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VIA ELECTRONIC FILING AND COURIER

February 14, 2019

Gwen Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Re: Response and Objections of Sierra Club, Alice Howell, and Carl Vogel to the Data Requests of Kentucky Utilities Company in Case No. 2018-294, Adjustment of Electric Rates for Kentucky Utilities Company

Dear Ms. Pinson:

Please find enclosed for filing one copy of the Response and Objections of Sierra Club, Alice Howell, and Carl Vogel (collectively “Sierra Club”) to the Data Requests of Kentucky Utilities Company (“KU”) in Case No. 2018-00294, Adjustment of Rates for KU before the Kentucky Public Service Commission. This filing is comprised by the enclosed several printed pages as well as CDs containing Excel files, as explained below, and is also being filed electronically. Sierra Club was granted intervention by the Franklin Circuit Court in *Sierra Club et al. v. Public Service Commission of Kentucky et al.*, Civil Action No. 18-CI-1129.

The electronically filed documents are a true representation of the original documents to be filed with the Commission. Sierra Club’s response to one of KU’s data requests (specifically the first of two) consists of five electronic workpapers of Sierra Club’s witness, Dr. Jeremy Fisher, the fifth of which contains confidential information, as discussed below. Sierra Club’s electronic filing provides these workpapers in PDF form, with the fifth workpaper redacted. Meanwhile, Sierra Club’s physical production to the Commission provides these same workpapers on CDs in their native Excel format: one CD, labeled public, contains only Dr. Fisher’s four non-confidential workpapers; the other CD, labeled confidential, contains all five of Dr. Fisher’s workpapers, including confidential workpaper #5. (Sierra Club is also providing KU with the native Excel files via email, per counsel’s agreement.) Accordingly, because Sierra Club provides the Commission with the original workpapers in Excel format on the CDs, Sierra Club refrains from additionally (and redundantly) providing the Commission with physical printouts of the workpapers, which would exceed 500 pages.

Sierra Club’s redaction is done for the purpose of honoring and continuing the confidential treatment afforded to the same substance by KU in discovery responses provided by KU to Sierra Club—specifically, in the discovery responses cited by Dr. Fisher in the redacted portions of his testimony. When KU provided Sierra Club with its discovery responses, the Company

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contemporaneously filed Petitions for Confidential Protection with the Commission—namely, on December 6, 2018, and on January 2, 2019. Accordingly, and consistent with the Confidentiality Agreement that Sierra Club executed with KU, Sierra Club's publicly filed response to KU's data requests includes redactions for the sole purpose of maintaining the confidentiality of the same substance KU previously designated as protected, and only to the extent necessary to do so.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe F. Childers", is written above a solid horizontal line.

JOE F. CHILDERS