

**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)	2020-00018
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 counsel, and hereby requests that the Commission grant confidential treatment to certain information and document 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:

Pursuant to PSC case 2018-00272, the Commission ordered a management audit, case 2019-00101. Vantage Energy Consulting, LLC was selected to complete the audit. Following the audit, the Commission opened case 2020-00018 to investigate the operations of Grayson Rural Electric Cooperative Corporation. The Liberty Consulting Group was selected to complete the operations audit. With the audit having been completed, Grayson is in the process of completing and implementing its action plan. On October 15, 2021 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 portion 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 component from 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 tax 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 document 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.

3. Grayson also requests confidential treatment for Exhibit F, which discusses Grayson's financial plans and goals. The CFC has requested this information be treated as confidential. 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.

4. Grayson also seeks confidential treatment for Exhibit J, which involves potential mergers. In support of this request, Grayson states that confidential and proprietary information

are often exchanged during discussions regarding acquisition and merger. The discussions took place during Grayson's executive session. All discussions during executive session will remain confidential unless the Board of Directors take action based upon those discussions. Furthermore, a Cooperative's membership may be alarmed and confused should they learn such discussions have or may occur.

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

Respectfully submitted,

/s/ Hon. Derrick E. Willis
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