

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF: ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES, A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO DEPLOY ADVANCED METERING INFRASTRUCTURE, APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS, AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT	<b>Case No. 2020-00349</b>
IN THE MATTER OF: ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES, A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO DEPLOY ADVANCED METERING INFRASTRUCTURE, APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS, AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT	<b>Case No. 2020-00350</b>

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

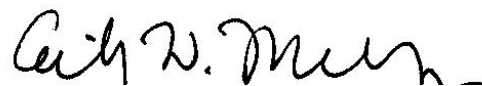
Pursuant to 807 KAR 5:001, Section 13 and KRS 61.878(1), the United States Department of Defense and all other Federal Executive Agencies (DOD-FEA) hereby moves for confidential protection for the items described herein. KRS 61.878(c)(1) provides that disclosure of generally recognized confidential or 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 7a and 7b; in the response to Commission Staff's Initial Request for Information Number 1, 3, 11a, 11b, 11c, and

11d are Christopher C. Walters' work papers 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 the Commission's Order 2020-00085, DOD-FEA will email the confidential information, via DOD SAFE, its file exchange system, to [PSCED@ky.gov](mailto:PSCED@ky.gov). If problems arise with accessing DOD SAFE, I can be reached at [Emily.w.medlyn.civ@mail.mil](mailto:Emily.w.medlyn.civ@mail.mil) or (571)723-2076. 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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