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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SALT RIVER ELECTRIC)
COOPERATIVE CORPORATION FOR AN)
ORDER ISSUING A CERTIFICATE OF PUBLIC) CASE No.
CONVENIENCE AND NECESSITY TO) 2019-00399
CONSTRUCT AN ADVANCED METERING)
INFRASTRUCTURE SYSTEM (AMI) PURSUANT)
TO 807 KAR 5:001 AND KRS 278.020)

**ATTORNEY GENERAL'S MOTION TO COMPEL PRODUCTION OF
CONFIDENTIAL MATERIALS**

Comes now the Attorney General of the Commonwealth of Kentucky ("OAG"), by and through his Office of Rate Intervention, and hereby moves the Commission to issue an order compelling petitioner, Salt River Electric Cooperative ("Salt River," or "the Company") to produce copies of the confidential materials it provided in response to supplemental data requests of both the Commission Staff and of the OAG.

In support of this motion, counsel states that on January 10, 2020 the Commission Staff filed its supplemental data requests to Salt River, and on January 15, 2020 OAG filed its supplemental data requests. On January 28, 2020 Salt River filed responses to both sets of data requests. Salt River's responses to both sets of data requests contained certain confidential information. The OAG has entered into a confidentiality agreement with Salt River, as Salt River acknowledged in a docket filing dated December 30, 2019. Despite having requested in an email to Salt River's counsel of record that the company provide this information, to date, Salt River has failed to provide the requested information.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion.

Respectfully submitted,
DANIEL CAMERON
ATTORNEY GENERAL



LAWRENCE W. COOK
JUSTIN M. McNEIL
ASSISTANT ATTORNEYS GENERAL
700 CAPITOL AVE., STE. 20
FRANKFORT KY 40601-8204
(502) 696-5453
Justin.McNeil@ky.gov
Larry.Cook@ky.gov

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Mr. Kent A. Chandler, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Tim J. Sharp
Salt River Electric Cooperative Corp.
111 West Brashear Ave.
P. O. Box 609
Bardstown, KY 40004

John Douglas Hubbard
Jason P. Floyd
Hubbard & Hubbard
117 E. Stephen Foster Ave.
Bardstown, KY 40004

This 7th day of February, 2020.



Assistant Attorney General