, and
13 its ability to compete is directly impacted by its financial results. Any event that adversely
14 affects Big Rivers' margins will adversely affect its financial results and potentially impact the
15 price it pays for credit. As was described in the proceeding before this Commission in the Big
16 Rivers Unwind Transaction, P.S.C. Case No. 2011-00036, Big Rivers expects to be in the credit
17 markets on a regular basis in the future.¹

18 15. As is evidenced by these economic pressures, Big Rivers has "competitors" as is
19 contemplated under the statute and faces actual competition from other market participants.

¹ See Order dated March 6, 2009, in *In the Matter of: Joint Application of Big Rivers, E.ON, LG&E Energy Marketing, Inc., and Western Kentucky Energy Corporation for Approval to Unwind Lease and Power Purchase Transactions*, P.S.C. Case No. 2007-00455, pages 27-30 and 37-39.

1 **B. The Confidential Information is Generally Recognized as Confidential**
2 **or Proprietary.**

3
4 16. The Confidential Information for which Big Rivers seeks confidential treatment
5 under KRS 61.878(1)(c)(1) is generally recognized as confidential or proprietary under Kentucky
6 law.

7 17. The Confidential Information contained in the attachment for the response to
8 KIUC 2-3(f) includes Big Rivers' heat rates and projected fuel costs.

9 18. The Confidential Information contained in the attachment for the response to
10 KIUC 2-22(a) includes a breakdown of Big Rivers' projected fixed production costs.

11 19. The Confidential Information contained in the attachments for the response to
12 KIUC 2-24 includes information about Big Rivers' off-system sales of excess capacity and
13 reveals the content of material previously submitted under a petition for confidential treatment.

14 20. The Confidential Information contained in the response to KIUC 2-37 includes
15 information about negotiations for off-system sales of excess capacity.

16 21. The Confidential Information contained in the response to KIUC 2-38 includes
17 information about negotiations for off-system sales of excess capacity and reveals the content of
18 material previously submitted under a petition for confidential treatment.

19 22. The Confidential Information contained in the response to KIUC 2-39 includes
20 information about negotiations for off-system sales of excess capacity.

21 23. The Confidential Information contained in the attachment for the response to
22 KIUC 2-44 includes information about Big Rivers' projected and historic off-system sales of
23 excess capacity.

1 24. The Confidential Information contained in the attachment for the response to
2 KIUC 2-45(b) includes information about planned outages, negotiations for credit, and projected
3 operation and maintenance (“O&M”) expenses.

4 25. The Confidential Information contained in the attachment for the response to
5 KIUC 2-51 includes information about off-system sales of excess capacity and projected O&M
6 costs.

7 26. The Confidential Information contained in the response and the attachment for the
8 response to KIUC 2-56 includes information about projected fixed production costs.

9 27. The Confidential Information contained in the attachments for the response to AG
10 2-7 includes proprietary information detailing Big Rivers’ O&M expenses, budget and sales
11 variances, production costs, heat rates, and discussions with the National Rural Utilities
12 Cooperative Finance Corporation (“CFC”) for financing.

13 28. The Confidential Information contained in the response and the attachments for
14 the response to AG 2-8(a)(i), (c)(ii) and (iii), (d)(i) and (iv), and (e)(i) includes information about
15 off-system sales, and documents the public production of which would reveal the contents of
16 minutes of the Big Rivers Board of Directors that were previously submitted under a petition for
17 confidential protection.

18 29. The Confidential Information contained in the attachments for the response to AG
19 2-10 includes projected capital expenditures.

20 30. The Confidential Information contained in the attachments for the response to AG
21 2-13(a), (c), and (d) includes documents detailing Big Rivers’ O&M expenses, budget and sales
22 variances, production costs, heat rates, and discussions with CFC for financing, and documents
23 that have previously been submitted under a petition for confidential protection.

1 31. The Confidential Information contained in the response to AG 2-24 includes
2 projected fixed and variable production costs.

3 32. The Confidential Information contained in the response to AG 2-30 includes
4 information regarding Big Rivers' projected fixed production costs.

