

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Electronic Application of Water Service)
Corporation of Kentucky for a General) Case No. 2022-00147
Adjustment in Existing Rates and a Certificate)
of Public Convenience and Necessity to Deploy)
Advanced Metering Infrastructure and Approval)
Of Certain Regulatory Accounting Treatment)

PETITION FOR CONFIDENTIAL TREATMENT

Water Service Corporation of Kentucky (“WSCK”), pursuant to 807 KAR 5:001, Section 13, respectfully requests the Public Service Commission to grant confidential protection for three documents being filed as an update on August 16, 2022.

First, WSCK is requesting confidential treatment of the contents of the “Wage and Benefit Study, Water Service Corporation of Kentucky, Revised August 2022” (“Revised Wage and Benefit Study”) that ScottMadden Management Consultants (“ScottMadden”) prepared. On May 31, 2022, WSCK filed a motion requesting confidential treatment of the original Wage and Benefit Study. The same reasons justify confidential treatment of the Revised Wage and Benefit Study. Accordingly, WSCK adopts and incorporates its arguments presented in the May 31, 2022 motion.¹

¹ That Motion is available at this link:
https://psc.ky.gov/pscecf/2022-00147/tosterloh%40sturgillturner.com/05312022042412/4 - Petition_for_Confidential_Treatment.PDF

Second, WSCK is requesting confidential treatment of portions of the Excel file “PSC DR 1-49 Exhibit 18-32-29 - Schedule B - S&W-PR Taxes-Benefits CONFIDENTIAL UPDATED 8.10.2022.xlsx,” which is an update to an Excel file submitted in response to Item 49 of the Commission Staff’s First Data Request. On June 28, 2022, WSCK filed a motion requesting confidential treatment of the original Excel file. The same reasons justify confidential treatment for the updated Excel file. Accordingly, WSCK adopts and incorporates its arguments presented in the June 28, 2022, motion²

Third, WSCK is requesting confidential treatment of portions of the Excel file “PSC DR 1-49 Exhibit 29 - Schedule C - 2023 CAM Forecast 2022-2025 - CONFIDENTIAL UPDATED 8.16.22.xlsx,” which is an update to an Excel file submitted in response to Item 49 of the Commission Staff’s First Data Request. On June 28, 2022, WSCK filed a motion requesting confidential treatment of the original Excel file. The same reasons justify confidential treatment for the updated Excel file. Accordingly, WSCK adopts and incorporates its arguments presented in the June 28, 2022, motion³

WSCK requests that the information be kept confidential for an indefinite period of time because of the highly personally confidential and proprietary nature of the information at issue. This is consistent with the Commission’s prior orders for such compensation studies. *See, e.g., Cumberland Valley Electric, Inc.*, Case No. 2014-00159, (Ky. PSC May 7, 2015).

WHEREFORE, WSCK respectfully requests that the Commission grant confidential protection for the information described herein.

² That Motion is available at this link:

https://psc.ky.gov/pscecf/2022-00147/tosterloh%40sturgillturner.com/06282022052327/2_-_WSCK_Petition_for_Confidential_Treatment_DR_1.pdf

³ That Motion is available at this link:

https://psc.ky.gov/pscecf/2022-00147/tosterloh%40sturgillturner.com/06282022052327/2_-_WSCK_Petition_for_Confidential_Treatment_DR_1.pdf

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC



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