## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

To the Matter of Adicate and a Change	C N- 2012 00210
In the Matter of Adjustment of Rates )	Case No. 2013-00219
of Jackson Energy Cooperative )	
)	

## MOTION FOR CONFIDENTIALITY

Jackson Energy Cooperative Corporation ("Jackson Energy"), by counsel, pursuant to 807 KAR 5:001, Section 13 and KRS 61.878, moves the Public Service Commission of Kentucky ("the Commission") for an order granting confidential treatment to portions of its response dated August 29, 2013 to the Commission's first data request. As grounds for this motion, Jackson Energy states as follows:

- By letter dated June 10, 2013, Jackson Energy gave notice to the Commission of its intent to file an application for an increase in its retail rates.
- By letter dated June 11, 2013, the Commission acknowledged receipt of Jackson Energy's notice of intent to file an application for an increase in rates, and on July 2, 2013, the Commission filed its first data request in this case.
- Request number 19 of the Commission's first data request sought a schedule of purchased power costs for the test year of 2012, and for the previous year, 2011, separated by vendor.
- 4. Jackson Energy, along with 15 other distribution cooperatives in the State of Kentucky, is an owner of East Kentucky Power Cooperative ("East Kentucky"), and as such, obtains the vast majority of its power requirements from East Kentucky.
- Pursuant to the wholesale power contract with East Kentucky, as amended,
   Jackson Energy is entitled to purchase power from sources other than East Kentucky, provided

that such purchases do not exceed certain percentages of its total load as set forth in amendments to the wholesale power contract.

- 6. In 2011, Jackson Energy entered into a contract for the purchase of power with Wellhead Energy Systems, Inc. ("Wellhead"), which is a privately owned company that sells power to electric utilities that is generated by natural gas from individual stranded gas wells or gas pipelines.
- Contemporaneously with entering into that contract, Jackson Energy notified the
   Commission of its intent to purchase power from Wellhead.
- 8. Pursuant to its contract for the purchase of power with Wellhead, Jackson Energy agreed to treat as confidential the rates it pays to Wellhead for energy purchased from Wellhead. This confidentiality provision was insisted upon by Wellhead due to its status as a private corporation that sought the execution of purchase power contracts from other utilities at competitive rates. Wellhead believed that disclosure of the rates for power paid by Jackson Energy pursuant to its contract would impair its ability to negotiate with other utilities and would permit an unfair commercial advantage to the competitors of Wellhead.
- 9. Accordingly, pursuant to KRS 61.878(c)(1), the amount and the cost of power Jackson Energy has purchased from Wellhead is proprietary information, and the public disclosure of this information would violate a confidentiality agreement between Jackson Energy and Wellhead and would result in an unfair commercial advantage to competitors. The type of information sought would generally be considered proprietary and there is no significant public interest in favor of the disclosure of this information.
- 10. Jackson Energy, pursuant to 807 KAR 5:001, Section 13, submits, under seal, the complete information requested by the Commission and for which confidentiality is sought, with

said information being contained on one page and being circled in red. This information specifically includes the total kilowatts of electricity, the kilowatt hours and the dollar amount paid by Jackson Energy to Wellhead for the years 2011 and 2012.

11. Jackson Energy requests that this information be deemed confidential indefinitely, because the contract with Wellhead is ongoing, as is Jackson Energy's requirement to treat the information as such.

For the above stated reasons, Jackson Energy Cooperative Corporation hereby moves the Kentucky Public Service Commission for an order treating as confidential all information identified in this motion.

Submitted this 29th day of August 2013.

