

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

In the Matter of:

ELECTRONIC TARIFF FILING OF BIG RIVERS)	
ELECTRIC CORPORATION AND KENERGY)	Case No. 2023-00312
CORP. TO REVISE THE LARGE INDUSTRIAL)	
CUSTOMER STANDBY SERVICE TARIFF)	

**DOMTAR PAPER COMPANY, LLC's
MOTION FOR CONFIDENTIAL TREATMENT OF INFORMATION**

Domtar Paper Company, LLC (“Domtar”) hereby moves the Kentucky Public Service Commission (“Commission”), pursuant to 807 KAR 5:001 Section 13 and KRS 61.878, to grant confidential treatment to certain information Domtar has filed in response to Big Rivers Electric Corporation’s and Kenergy Corporation’s First Requests for Information. The information for which Domtar seeks confidential treatment is hereinafter referred to as the “Confidential Information.” Domtar has filed with the Commission under seal an original copy of the information for which confidential treatment is sought.

Pursuant to KRS 61.878(1)(c)(l), the following records are exempted from disclosure under the Kentucky Open Records Act:

[R]ecords confidentially disclosed to an agency or required by an agency to be disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records....¹

The Confidential Information for which Domtar seeks protection is generally recognized as confidential and proprietary under Kentucky law. That Confidential Information consists of workpapers containing detailed billing information and internal cost modeling produced by Domtar. Such data is commercially sensitive, proprietary, and would provide an unfair

¹ KRS 61.878(l)(c).

commercial advantage to competitors of Domtar, if disclosed. The Confidential Information is kept confidential by Domtar and not disseminated to others unless they have a legitimate need to know and act upon the information.

Pursuant to 807 KAR 5:001 Section 13(3)(a)(2), Domtar requests that the Confidential Information remain protected for a period of five (5) years from the date of this Motion, which should allow sufficient time for the information to become historical and sufficiently outdated that it could not be used to determine similar confidential information at that time or to competitively disadvantage Domtar.

WHEREFORE, based on the foregoing, Domtar respectfully requests that the Commission grant its Motion for Confidential Treatment of Information.

Respectfully submitted,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLawfirm.com

jkylercohn@BKLawfirm.com

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**COUNSEL FOR DOMTAR PAPER COMPANY,
LLC**