

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF TAYLOR COUNTY) CASE NO.
RURAL ELECTRIC COOPERATIVE CORPORATION) 2023-00147

MOTION FOR REHEARING

Comes now, Taylor County Rural Electric Cooperative Corporation (“Taylor County” or the “Company”), by and through counsel, pursuant to KRS 278.400 and respectfully requests the Kentucky Public Service Commission (“Commission”) to grant rehearing on its October 20, 2023 Order (“October 20th Order”) in the above-styled case.

In support of this motion, Taylor County respectfully states as follows:

1. On June 6, 2023, Taylor County filed an Application for a general adjustment of rates.
2. The Commission entered a letter noting no deficiencies with the filed Application on June 7, 2023.
3. The Commission entered an Order on June 15, 2023 suspending Taylor County’s rates for five months until December 6, 2023 and entering a procedural schedule.
4. Taylor County proceeded to respond to four rounds of discovery from Commission Staff and two rounds of discovery from the Office of the Attorney General.
5. The Commission entered an Order on October 20, 2023 granting in part and denying in part Taylor County’s motion for confidentiality on three items filed into the record.

6. Taylor County requests rehearing on the spreadsheet filed in response to the Office of Attorney General's First Request for Information, Item 3. Taylor RECC argued that this information should be granted confidential protection pursuant to KRS 61.878(1)(a) because disclosure of the information would be an unwarranted invasion of personal privacy.

7. The Commission found that Taylor County's response to Attorney General's First Request, Item 3, should not be given confidential treatment.

8. The Commission further explained its finding, stating that the spreadsheet provided does not contain any personal identifying information as required by 61.878(1)(a). Additionally, the spreadsheet contains some executive salaries, which are generally not granted confidential treatment.

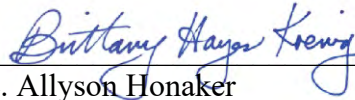
9. Taylor County respectfully disagrees with the Commission's ruling and requests rehearing on the spreadsheet filed in response to AG 1-3, for the non-executive employees. The spreadsheet lists the employee title, the total pay, the annual percentage raise, awards and vehicle allowance. The fact that the spreadsheet contains titles that identify individuals that are not executives means that it provides personal information regarding the total pay received by these non-executive employees, and therefore, it meets the definition of information that is of a personal nature that invades the personal privacy of the non-executive employees as required by 61.878(1)(a). The small number of employees at Taylor County and the specific circumstances of the utility, filing this information into the public record, makes it easy for anyone to figure out each employees total pay.

10. Taylor County is filing an updated spreadsheet which only redacts the titles of the non-executive employees.

WHEREFORE, on the basis of the foregoing, Taylor County respectfully requests that the Commission grant rehearing regarding the material that would reveal personal and private information on the spreadsheet filed in response to AG 1-3 for the non-executive employees.

This 9th day of November, 2023.

Respectfully submitted,

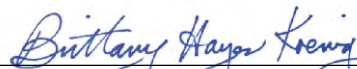


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CERTIFICATE OF SERVICE

This is to certify that the electronic filing was transmitted to the Commission November 9, 2023 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be made.



Counsel for Taylor County RECC

ATTACHMENT
FILED UNDER SEAL
PURSUANT TO A
MOTION FOR
CONFIDENTIAL
TREATMENT