## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

DEC 29 2011

In the Matter of

PUBLIC SERVICE COMMISSION

THE PETITION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY FOR CONFIDENTIAL	)	2011 00 500
TREATMENT OF CERTAIN INFORMATION	)	CASE NO. 2011-00523
CONTAINED IN ITS QUARTERLY GAS	)	
SUPPLY CLAUSE FILING	)	

# PETITION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR CONFIDENTIAL TREATMENT OF CERTAIN INFORMATION CONTAINED IN ITS QUARTERLY GAS SUPPLY CLAUSE FILING

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, Section 7, petitions the Commission to classify and protect as confidential certain information that is contained in its Quarterly Gas Supply Clause filing, as more fully described below:

1. LG&E is filing contemporaneously with this Petition, as required by its tariffs governing its Gas Supply Clause (Original Sheet Nos. 85.1 and 85.2 of LG&E Gas Tariff PSC No. 8), a statement setting forth the summary of the total purchased gas costs for the period of August 2011 through October 2011 ("Summary"). Included in the Summary, which is included in the filing as two pages in Exhibit B-1, pages 5 and 6, is certain information the disclosure of which would damage LG&E's competitive position and business interests. As required by 807 KAR 5:001, Section 7(2)(b), LG&E is providing one copy of this Summary, under seal, with the material for which confidential treatment is requested highlighted, and ten copies of the Summary with the confidential material redacted.

- 2. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party.
- The Summary contains sensitive commercial information, the disclosure of which would injure LG&E's ability to negotiate future gas supply contracts at advantageous prices and, thereby, minimize the price of natural gas to its customers, and would unfairly advantage LG&E's competitors for both gas supplies and retail gas load. Any impairment of its ability to obtain the most advantageous price possible from natural gas producers and marketers will necessarily erode LG&E's competitive position vis-a-vis other energy suppliers that compete in LG&E's service territory, as well as other LDCs with whom LG&E competes for new and relocating industrial customers. This sensitive information identifies LG&E's natural gas suppliers for the period set forth and links those providers with specific gas volumes delivered and the costs thereof. Redacting the suppliers' names from the Summary will prevent other parties from piecing together the sensitive information which LG&E seeks to protect from disclosure. LG&E, therefore, proposes that the identity of each supplier be kept confidential.

Disclosure of the suppliers' identities will damage LG&E's competitive position and business interest in two ways. First, it will allow LG&E's competitors to know the unit price and overall cost of the gas LG&E is purchasing from each supplier. This information is valuable to LG&E's competitors because it can alert them to the identity of LG&E's low cost suppliers, and if those supply agreements are more favorable than theirs, they can attempt to outbid LG&E for those suppliers. This would raise prices to LG&E which would hurt its competitive position and harm its ratepayers. Second, it will provide competitors of LG&E's suppliers with information which will enable future gas bidding to be manipulated to the competitors'

advantage and to the detriment of LG&E and its customers. Instead of giving its best price in a bid, a gas supply competitor with knowledge of the recent pricing practices of LG&E's other suppliers could adjust its bid so that it just beats other bidders' prices or other terms. As a result, LG&E and its customers will pay a higher price for gas than they would have otherwise.

- 4. LG&E has filed identical requests with the Commission with regard to the same information contained in prior quarterly Gas Supply Clause filings, which the Commission has granted.
- 5. The information in the Summary for which LG&E is seeking confidential treatment is not known outside of LG&E and the relevant suppliers, and it is not disseminated within LG&E except to those employees with a legitimate business need to know and act upon the information.
- 6. The public interest will be served by granting this Petition in that competition among LG&E's prospective gas suppliers will be fostered, and the cost of gas to LG&E's customers will thereby be minimized. In addition, the public interest will be served by fostering full and fair competition between LG&E and other energy service providers within LG&E's gas service territory.

WHEREFORE, Louisville Gas and Electric Company respectfully requests that the Commission classify and protect as confidential the identity of the gas suppliers listed in the statement that sets forth the summary of the total purchased gas costs for the period of August 2011 through October 2011 and that is included in the three month filing made concurrently herewith pursuant to LG&E's Gas Supply Clause.

### Respectfully submitted,

J. Gregory Cornett

Senior Corporate Attorney

LG&E and KU Services Company

220 West Main Street

P. O. Box 32010

Louisville, Kentucky 40232

(502) 627-2756

Counsel for Louisville Gas and Electric Company

#### **CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing instrument was shipped via United Parcel Service on the 29th of December, 2011, to the Office of the Attorney General, Office for Rate Intervention, 1024 Capital Center Drive, Frankfort, Kentucky 40601-8204.

