

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO THE	)	
MANAGEMENT AND OPERATION OF	)	CASE NO.
GRAYSON RURAL ELECTRIC COOPERATIVE	)	2019-00101
CORPORATION	)	

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**MOTION FOR CONFIDENTIAL TREATMENT OF CERTAIN  
INFORMATION AND DOCUMENTS PROVIDED BY GRAYSON RECC  
TO VANTAGE ENERGY CONSULTING, LLC PURSUANT TO DATA REQUESTS**

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Comes now Grayson Rural Electric Cooperative Corporation, by and through the undersigned counsel, and hereby requests that the Commission grant confidential treatment to certain information and documents requested by Vantage Energy Consulting, LLC as part of its management audit in this matter. As grounds for this motion, Grayson Rural Electric Cooperative Corporation (“Grayson”) states as follows:

The Commission has opened the within case for the purpose of conducting an operations and management audit of Grayson. After publishing a request for proposals and reviewing the responses, the Commission selected Vantage Energy Consulting, LLC (“Vantage”) to perform the audit. As part of the audit process, Vantage submitted a number of data requests to Grayson. In response to those requests, Grayson has produced thousands of pages of documents. The vast majority of those documents are being filed with the Commission in the within case with no objection. However, there are certain documents for which Grayson hereby requests confidentiality as follows:

1. A list of employees of Grayson with job descriptions and other details including current rates of pay as stated in Request 18.

2. Worker's compensation data for the past three years as stated in Request 27.
3. Amounts of capital credits owed to estates as stated in Request 38.
4. Information provided to the Board in advance of Board meetings, which includes, without limitation, Grayson's check register, and personal information of members (including names, addresses, etc.) as stated in Request 8.
5. The administrative guidelines governing the day to day internal operations of Grayson as stated in Request 95.
6. The salary ranges for the employees of Grayson as stated in Request 100.
7. Long term disability contribution rates for all employees as stated in Request 102.
8. The Cooperative Finance Corporation's publication on consolidations, mergers and shared management services as stated in Request 105.
9. Grayson's emergency response plan as stated in Request 107.
10. Training and seminars which includes the addresses and social security numbers of the Directors as stated in Request 9.
11. Safety investigations which includes the dates of birth and drivers' licenses numbers of employees as stated in Request 28.

KRS 61.878 provides that records confidentially disclosed to an agency which are generally recognized as confidential or proprietary or which, if openly disclosed, would permit an unfair commercial advantage to competitors of the discloser shall be granted confidential treatment. Pursuant to said statute and 807 KAR 5:001, Section 13, Grayson moves the Commission to grant confidential treatment in full to the documents stated above. As required by the regulation, these documents are being submitted to the Commission marked "confidential." Grayson further requests that the documents be granted confidentiality in perpetuity. The

documents are submitted with this motion and are labeled as Exhibits which correspond to the numbered paragraphs below.

The documents related to employee rates of pay, worker's compensation data, salary ranges of employees, and long term disability rates are quite sensitive in nature (Exhibits 1, 2, 6, 7). Grayson notes that it has submitted quite a large amount of financial data to the Commission recently as part of its rate case. Grayson further notes that management audits are not typically conducted within the context of a case and such materials would, therefore, not usually be submitted for public viewing. In particular, allowing for the public disclosure of employee pay rates and salary ranges with names attached could lead to dissention within the employee base of Grayson. This type of particular and personal information is not typically disclosed for public viewing.

The documents concerning the amount of capital credits owed to individual estates and the information provided to the Board in advance of its meetings (Exhibits 3, 4) contain personal information of the members of Grayson including names, addresses and other financial information. Grayson believes its members would not wish for their personal information to be disclosed in a public forum, and Grayson owes a duty to those members to protect their private information. Personal identifying information of a utility's consumers is and has been generally regarded as confidential.

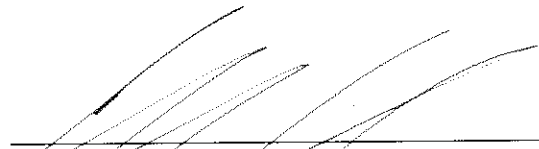
Grayson further seeks confidentiality for the Cooperative Finance Corporation's (CFC) publication concerning consolidations, mergers and shared management services (Exhibit 8). The publication is proprietary in nature as stated on page 2 of the publication. Grayson wishes to honor the wishes of CFC in this regard.

Certain documents subject to data requests also include personal identifying information of Directors and employees (Exhibits 10, 11). The documents that would be responsive to these request include the social security numbers and addresses of the Directors and the dates of birth and drivers' license numbers of employees involved in safety incidents. This type of personal information has typically been considered confidential in nature due to concerns of identity theft.

Finally, Grayson seeks confidentiality for its administrative guidelines and its emergency response plan (Exhibits 5, 9). This information is proprietary in nature and the disclosure of it creates the risk that this information could be used to the detriment of Grayson and its members. This information could be used by terrorists or by individuals who intend disruption to Grayson or the greater electric grid.

For the foregoing reasons, Grayson Rural Electric Cooperative Corporation seeks confidential treatment for the documents and information as stated in this motion.

Respectfully submitted by,



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