5 33. The Confidential Information contained in the response to AG 2-33 includes
6 information about negotiations for off-system sales of excess capacity and reveals the content of
7 material previously submitted under a petition for confidential protection.

8 34. The Confidential Information contained in the response to AG 2-44 includes
9 information about Big Rivers' budget forecast and reveals the content of material previously
10 submitted under a petition for confidential protection.

11 35. The Confidential Information contained in the response to AG 2-45 includes
12 information about Big Rivers' budget forecast and reveals the content of material previously
13 submitted under a petition for confidential protection.

14 36. The Confidential Information contained in the response to AG 2-46 includes
15 information related to confidential ongoing negotiations between Big Rivers and Century, and
16 quotations from minutes of meetings of the Big Rivers Board of Directors.

17 37. The Confidential Information contained in the attachment for the response to AG
18 2-47 includes minutes of meetings of the Big Rivers Board of Directors.

19 38. The Confidential Information contained in the response to AG 2-48 includes
20 details regarding negotiations between Big Rivers, Century Aluminum and Alcan.

21 39. The Confidential Information contained in the response and the attachments for
22 the response to AG 2-50(d), (e) and (f) includes documents the public production of which would
23 reveal information which has previously been granted confidential protection.

1 40. The Confidential Information contained in the attachments for the response to AG
2 2-53(e) includes information about Big Rivers' off-system sales of excess capacity.

3 41. The Confidential Information contained in the attachment for the response to AG
4 2-56(f) includes minutes from a meeting of the Big Rivers Board of Directors.

5 42. The Confidential Information contained in the attachments for the response to AG
6 2-57(f) and (n) includes Big Rivers' heat rates and minutes from a meeting of the Big Rivers
7 Board of Directors.

8 43. The Confidential Information contained in the response to AG 2-63 includes
9 information about Big Rivers' projected capacity and reveals the content of material previously
10 submitted under a petition for confidential protection.

11 44. The Confidential Information contained in the attachment for the response to PSC
12 3-1 includes projected O&M costs.

13 45. The Confidential Information contained in the response to PSC 3-2 includes the
14 amount Big Rivers realizes from off-system sales of excess capacity.

15 46. The Confidential Information contained in the response to PSC 3-4 includes
16 details about Big Rivers' negotiations for the sale of excess capacity and off-system sales of
17 excess capacity.

18 47. The Confidential Information contained in the response to PSC 3-5 includes
19 information about negotiations for off-system sales.

20 48. The Confidential Information contained in the attachments for the response to
21 PSC 3-9 includes communications relating to terms of a loan Big Rivers is actively negotiating
22 with CFC, as well as information about the Load Concentration Analysis & Mitigation Plan, off-
23 system sales of excess capacity, and negotiations for the sale of excess capacity.

1 49. The Confidential Information contained in the response to PSC 3-10 includes
2 forecast variable operating costs.

3 50. The Confidential Information contained in the response to PSC 3-15 includes
4 amounts budgeted for future capital production construction projects.

5 51. The Confidential Information contained in the attachment for the response to PSC
6 3-16 includes forecast fixed production costs.

7 52. Information about a company’s detailed inner workings is generally recognized as
8 confidential or proprietary. *See, e.g., Hoy v. Kentucky Indus. Revitalization Authority,*
9 907 S.W.2d 766, 768 (Ky. 1995) (“It does not take a degree in finance to recognize that such
10 information concerning the inner workings of a corporation is ‘generally recognized as
11 confidential or proprietary’”); *Marina Management Servs. v. Cabinet for Tourism, Dep’t of*
12 *Parks,* 906 S.W.2d 318, 319 (Ky. 1995) (unfair commercial advantage arises simply from “the
13 ability to ascertain the economic status of the entities without the hurdles systemically associated
14 with the acquisition of such information about privately owned organizations”).

