

RECEIVED (812) 168-7740

AUG 25 2015

PUBLIC SERVICE  
COMMISSION

August 25, 2015

*Via Hand Delivery*

Mr. Jeffrey Derouen  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

Re: *In the Matter of: An Examination by the Public Service Commission of the Environmental Surcharge Mechanism of East Kentucky Power Cooperative, Inc. for the Six-Month Billing Period Ending December 31, 2013 and the Pass Through Mechanism for its Sixteen Member Distribution Cooperatives, Case No. 2014-00051*

Dear Mr. Derouen:

On behalf of East Kentucky Power Cooperative, Inc. ("EKPC"), please accept this as a request for clarification of certain language set forth in the Commission's Order entered on August 5, 2015, in the above-styled case (the "Order"). On August 22, 2014, EKPC tendered a Motion for Confidential Treatment that concerned certain confidential information provided by EKPC in response to Commission Staff's Third Request for Information, Item 5.b., dated August 7, 2014. In the Motion, EKPC sought to keep the names of its industrial customers and the names of various substations used to serve those customers confidential. EKPC did not seek confidential treatment for the rates, usage data or other information set forth on the invoice to Members.

EKPC believes that the scope of the original request may have been unclear because the Order granted confidential protection to customer usage and substation usage data, but denied confidential protection to the rates, customer names and substation names. If EKPC were to supply the information again pursuant to the Commission's Order, this would essentially give access to the public to all of the information provided by EKPC, as anyone would be able to piece together the information provided on August 22, 2014, and the new information to be provided pursuant to this Order.

While the information tendered on August 22, 2014 is propriety and confidential, EKPC attempted to transparently respond to the Commission's data requests by redacting the minimum amount of information necessary to preserve the confidentiality of EKPC's billing records. The information sought to be granted confidential treatment is highly sensitive information and if disclosed, could result in competitive disadvantage to EKPC as set out in KRS 61.878(1)(c)(1). It

**Mr. Jeff Derouen**  
**August 25, 2015**  
**Page Two**

would disclose detailed billing and usage information about EKPC's industrial customers to other utilities and economic development agencies that might seek to lure industry out of EKPC's service territory or even out of Kentucky.

EKPC respectfully requests clarification as to whether the original redaction of the customer names and substation names – which leaves intact all other information contained on the billing invoices – is sufficient to comply with the Order, or whether additional filings are necessary. EKPC regrets that the scope of the information sought to be kept confidential was unclear.

Should you have any questions or require additional information, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read "D.S. Samford", with a large flourish extending from the end.

David S. Samford