

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTONIC APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR AN ADJUSTMENT ELECTRIC) CASE NO. 2016-00370
OF ITS RATES AND FOR CERTIFICATES OF)
PUBLIC CONVIENCE AND NECESSITY)

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT’S
PETITION FOR CONFIDENTIAL PROTECTION**

Lexington-Fayette Urban County Government (“LFUCG”), by counsel, hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 13 and KRS 61.878(1) to grant confidential protection for the documents attached as Exhibit DJ-8 to the testimony of Douglas Jester. In support of this Petition, LFUCG states as follows:

1. On February 20, 2017, Kentucky Utilities responded to LFUCG’s Second Request for Information. In response to Item 52 of that request, Kentucky Utilities attached documents revealing preliminary brands and models of LED lights that the Company is considering to utilize within its Lighting Service offerings.

2. In conjunction with its response, Kentucky Utilities filed a Petition for Confidential Protection on February 20, 2017, in which it asserted the reasoning for confidential treatment of the aforementioned attachments as follows:

LFUCG Item 2-52 requests information about LED lighting. In response to LFUCG Item 2-52, KU is providing documents that contain pricing information about LED lighting components. The documents provided in response to LFUCG Items 2-21(a) and 2-52 are confidential business information because they disclose bids submitted by competitive bidders. Confidential protection is necessary because disclosure of this information would disrupt the

competitive bid process and place KU and its shareholders at a competitive disadvantage for negotiating future agreements. Thus, KU requests confidential protection for the entirety of the documents provided in response to LFUCG Items 2-21(a) and 2-52.

3. The documents that are contained in Exhibit DJ-8 to the testimony of Douglas Jester are product specification sheets for the light offerings that Kentucky Utilities identified in response to LFUCG 2-52.

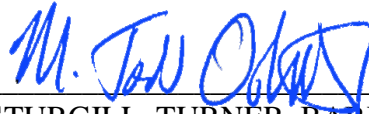
4. The documents that are contained in Exhibit DJ-8 to the testimony of Douglas Jester were obtained on publicly accessible websites.

5. LFUCG is filing this motion out of an abundance of caution and to protect any asserted interest of Kentucky Utilities. If Kentucky Utilities agrees that confidential protection of these documents is not needed or unjustified, LFUCG agrees to waive this request for confidential protection.

6. Consistent with Kentucky Utilities' request, LFUCG requests that confidential protection be granted for five years.

Wherefore, LFUCG respectfully requests confidential protection the documents attached as Exhibit DJ-8 to the testimony of Douglas Jester if the Commission deems it appropriate.

Respectfully submitted,



STURGILL, TURNER, BARKER & MOLONEY, PLLC

James W. Gardner

M. Todd Osterloh

333 W. Vine Street, Suite 1500

Lexington, Kentucky 40507

Telephone No.: (859) 255-8581

Facsimile No.: (859) 231-0851

jgardner@sturgillturner.com

tosterloh@sturgillturner.com

and

Janet Graham, Commissioner of Law
David J. Barberie, Managing Attorney
Andrea C. Brown, Attorney
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500
jgraham@lexingtonky.gov
dbarberi@lexingtonky.gov
abrown2@lexingtonky.gov

*Attorneys for Lexington-Fayette Urban County
Government*

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the March 3, 2017, electronic filing of this Petition for Confidential Treatment is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be transmitted to the Commission on March 3, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Petition for Confidential Treatment will be delivered to the Commission within two business days.



Counsel for LFUCG