15 53. Additionally, the Commission has consistently recognized that board minutes,
16 internal strategic planning information, and related materials are entitled to confidential
17 treatment, as these documents typically relate to the company’s economic status and business
18 strategies. *See, e.g., In the Matter of: The Joint Application of Duke Energy Corp., Cinergy*
19 *Corp., Duke Energy Ohio, Inc., Duke Energy Kentucky, Inc., Diamond Acquisition Corp., and*
20 *Progress Energy, Inc., for Approval of the Indirect Transfer of Control of Duke Energy*
21 *Kentucky, Inc.,* P.S.C Case No. 2011-00124 (Dec. 5, 2011); *In the Matter of: The Joint Petition*
22 *of Kentucky-American Water Co., Thames Water Aqua Holdings GmbH, RWE*
23 *Aktiengesellschaft, Thames Water Aqua U.S. Holdings, Inc., and Am. Water Works Co., Inc. for*

1 *Approval of a Change in Control of Kentucky-American Water Co.*, P.S.C. Case No. 2006-00197
2 (Aug. 29, 2006) (holding that reports from the joint applicants' financial advisors and all board
3 of directors minutes and information is confidential because competitors could use it to gain
4 unfair competitive advantage).

5 54. In P.S.C. Case No. 2003-00054, the Commission granted confidential protection
6 to bids submitted to Union Light, Heat & Power ("ULH&P"). ULH&P argued, and the
7 Commission implicitly accepted, that if the bids it received were publicly disclosed, contractors
8 on future work could use the bids as a benchmark, which would likely lead to the submission of
9 higher bids. Order in *In the Matter of: Application of the Union Light, Heat and Power*
10 *Company for Confidential Treatment*, P.S.C. Case No. 2003-00054 (Aug. 4, 2012). The
11 Commission also implicitly accepted ULH&P's further argument that the higher bids would
12 lessen ULH&P's ability to compete with other gas suppliers. *Id.*

13 55. This approach has been echoed in additional cases in which the Commission has
14 previously granted confidential treatment to similar information. *See, e.g.*, letters from the
15 Commission dated July 28, 2011, and December 20, 2011, in *In the Matter of: Application of Big*
16 *Rivers Electric Corporation for a General Adjustment in Rates*, P.S.C. Case No. 2011-00036
17 (granting confidential treatment to multi-year forecast); *Application of Big Rivers Electric*
18 *Corporation for Approval of Its Environmental Compliance Plan*, P.S.C. Case No. 2012-00063
19 (granting confidential treatment to the mitigation plan in the ECP Case); letter from the
20 Commission dated December 21, 2010, in *In the Matter of: The 2010 Integrated Resource Plan*
21 *of Big Rivers Electric Corporation*, P.S.C. Case No. 2010-00443 (granting confidential treatment
22 to fuel cost projections, revenue projections, market price projections, financial model outputs,
23 etc.); letter from the Commission dated July 20, 2010, in Administrative Case No. 387 (granting

1 confidential treatment to a list of future scheduled outages, which can give competitors insight
2 into Big Rivers' wholesale power needs); two letters from the Commission dated December 11,
3 2012, in *In the Matter of: Application of Big Rivers Electric Corporation for Approval of its*
4 *2012 Environmental Compliance Plan, for Approval of its Amended Environmental Cost*
5 *Recovery Surcharge Tariff, for Certificates of Public Convenience and Necessity, and for*
6 *Authority to Establish a Regulatory Account*, P.S.C. Case No. 2012-00063 (granting confidential
7 treatment to Big Rivers' O&M expenses, and off-system sales and revenues).

8 56. Accordingly, the information for which Big Rivers seeks confidential treatment is
9 recognized as confidential or proprietary under Kentucky law and is entitled to confidential
10 protection as further discussed below.

11 **C. Disclosure of the Confidential Information Would Permit an Unfair**
12 **Commercial Advantage to Big Rivers' Competitors.**
13

14 57. Disclosure of the Confidential Information would permit an unfair commercial
15 advantage to Big Rivers' competitors. As discussed above, Big Rivers faces actual competition
16 in the wholesale power market and in the credit market. It is likely that Big Rivers would suffer
17 competitive injury if that Confidential Information was publicly disclosed, and the information
18 should therefore be subject to confidential treatment.