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## CONFIDENTIAL

JACKSON ENERGY COOPERATIVE POWER BILL COMPARISON

Item 19 Page 1 of 1 Witness: Jim Adkins

2012	KW	KWH	KW\$	KWH \$	METER	Substation CHARGE		Environmental Surcharge	TOTAL	Total	Cost Without Fuel & ES Per KWH	(Included in Totals) Green Power			(Included in Totals) Wellhead		
							FUEL			Cost/KWH		KWH	\$	KW		CWH	\$
ANUARY	209,826	99,623,991	\$1,272,466	\$4,800,897.00	\$4,176	\$105,911	\$68,587	\$886,397	\$7,138,434.00	\$0.07165	\$0.06207	16,000	\$380				
EBRUARY	221,760	86,615,939	\$1,343,303	\$4,172,343.00	\$4,176	\$105,911	(\$49,230)	\$672,305	\$6,248,808.00	\$0.07214	\$0.06495	16,000	\$380				
MARCH	180,516	66,026,444	\$1,094,767	\$3,176,678.00	\$4,176	\$105,911	(\$106,578)	\$459,197	\$4,734,151.00	\$0.07170	\$0.06636	16,000	\$380				
APRIL	143,366	60,700,005	\$872,748	\$2,919,698.00	\$4,176	\$105,911	(\$246,186)	\$470,639	\$4,126,986.00	\$0.06799	\$0.06429	16,000	\$380				
MAY	159,339	66,166,225	\$968,004	\$3,262,198.00	\$4,176	\$105,911	(\$221,224)	\$614,116	\$4,733,181.00	\$0.07153	\$0.06560	16,000	\$380				
UNE	182,422	71,192,143	\$1,109,779	\$3,521,745.60	\$4,176	\$105,911	(\$219,881)	\$763,748	\$5,285,478.60	\$0.07424	\$0.06660	16,000	\$380				
ULY	183,916	85,192,060	\$1,119,633	\$4,215,304.00	\$4,176	\$105,911	(\$260,682)	\$806,106	\$5,990,448.00	\$0.07032	\$0.06391	16,000	\$380				
NUGUST	170,325	75,658,726	\$1,036,091	\$3,741,555.20	\$4,176	\$105,911	(\$220,512)	\$675,830	\$5,343,051.20	\$0.07062	\$0.06460	16,000	\$380				
SEPTEMBER	150,760	61,970,582	\$917,518	\$3,047,402.80		190 Calaba (190 Ca	A CONTRACTOR OF THE PARTY OF TH	\$568,164	\$4,606,141.80	\$0.07433	\$0.06576	14,700	\$349				
CTOBER	154,581	65,956,143	\$938,926	\$3,175,038.60	\$4,176 \$4,176	\$105,911 \$105,911	(\$37,030) (\$28,244)	\$678,064	\$4,873,871.60	\$0.07433	\$0.06404	14,600	\$349				
IOVEMBER	193,253	83,088,672	\$1,170,792	\$4,004,628.20	\$4,176	\$105,911	\$140.805	\$950,331	\$6,376,643.20	\$0.07675	\$0.06361	14,600	\$347				
DECEMBER	194,160	90,640,170	\$1,175,992	\$4,373,318.80	\$4,176	\$105,911	\$226,780	\$1,069,573	\$6,955,750.80	\$0.07674	\$0.06244	14,600	\$347				
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DECEMBER	10.17.00																
OTAL		912,831,100	\$13,020,019	\$44,410,807.20	\$50,112	\$1,270,932	(\$953,395)	\$8,614,470	\$66,412,945.20	\$0.07275	\$0.06436	186,500	\$4,430		0	0	\$0
OTAL		912,831,100 KWH	\$13,020,019 KW\$	\$44,410,807.20 KWH \$	\$50,112 METER POINT	\$1,270,932 Substation CHARGE	(\$953,395)	\$8,614,470  Environmental Surcharge	\$66,412,945.20 TOTAL COST		\$0.06436 Cost Without Fuel & ES Per KWH	(Included in Green F	Totals)	KW	(Includ	0 ded in Totals) ilhead KWH	\$0
OTAL 011	2,144,224 KW	KWH	KW \$	KWH \$	METER POINT	Substation CHARGE	FUEL	Environmental Surcharge	TOTAL COST	Total Cost/KWH	Cost Without Fuel & ES Per KWH	(Included in Green F KWH	Totals) Power \$	KW	(Includ	ded in Totals)	
OTAL 011 ANUARY	2,144,224 KW 270,272	KWH 121,505,859	KW \$ \$1,603,215	KWH \$ \$6,487,067.00	METER POINT \$4,089	Substation CHARGE \$103,659	FUEL (\$642,765)	Environmental Surcharge \$1,111,317	TOTAL COST \$8,666,582.00	Total	Cost Without Fuel & ES	(Included in Green F	Totals)	KW	(Includ	ded in Totals)	
OTAL  011  ANUARY EBRUARY	2,144,224 KW	KWH	KW \$	KWH \$	METER POINT	Substation CHARGE	FUEL	Environmental Surcharge	TOTAL COST	Total Cost/KWH \$0.07133	Cost Without Fuel & ES Per KWH \$0.06747	(Included in Green F KWH 17,400	Totals) Power \$	KW	(Includ	ded in Totals)	
OTAL  OTAL	2,144,224 KW 270,272 262,871 175,023 159,000	KWH 121,505,859 90,404,654 82,365,706 63,040,179	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911	FUEL (\$642,765) (\$645,488) (\$786,682) (\$552,835)	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$5,182,407.00 \$4,390,323.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06964	Cost Without Fuel & ES Per KWH \$0.06747 \$0.07337 \$0.06866 \$0.07119	(Included in Green F KWH 17,400 16,900 16,700	Totals) Power \$ \$413 \$401 \$401 \$397	KW	(Includ	ded in Totals)	
