

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

IN THE MATTER OF:

ELECTRONIC APPLICATION OF KENTUCKY-)	
AMERICAN WATER COMPANY FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO. 2025-00240
AND NECESSITY FOR INSTALLATION OF)	
ADVANCED METERING INFRASTRUCTURE)	

PETITION FOR CONFIDENTIAL PROTECTION

Kentucky-American Water Company (“Kentucky American Water” or “Company”), petition the Public Service Commission of Kentucky (“Commission”) pursuant to 807 KAR 5:001 Section 13 to grant confidential protection for certain information the Company is providing in Exhibit A to the Application in this matter. In support of its Petition, Kentucky American Water states the following:

Confidential or Proprietary Commercial Information (KRS 61.878(1)(c)(1))

1. The Kentucky Open Records Act exempts from disclosure certain records which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records.¹ Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. Exhibit A to the Application in this matter contains information constituting or related to meter vendor, meter pricing, and installation labor costs Kentucky American Water considered in assessing AMI and the cost/benefit analysis that identified a selected metering option. Exhibit A also contains meter and meter component prices. Kentucky American Water

¹ KRS 61.878(1)(c)(1).

requests that the vendor names, installation labor costs, and meter and meter component prices be kept confidential.

3. If the information for which confidential protection is sought is disclosed publicly, it could damage the Company's ability to negotiate with meter vendors to obtain favorable pricing. This would disadvantage Kentucky American Water in its negotiations for these items. For these reasons, Kentucky American Water requests that the confidential items identified in Exhibit A to the Application be treated as confidential.

Confidential Information Subject to this Petition

4. The information for which Kentucky American Water is seeking confidential treatment is not known outside of Kentucky American Water, their consultants with a need to know the information, and the Company's counsel, is not disseminated within Kentucky American Water except to those employees with a legitimate business need to know and act upon the information, and is generally recognized as confidential and proprietary information.

5. Kentucky American Water will disclose the confidential information, pursuant to a confidentiality agreement, to intervenors with a legitimate interest in this information and as required by the Commission.

6. If the Commission disagrees with this request for confidential protection, it must hold an evidentiary hearing (a) to protect Kentucky American Water's due process rights and (b) to supply the Commission with a complete record to enable it to reach a decision with regard to this matter.²

7. Kentucky American Water is filing with the Commission one electronic copy that identifies with redactions the information for which confidential protection is sought. In

² *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, 642 S.W.2d 591, 592-94 (Ky. App. 1982).

accordance with the Commission's March 24, 2020 and July 22, 2021 Orders in Case No. 2020-00085, Kentucky American Water will provide unredacted copies noting the confidential information with highlighting to the Commission. Access to the confidential information will be provided to intervenors upon request pursuant to a confidentiality agreement.

8. Kentucky American Water requests that confidential protection be granted for five years due to the sensitive nature of the information at issue.

WHEREFORE, Kentucky-American Water Company respectfully requests that the Commission grant confidential protection for all of the information described herein.

Respectfully submitted,

Lindsey W. Ingram III

L.Ingram@skofirm.com

Monica H. Braun

Monica.braun@skofirm.com

STOLL KEENON OGDEN PLLC

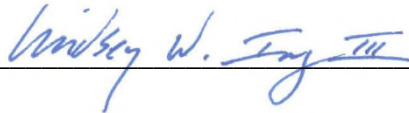
300 West Vine Street, Suite 2100

Lexington, Kentucky 40507-1801

Telephone: (859) 231-3000

Fax: (859) 259-3503

BY: _____

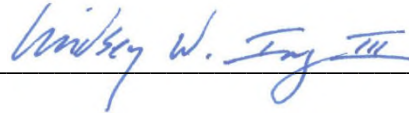


Attorneys for Kentucky-American Water Company

CERTIFICATE

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 11, 2025; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

STOLL KEENON OGDEN PLLC

By 

Attorneys for Kentucky-American Water Company