## COMMONWEATLH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:	Case No. 2018-00294
APPLICATION OF KENTUCKY UTILITIES	23322 2 333 20 20 20 2
COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC	
RATES	
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IN THE MATTER OF:	
	Case No. 2018-00295
APPLICATION OF LOUISVILLE GAS & ELECTRIC	
COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC	
AND GAS RATES	

## THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES' MOTION FOR CONFIDENTIAL PROTECTION

Pursuant to 807 KAR 5:001, Section 13 and KRS 61.878(1), The United States Department of Defense and all other Federal Executive Agencies (DoD/FEA) hereby move for confidential protection for the items described herein. KRS 61.878(c)(1) provides that disclosure of generally recognized confidential or proprietary information is exempt from the Kentucky Open Records Act if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records. Included in the response to Kentucky Utilities Company's and Louisville Gas and Electric Company's First Request for Information Number 8 and 10A, and 10B; in the response to Commission Staff's Initial Request for Information for 2018-00294 Number 7, 11A, and 11B; and in the response to Commission Staff's Initial Request for Information for 2018-00295 Number 9, 13A and B are Christopher C. Walters' workpapers containing confidential and proprietary information of companies that provide industry data and research. These companies provide this information through subscription services, and it is not readily available to the public without a subscription. These companies developed the information

through extensive research, and if publicly disclosed, would work to their commercial

disadvantage. Public disclosure of this confidential information would harm DoD/FEA's ability

to obtain experts in the future by discouraging experts from fully and candidly assisting DoD/FEA

due to confidentiality concerns.

DoD/FEA will disclose the confidential information, pursuant to a confidentiality

agreement, to all parties of record with a legitimate interest in the information and as required by

the Commission. In compliance with 807 KAR 5:001, Section 8(3), Section 13(2)(e) and the

Commission's Order dated December 13, 2016, DoD/FEA is filing with the Commission one paper

copy that identifies the information for which confidential protection is sought. Due to the

sensitive nature of the information at issue, DoD/FEA requests that confidential protection be

granted for an indefinite period of time.

WHEREFORE, DoD/FEA respectfully requests that the Commission grant confidential

protection for the information described herein.

Respectfully submitted,

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