

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

In the Matter of:

ELECTRONIC JOINT APPLICATION OF	)	
KENTUCKY UTILITIES COMPANY AND	)	
LOUISVILLE GAS AND ELECTRIC COMPANY	)	
FOR CERTIFICATES OF PUBLIC	)	CASE No. 2022-00402
CONVENIENCE AND NECESSITY AND SITE	)	
COMPATIBILITY CERTIFICATES AND	)	
APPROVAL OF A DEMAND SIDE	)	
MANAGEMENT PLAN AND APPROVAL OF	)	
FOSSIL FUEL-FIRED GENERATING UNIT	)	
REQUIREMENTS	)	

**JOINT INTERVENORS' PETITION FOR CONFIDENTIAL PROTECTION**

Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Metropolitan Housing Coalition (collectively "Joint Intervenors") by counsel, petition the Public Service Commission of Kentucky ("Commission") pursuant to 807 KAR 5:001 Section 13 to grant confidential protection for certain information Joint Intervenors are providing as part of their witness testimony. In support of this Petition, Joint Intervenors state as follows:

1. In an abundance of caution, we are filing this Petition for Confidential Protection with respect to Witness Anna Sommer's testimony and workpapers, which utilizes information that is subject to prior Petitions for Confidential Protection submitted by Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") (collectively "Companies") in order to generate new information that Companies maintain is also confidential.
2. Witness Sommer's testimony and workpapers contain and discuss confidential information subject to prior Petitions for Confidential Protection.
3. Utilizing confidential information provided to Joint Intervenors pursuant to a


confidentiality agreement, Witness Anna Sommer's testimony used PLEXOS and SERVUM models to generate new information through new modeling runs.

4. It is the Companies' position that this new information is also confidential for the same reasons provided in Companies' prior Petitions for Confidential Protection.

5. Witness' Sommer's results, having relied on confidential information, is appropriate for confidential protection as well.

WHEREFORE, Joint Intervenors respectfully request that the Commission grant confidential protection for all of the information described herein.

Respectfully submitted,



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Commonwealth, Kentucky Solar Energy Society,  
and Mountain Association*

**CERTIFICATE OF SERVICE**

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on July 14, 2023, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in black ink, appearing to read 'Tom FitzGerald', with a long horizontal line extending to the right.

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Tom FitzGerald  
*Counsel for Joint Intervenors, Metropolitan  
Housing Coalition, Kentuckians for the  
Commonwealth, Kentucky Solar Energy Society,  
and Mountain Association*