

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO THE)	
OPERATIONAL CAPACITY AND)	CASE NO.
INFRASTRUCTURE OF GRAYSON RURAL)	2020-00018
ELECTRIC COOPERATIVE CORPORATION)	

**MOTION FOR CONFIDENTIAL TREATMENT OF DOCUMENTS
PROVIDED BY GRAYSON RECC IN RESPONSE TO COMMISSION ORDER**

Grayson Rural Electric Cooperative Corporation, by counsel, hereby requests that the Commission grant confidential treatment to certain information and documents provided to the Commission in response to its recent order. As grounds for this motion, Grayson Rural Electric Cooperative Corporation (“Grayson”) states as follows:

This matter arises from two management audits of Grayson, one of which focused on Grayson’s financial and management practices, and the other of which focused on Grayson’s operations. Those case were consolidated into the present case. The audits resulted in several recommendations which required Grayson to file periodic status reports with the Commission.

On June 13, 2023, the Commission entered an order finding that Grayson had complied with the audit recommendations and that it should be relieved from filing further status reports, and that the case be closed. However, the order requested that upon execution of a new union contract that Grayson file in post-case correspondence a copy of the wage and salary study and the insurance benefit study. Contemporaneously with the filing of this motion, Grayson is filing with the Commission the new union contract and the NRECA Compensation Analysis Report a/k/a the salary and wage study.

However, there are certain documents and portions of certain documents for which Grayson seeks confidentiality. First, confidentiality is sought for a benefits/health insurance study which was conducted in house. The study was conducted by Grayson personnel contacting other electric cooperatives in the state to compare health insurance plans to determine if the premiums paid by Grayson are within the range of those paid by other cooperatives. The information from those other cooperatives was provided to Grayson confidentially, and since it is information from cooperatives which are not parties to this proceeding, confidentiality is hereby requested.

Second, Grayson seeks confidentiality for certain portions of an Excel spreadsheet which was prepared for Grayson by the National Rural Electric Cooperative Association (NRECA) as supporting documentation for the wage and salary study. Grayson has no objection to making public the portion of the spreadsheet which identifies the job positions at Grayson, their corresponding rates of pay and the range of pay identified by the study, but Grayson requests confidentiality for the remainder of the Excel spreadsheet. The remaining information in the spreadsheet is the confidential and proprietary data of NRECA based upon its own information and models. The Excel spreadsheet was provided to Grayson with the understanding that this information would remain confidential due to its proprietary nature.

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, Grayson moves the Commission to grant confidential treatment to the information and documents set forth

above. As required by the regulation, these documents are being submitted to the Commission marked “confidential.” Grayson further requests that the documents and information be granted confidentiality in perpetuity.

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

Respectfully submitted by,

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