OTAL  OTAL	2,144,224 KW 270,272 262,871 175,023 159,000 161,293	KWH 121,505,859 90,404,654 82,365,706 63,040,179 66,172,031	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296 \$982,669	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00 \$3,670,904.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911 \$105,911	FUEL (\$842,765) (\$645,488) (\$786,882) (\$552,835) (\$772,185)	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351 \$501,250	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$5,182,407.00 \$4,399,323.00 \$4,492,725.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06964 \$0.06789	Cost Without Fuel & ES Per KWH \$0.06747 \$0.07337 \$0.06866 \$0.07119 \$0.07199	(Included in Green F KWH 17,400 16,900 16,700 16,300	Totals) Power \$ \$413 \$401 \$401 \$397 \$387	ĸw	(Includ	ded in Totals)	
OTAL  OTAL  ANUARY EBRUARY MARCH PRIL MAY UNE	2,144,224 KW 270,272 262,871 175,023 159,000 161,293 168,485	KWH 121,505,859 90,404,654 82,365,706 63,040,179 66,172,031 72,609,989	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296 \$982,669 \$1,023,968	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00 \$3,670,904.00 \$3,591,149.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911 \$105,911 \$105,911	FUEL (\$642,765) (\$645,488) (\$786,882) (\$552,835) (\$772,185) (\$22,453)	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351 \$501,250 \$673,151	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$5,182,407.00 \$4,390,323.00 \$4,492,725.00 \$5,375,902.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06789 \$0.07404	Cost Without Fuel & ES Per KWH \$0.06747 \$0.07337 \$0.06866 \$0.07119 \$0.07199 \$0.06508	(Included in Green F KWH 17,400 16,900 16,900 16,700 16,300 16,300	Totals) Power \$ \$413 \$401 \$401 \$397 \$387	KW	(Includ	ded in Totals)	
OTAL  OTAL  ANUARY EBRUARY IARCH PRIL IAY UNE	2,144,224 KW 270,272 262,871 175,023 159,000 161,293 168,485 180,792	KWH 121,505,859 90,404,654 82,365,706 63,040,179 66,172,031 72,609,989 86,613,050	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296 \$92,669 \$1,023,968 \$1,099,915	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00 \$3,670,904.00 \$3,591,149.00 \$4,289,347.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911	FUEL (\$842,765) (\$645,488) (\$786,682) (\$552,835) (\$772,185) (\$22,453) (\$117,483)	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351 \$501,250 \$673,151 \$750,859	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$5,182,407.00 \$4,399,323.00 \$4,492,725.00 \$5,375,902.00 \$6,132,725.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06789 \$0.077404 \$0.07081	Cost Without Fuel & ES Per KWH \$0.06747 \$0.07337 \$0.06866 \$0.07119 \$0.07199 \$0.06508 \$0.06349	(Included in Green F KWH 17,400 16,900 16,700 16,300 16,300 16,000	Totals) Power \$ \$413 \$401 \$401 \$397 \$387 \$387 \$388	KW	(Includ	ded in Totals)	
OTAL  OTAL  ANUARY EBRUARY IARCH PRIL IAY UNE ULY UUSUUT	2,144,224 KW 270,272 262,871 175,023 159,000 161,293 168,485 180,792 174,320	KWH 121,505,859 90,404,654 82,365,706 63,040,179 66,172,031 72,609,989 86,613,050 81,116,965	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296 \$982,669 \$1,023,968 \$1,099,915 \$1,060,227	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00 \$3,670,904.00 \$3,591,149.00 \$4,289,347.00 \$4,015,846.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911	FUEL (\$642,765) (\$645,488) (\$786,682) (\$552,835) (\$772,185) (\$22,453) (\$117,483) \$29,945	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351 \$501,250 \$673,151 \$750,859 \$684,377	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$1,182,407.00 \$4,390,323.00 \$4,492,725.00 \$5,375,902.00 \$6,132,725.00 \$5,900,482.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06964 \$0.07898 \$0.07404 \$0.07081 \$0.07274	Cost Without Fuel & ES Per KWH \$0.06747 \$0.06866 \$0.07119 \$0.07199 \$0.06508 \$0.06349 \$0.06393	(Included in Green F KWH 17,400 16,900 16,700 16,300 16,300 16,000 16,000	Totals) Power \$ \$413 \$401 \$491 \$397 \$387 \$387 \$388 \$380	KW	(Includ	ded in Totals)	
