

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF OWEN ELECTRIC)
COOPERATIVE, INC. FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY FOR) CASE NO. 2015-00213
THE CONSTRUCTION OF A TWO MEGAWATT)
DISTRIBUTED GENERATION FACILITY IN)
OWEN COUNTY, KENTUCKY)

MOTION FOR CONFIDENTIAL TREATMENT

Comes now Owen Electric Cooperative, Inc. ("Owen Electric"), by and through counsel, pursuant to KRS 61.878, 807 KAR 5:001, Section 13 and other applicable law, and for its Motion requesting that the Kentucky Public Service Commission ("Commission") afford confidential treatment to certain responses to one request for information in the above-captioned proceeding, respectfully states as follows:

1. On June 26, 2015, Owen Electric filed its Application for a Certificate of Public Convenience and Necessity ("CPCN") for the Construction of a Two Megawatt Distributed Generation Facility in Owen County, Kentucky ("Application.")
2. As stated in the Application, the energy sourced from this distributed generation facility will displace two megawatts of energy purchased from Owen Electric's power supplier, East Kentucky Power Cooperative, Inc. ("EKPC") The displacement of this purchase will save Owen Electric approximately \$9.4 million over the next twenty years.
3. The Commission issued its Initial Request for Information in this proceeding on July 30, 2015.
4. Request No. 11 states as follows:
 11. Refer to Exhibit MAS-1. For each of the 20 years shown, provide all information and calculations supporting the amounts shown for EKPC Savings and Annual Operating Costs. The information provided should be in sufficient detail to show all assumptions and source materials with regard

to expected commodity gas cost, Texas Gas Transmission ("TGT") pipeline transportation charges, and future rates from Carrollton Utilities.

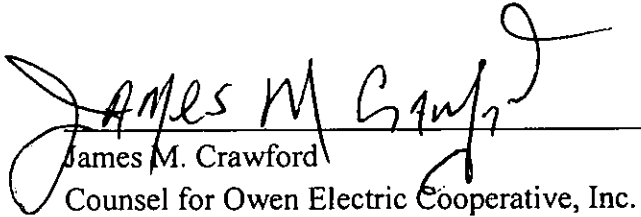
5. In its response to Request No. 11, Owen Electric is providing portions of the EKPC financial forecast, which includes information that is responsive to the request for information. Use of EKPC's 2015 financial forecast was necessary to establish the basis for the cost savings associated with constructing the distributed generation unit. EKPC's financial forecast is hereinafter referred to as the "Confidential Information."
6. The Kentucky Open Records Act exempts from disclosure certain confidential and proprietary commercial information. See KRS 61.878(1)(c). To qualify for this exemption from public disclosure and, therefore, to maintain the confidentiality of the information, a party must establish that disclosure of the confidential and proprietary commercial information would permit an unfair advantage to competitors of that party. Public disclosure of the Confidential Information described above would lead to such a result.
7. The Confidential Information was developed internally by EKPC personnel and was provided to Owen Electric on a confidential basis for this proceeding. The Confidential Information is not on file with any public agency, and is not available from any commercial or other source. The Confidential Information is distributed within EKPC and Owen Electric only to those employees who must have access for business reasons, and is generally recognized as confidential and proprietary in the energy industry.
8. The Commission granted confidential treatment for EKPC's financial forecast in Case No. 2014-00292, recognizing that EKPC was a party to that proceeding.
9. In accordance with 807 KAR 5:001, Section 13(3), Owen Electric is filing one copy of the response to Request No. 11 with the Confidential Information, under seal, which identifies the Confidential Information, and an original and ten copies of the response to Request No. 11 with the Confidential Information redacted.
10. In accordance with 807 KAR 5:001, Section 13(2), Owen Electric respectfully requests that the Confidential Information be treated as confidential under the Commission's regulations for a period of ten years.

WHEREFORE, on the basis of the foregoing, Owen Electric respectfully requests the Commission to enter an Order granting this Motion and to so afford such protection from public

disclosure to the unredacted copies of the Confidential Information, which are filed herewith under seal, for a period of ten years.

This 10 day of August 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James M. Crawford", is written over a horizontal line.

James M. Crawford
Counsel for Owen Electric Cooperative, Inc.
Crawford & Baxter, P.S.C.
P.O. Box 353
Carrollton, Kentucky 41008
Phone: (502) 732-6688
Fax: (502) 732-8303
CBI523@aol.com