

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)	

**MOTION FOR CONFIDENTIAL TREATMENT OF CERTAIN
INFORMATION AND DOCUMENTS PROVIDED BY GRAYSON RECC
IN CONJUNCTION WITH ITS AUDIT ACTION PLAN UPDATE**

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 provided to the Commission in conjunction with its action plan status update filed contemporaneously with this motion. As grounds for this motion, Grayson Rural Electric Cooperative Corporation (“Grayson”) states as follows:

With the audit conducted by Vantage Energy Consulting, LLC having been completed, Grayson is in the process of implementing its action plan. On October 9, 2020, Grayson filed with the Commission a status update to keep the Commission apprised of its efforts with respect to implementing the plan. Grayson has filed certain exhibits to that status update for which it seeks confidential treatment as follows:

1. Grayson seeks confidential treatment for the entirety of Exhibit A to the status update which consists of a document provided by the Cooperative Finance Corporation (CFC) for the benefit of Grayson. The document is a financial forecast prepared by CFC using its proprietary software. CFC has specifically asked that Grayson not disclose this document in a public manner.

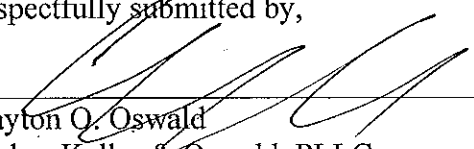
Based on CFC's willingness to assist Grayson with this task and upon CFC's request that the document not be disclosed, Grayson hereby requests confidentiality for Exhibit A to its status plan.

2. Grayson likewise requests confidential treatment for Exhibit C to the status update which consists of a spreadsheet with member complaints. Grayson seeks confidential treatment for this document inasmuch as it contains the names and personal information of some of its members which raises privacy concerns.

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. The document created by CFC utilized propriety software and methods and the member records are generally recognized as confidential. 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.

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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