OTAL  OTAL  ANUARY EBRUARY AARCH APRIL AAY UNE ULY UUSUST EEPTEMBER	2,144,224 KW 270,272 262,871 175,023 159,000 161,293 168,485 180,792 174,320 168,423	KWH 121,505,859 90,404,654 82,365,706 63,040,179 66,172,031 72,609,989 86,613,050 81,116,955 61,227,697	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296 \$982,669 \$1,023,968 \$1,099,915 \$1,060,227 \$1,023,164	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00 \$3,670,904.00 \$3,591,149.00 \$4,289,347.00 \$4,015,846.00 \$3,007,453.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911	FUEL (\$642,765) (\$645,488) (\$786,682) (\$552,835) (\$772,185) (\$22,453) (\$117,483) \$29,945 (\$21,957)	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351 \$501,250 \$673,151 \$750,859 \$684,377 \$462,873	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$4,390,323.00 \$4,492,725.00 \$5,375,902.00 \$6,132,725.00 \$4,581,620.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06964 \$0.0789 \$0.07404 \$0.070274 \$0.07274	Cost Without Fuel & ES Per KWH \$0.06747 \$0.07337 \$0.06866 \$0.07119 \$0.07199 \$0.06508 \$0.06349 \$0.06393 \$0.06763	(Included in Green F KWH 17,400 16,900 16,700 16,300 16,300 16,000 16,000	Totals) Power \$ \$413 \$401 \$491 \$491 \$397 \$387 \$387 \$380 \$380 \$380	ĸw	(Includ	ded in Totals)	
OTAL  OTAL  ANUARY EBRUARY MARCH PRIL MAY UNE ULY UNGUST EPTEMBER COTOBER	2,144,224 KW 270,272 262,871 175,023 159,000 161,293 168,485 180,792 174,320 168,423 155,824	KWH 121,505,859 90,404,654 82,365,706 63,040,179 66,172,031 72,609,989 86,613,050 81,116,955 61,227,697 66,135,134	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296 \$1,023,968 \$1,099,915 \$1,060,227 \$1,023,164 \$945,555	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00 \$3,670,904.00 \$3,591,149.00 \$4,289,347.00 \$4,015,846.00 \$3,007,453.00 \$3,183,179.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911	FUEL (\$642,765) (\$645,488) (\$796,682) (\$552,835) (\$772,185) (\$22,453) (\$117,483) \$29,945 (\$21,957) (\$3,950)	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351 \$501,250 \$673,151 \$750,859 \$684,377 \$462,873 \$506,585	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$5,182.407.00 \$4,390,323.00 \$4,492,725.00 \$5,375,902.00 \$6,132,725.00 \$5,900,482.00 \$4,581,620.00 \$4,741,456.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06789 \$0.07404 \$0.07081 \$0.07274 \$0.07274 \$0.07483 \$0.07169	Cost Without Fuel & ES Per KWH \$0.06747 \$0.07337 \$0.06866 \$0.07119 \$0.06508 \$0.06393 \$0.06763 \$0.06763	(Included in Green F KWH 17,400 16,900 16,700 16,300 16,300 16,000 16,000 16,000	Totals) Power \$ \$413 \$401 \$401 \$397 \$387 \$380 \$380 \$380 \$380 \$380	KW	(Includ	ded in Totals)	
OTAL  OTAL  OTAL  ANUARY EBRUARY IARCH PRIL IAY UNE ULY UNE ULY UGUST EPTEMBER	2,144,224 KW 270,272 262,871 175,023 159,000 161,293 168,485 180,792 174,320 168,423	KWH 121,505,859 90,404,654 82,365,706 63,040,179 66,172,031 72,609,989 86,613,050 81,116,955 61,227,697	KW \$ \$1,603,215 \$1,594,424 \$1,066,779 \$970,296 \$982,669 \$1,023,968 \$1,099,915 \$1,060,227 \$1,023,164	KWH \$ \$6,487,067.00 \$4,928,745.00 \$4,478,232.00 \$3,407,424.00 \$3,670,904.00 \$3,591,149.00 \$4,289,347.00 \$4,015,846.00 \$3,007,453.00	METER POINT \$4,089 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176 \$4,176	Substation CHARGE \$103,659 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911 \$105,911	FUEL (\$642,765) (\$645,488) (\$786,682) (\$552,835) (\$772,185) (\$22,453) (\$117,483) \$29,945 (\$21,957)	Environmental Surcharge \$1,111,317 \$387,380 \$313,991 \$455,351 \$501,250 \$673,151 \$750,859 \$684,377 \$462,873	TOTAL COST \$8,666,582.00 \$6,375,148.00 \$4,390,323.00 \$4,492,725.00 \$5,375,902.00 \$6,132,725.00 \$4,581,620.00	Total Cost/KWH \$0.07133 \$0.07052 \$0.06292 \$0.06964 \$0.0789 \$0.07404 \$0.070274 \$0.07274	Cost Without Fuel & ES Per KWH \$0.06747 \$0.07337 \$0.06866 \$0.07119 \$0.07199 \$0.06508 \$0.06349 \$0.06393 \$0.06763	(Included in Green F KWH 17,400 16,900 16,700 16,300 16,300 16,000 16,000	Totals) Power \$ \$413 \$401 \$491 \$491 \$397 \$387 \$387 \$380 \$380 \$380	KW	(Includ	ded in Totals)	