

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 (“KAWC” or “Company”), petitions 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 response to Item No. 20 of the Attorney General’s Second Request for Information. In support of its Petition, KAWC 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. Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. In response to Item No. 20 of the Attorney General’s Second Request for Information, KAWC is providing copies of the Company’s contracts with third party meter installation providers. The contracts include the pricing terms that KAWC has negotiated with the providers. If this pricing information is publicly disclosed, KAWC could be unable to obtain better pricing for installation services, as other suppliers would know KAWC’s current costs. Moreover,

vendors may be unable to offer favorable terms to KAWC in the future if it learns this information is publicly disclosed.

Confidential Information Subject to this Petition

3. The information for which KAWC is seeking confidential treatment is not known outside of KAWC, their consultants with a need to know the information, and the Company's counsel, is not disseminated within KAWC 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.

4. KAWC 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.

5. If the Commission disagrees with this request for confidential protection, it must hold an evidentiary hearing (a) to protect KAWC'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.¹ In accordance with the Commission's March 24, 2020 and July 22, 2021 Orders in Case No. 2020-00085, KAWC will provide unredacted copies noting the confidential information with highlighting to the Commission.

6. KAWC 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.

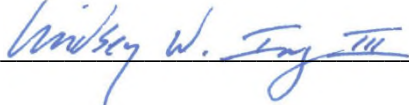
¹ *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, 642 S.W.2d 591, 592-94 (Ky. App. 1982).

Respectfully submitted,

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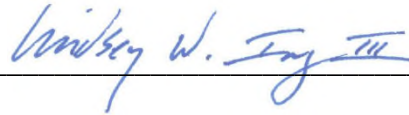
BY: _____

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 September 24, 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