19 58. Public disclosure of the Confidential Information would reveal detailed
20 information relating to Big Rivers' recent and projected cost of producing power (including
21 projected fuel, emissions permit, and other O&M costs); recent and projected off-system sales
22 volumes and prices; recent purchased power volumes and prices; and Big Rivers' future need for
23 power or availability of excess power to sell into the market. Access to this information would
24 grant competitors and suppliers an unfair competitive advantage, allowing them to adjust their
25 prices in response to the prices at which Big Rivers is willing to buy or sell power, production

1 inputs, and other commodities the prices at which Big Rivers is willing to buy or sell power,
2 production inputs and similar commodities.

3 59. Public disclosure of the information about planned outages would help Big
4 Rivers' suppliers, buyers, and competitors to determine when Big Rivers will have power
5 available to sell into the market or when Big Rivers needs power, and the amount of power Big
6 Rivers has to sell. Big Rivers' suppliers, buyers, and competitors will thus have an insight into
7 the prices Big Rivers needs to or would be willing to pay for capacity, thus granting them an
8 unfair competitive advantage.

9 60. Public disclosure of the Confidential Information regarding pending negotiations
10 with the CFC will impair Big Rivers' ability to negotiate with CoBank and other potential
11 lenders, leading to less favorable terms and higher prices to Big Rivers.

12 61. Some Confidential Information includes material such as Big Rivers' projections
13 of fuel costs and power prices. If that information is publicly disclosed, market participants
14 would have insight into the prices at which Big Rivers is willing to buy and sell fuel and power
15 and could manipulate the bidding process, leading to higher prices or lower revenues for Big
16 Rivers and impairing its ability to compete in the wholesale power and credit markets.

17 62. Potential market power purchasers could use the information related to Big
18 Rivers' projected off-system sales and revenues, generation levels, generator availability,
19 planned outages, and future planning to know when Big Rivers is long on power and could use
20 that information to manipulate their bids, leading to lower revenues to Big Rivers and placing it
21 at an unfair competitive disadvantage in the credit markets.

22 63. Additionally, public disclosure of the fuel prices, other variable cost information,
23 and information about Big Rivers' wholesale power needs would give the power producers and

1 marketers with which Big Rivers competes in the wholesale power market insight into Big
2 Rivers' cost of producing power and need for power and energy during the periods covered by
3 the information. Knowledge of this information would give those power producers and
4 marketers an unfair competitive advantage because they could use that information to potentially
5 underbid Big Rivers in wholesale transactions. It would also give potential suppliers to Big
6 Rivers a competitive advantage because they will be able to manipulate the price of power bid to
7 Big Rivers in order to maximize their revenues, thereby driving up Big Rivers' costs and
8 impairing Big Rivers' ability to compete in the wholesale power and credit markets.

9 64. In light of the above, the Confidential Information claimed by Big Rivers should
10 be granted confidential protection.

11 **III. Time Period**

12 65. Big Rivers requests that the Confidential Information protected by KRS
13 61.878(1)(m) remain confidential indefinitely because as long as the transmission remains in
14 place, the information should be confidential for the reasons stated above. Big Rivers also
15 requests that the rest of the Confidential Information remain confidential for a period of five (5)
16 years from the date of this petition, which should allow sufficient time for the projected data to
17 become historical and sufficiently outdated that it could not be used to determine similar
18 confidential information at that time. 807 KAR 5:001 Section 13(2)(a)(2).

19 **IV. Conclusion**

20 66. Based on the foregoing, the Confidential Information is entitled to confidential
21 protection. If the Commission disagrees that Big Rivers is entitled to confidential protection, due
22 process requires the Commission to hold an evidentiary hearing. *Utility Regulatory Comm'n v.*
23 *Kentucky Water Serv. Co., Inc.*, 642 S.W.2d 591 (Ky. App. 1982).

1 WHEREFORE, Big Rivers respectfully requests that the Commission classify and protect
2 as confidential the Confidential Information.

3 On this the 28th day of March, 2013.

4 Respectfully submitted,

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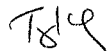
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Certificate of Service

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 March, 2013,



Tyson Kamuf

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