J. Gregory Cornett

DELIVERED BY TEXAS GAS TRANSMISSION, LLC	AUGUST 2011			SE	PTEMBER 2011		OCTOBER 2011			
COMMODITY AND VOLUMETRIC CHARGES:	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	
NATURAL GAS SUPPLIERS:										
1. A	388,771	379,289	\$1,701,667.50	376,230	367,054	\$1,455,675.00	388,771	379,289	\$1,443,747.50	
2 , B	70,000	68,293	\$284,100.00	0	0	\$0.00	223,705	218,249	\$809,403.10	
3 , C	391,620	382,068	\$1,611,675.00	378,989	369,745	\$1,492,140.00	391,598	382,047	\$1,401,270.00	
4 , D	0	0	\$0.00	0	0	\$0.00	285,000	278,049	\$1,078,648.00	
<b>5</b> ,	70,000	68,293	\$283,825.00	0	0	\$0.00	20,000	19,512	\$73,350.00	
6, F	48,068	46,896	\$196,279.85	0	0	\$0.00	164,782	160,763	\$598,465.33	
7 , G	48,190	47,015	\$198,499.76	0	0	\$0.00	38,687	37,743	\$140,100.00	
8 , H	43,275	42,219	\$176,122.60	0	0	\$0.00	62,686	61,157	\$232,925.00	
9,	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00	
10 . J	135,016	131,723	\$554,450.00	112,438	109,696	\$428,001.02	302,835	295,449	\$1,077,711.19	
11 K	0	0	\$0.00	0	0	\$0.00	14,466	14,113	\$53,775.00	
12 . L	0	0	\$0.00	0	0	\$0.00	110,271	107,581	\$408,190.01	
13 , M	298,964	291,672	\$1,304,790.00	250,744	244,628	\$990,340.00	0	0	\$0.00	
14 . N	142,500	139,024	\$633,890.40	655,500	639,512	\$2,582,844.80	114,000	111,219	\$431,459.20	
15 , O	135,016	131,723	\$561,400.00	57,811	56,401	\$224,798.15	366,916	357,967	\$1,322,850.00	
16 , P	10,000	9,756	\$40,500.00	0	0	\$0.00	0	0	\$0.00	
17 . Q	269,068	262,505	\$1,173,981.50	234,360	228,644	\$903,474.00	0	0	\$0.00	
18 , R	3,333	3,252	\$13,531.98	0	0	\$0.00	0	0	\$0.00	
19 , S	135,016	131,723	\$549,200.00	28,932	28,226	\$112,950.00	347,700	339,220	\$1,242,741.76	
20 , T	451,850	440,829	\$1,859,625.00	437,310	426,644	\$1,721,700.00	0	0	\$0.00	
21 . U	96,440	94,088	\$393,875.00	0	0	\$0.00	193,102	188,392	\$703,000.00	
	2,737,127	2,670,368	\$11,537,413.59	2,532,314	2,470,550	\$9,911,922.97	3,024,519	2,950,750	\$11,017,636.09	
NO-NOTICE SERVICE ("NNS") STORAGE:										
1 . WITHDRAWALS	0	0	\$0.00	30,939	30,184	\$120,779.67	121,442	118,480	\$445,935.02	
2 . INJECTIONS	(154,099)	(150,340)	(\$658,958.14)	(129,149)	(125,999)	(\$504,171.87)	(351,526)	(342,952)	(\$1,290,803.47)	
3 , ADJUSTMENTS	3,099	(2,394)	\$13,614.22	1,273	(1,616)	\$5,443.60	0	(1,828)	\$0.00	
4 . ADJUSTMENTS	0	0	(\$630.32)	0	0	(\$218.95)	0	0	\$0.00	
5 . ADJUSTMENTS	0	0	\$26,505.02	0	0	(\$20,951.95)	0	00	(\$105,263.48)	
NET NNS STORAGE	(151,000)	(152,734)	(\$619,469.22)	(96,937)	(97,431)	(\$399,119.50)	(230,084)	(226,300)	(\$950,131.93)	
NATURAL GAS TRANSPORTERS:										
			0400 750 00							
1 . TEXAS GAS TRANSMISSION, LLC	•	40.400	\$138,750.96	_		\$136,114.13	_		\$151,923.98	
2 ADJUSTMENTS	0	46,122	\$195.58	0	51,174	\$79.98	0	47,155	(\$0.56)	
3 ADJUSTMENTS	0 500 457	0 500 750	\$0.00	0	0	\$0,00	0	0	\$0.00	
TOTAL	2,586,127	2,563,756	\$138,946.54	2,435,377	2,424,293	\$136,194.11	2,794,435	2,771,605	\$151,923.42	
TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$11,056,890.91			\$9,648,997.58			\$10,219,427.58	
DEMAND AND FIXED CHARGES:										
1 . TEXAS GAS TRANSMISSION, LLC			00.40.000.00			****			*********	
			\$942,883.60			\$912,468.00			\$1,683,516.38	
2 , ADJUSTMENTS 3 , SUPPLY RESERVATION CHARGES			\$0.00			\$0.00			\$0.00	
4 . ADJUSTMENTS			\$248,852.80			\$246,174.88			\$470,275.24	
5 . CAPACITY RELEASE CREDITS			\$0.00			\$0.00			\$0.00	
			\$0,00			\$0.00			\$0.00	
6 ADJUSTMENTS			\$0.00			\$0.00			\$0.00	
TOTAL DEMAND AND FIXED CHARGES			\$1,191,736.40			\$1,158,642.88			\$2,153,791.62	
TOTAL PURCHASED GAS COSTS TEXAS GAS TRANSMISSION, LLC			\$12,248,627.31			\$10,807,640.46			\$12,373,219.20	

#### LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM AUGUST 2011 THROUGH OCTOBER 2011

DELIVERED BY TENNESSEE GAS PIPELINE COMPANY		AUGUST 2011		s	EPTEMBER 201	1	OCTOBER 2011		
COMMODITY AND VOLUMETRIC CHARGES:	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$
NATURAL GAS SUPPLIERS:									
1. V	310,000	300,971	\$1,347,144.06	300,000	291,262	\$1,165,974.30	310,000	300,971	\$1,160,567.77
2 . W	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00
3 , X	303,893	295,042	\$1,237,425.00	294,090	285,524	\$1,141,650.00	303,893	295,042	\$1,068,375.00
4 . Y	303,893	295,042	\$1,237,425.00	294,090	285,524	\$1,141,650.00	303,893	295,042	\$1,068,375.00
5 . Z	322,214	312,829	\$1,311,220.04	311,820	302,738	\$1,209,696.34	322,214	312,829	\$1,131,976.39
	1,240,000	1,203,884	\$5,133,214.10	1,200,000	1,165,048	\$4,658,970.64	1,240,000	1,203,884	\$4,429,294.16
NATURAL GAS TRANSPORTERS:									
1 . TENNESSEE GAS PIPELINE COMPANY			\$21,700.00			\$21,000,00			\$21,700.00
2 TENNESSEE GAS PIPELINE COMPANY			\$21,948.00			\$21,240.00			\$21,948.00
3 ADJUSTMENTS	(1,307)	22,921	(\$5,971.03)	(686)	25,632	(\$2,943.63)	(151)	30,634	(\$611.51)
4 . ADJUSTMENTS	0	0	\$13,447.54	0	0	\$0.00	(,	0	\$0.00
5 ADJUSTMENTS	0	0	\$21,932.92	0	0	\$0.00	0	0	\$0.00
TOTAL	1,238,693	1,226,805	\$73,057.43	1,199,314	1,190,680	\$39,296.37	1,239,849	1,234,518	\$43,036.49
TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$5,206,271.53			\$4,698,267.01			\$4,472,330.65
DEMAND AND FIXED CHARGES:  1 . TENNESSEE GAS PIPELINE COMPANY  2 . TRANSPORTATION BY OTHERS  3 . SUPPLY RESERVATION CHARGES  4 . CAPACITY RELEASE CREDITS			\$329,664.00 \$0.00 \$0.00 \$0.00			\$329,664.00 \$0.00 \$0.00 \$0.00			\$329,664.00 \$0.00 \$0.00 \$0.00
TOTAL DEMAND AND FIXED CHARGES			\$329,664.00			\$329,664.00			\$329,664.00
TOTAL PURCHASED GAS COSTS - TENNESSEE GAS PIPEL	INE COMPANY		\$5,535,935.53			\$5,027,931.01			\$4,801,994.65
OTHER PURCHASES  1 . CASH-OUT OF CUSTOMER OVER-DELIVERIES TOTAL		18,282 18,282	\$77,544.13 \$77,544.13	-	26,014 26,014	\$81,388.54 \$81,388.54	_	16,392 16,392	\$61,292.02 \$61,292.02
TOTAL PURCHASED GAS COSTS – ALL PIPELINES	3,824,820	3,808,843	\$17,862,106.97	3,634,691	3,640,987	\$15,916,960.01	4,034,284	4,022,515	\$17,236,505.87

11/14/2011 15:11