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February 21, 2007

Beth O'Donnell,
Executive Director,
Kentucky Public Service Commission
P.O. Box 615,
211 Sower Boulevard,
Frankfort, Kentucky 40602-0615
Phone (502) 564-3940

RECEIVED

FEB 22 2007

PUBLIC SERVICE
COMMISSION

Re: **Case No. 2007-00008**

Dear Ms. O'Donnell,

Enclosed for filing with the Commission in the above docket is the original and ten copies of the Petition of Columbia Gas of Kentucky, Inc. ("Columbia") for Confidential Treatment of Data Requested by the Commission.

Pursuant to 807 KAR 5:001 Section 7(2), attached to the original copy of the Petition, and filed under seal, is a copy of the subject data responses containing the confidential information identified by yellow highlighting. All other copies of this Petition include as the attachment the data responses with the confidential information redacted.

Also enclosed is an extra copy that contains the redacted text. Please return the extra copy containing the redacted text to me after it has been date-stamped by the Commission. Thank you for your assistance.

As always, if you have any questions, please call me at 724.416.6328 or e-mail me at mkempic@nisource.com.

Sincerely,

Mark Kempic

Enclosures

cc: Hon. Richard S. Taylor
Hon. Stephen B. Seiple

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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FEB 22 2007

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF AN ADJUSTMENT)
OF GAS RATES OF COLUMBIA GAS)
OF KENTUCKY, INC.)

CASE NO. 2007-00008

ORIGINAL

PETITION OF COLUMBIA GAS OF KENTUCKY, INC.
FOR CONFIDENTIAL TREATMENT OF DATA

Columbia Gas of Kentucky, Inc. ("Columbia") has this same day served in the instant matter responses to the "First Data Request of Commission Staff to Columbia Gas of Kentucky, Inc." served on Columbia on January 25, 2007. Two of Columbia's responses contain information that is confidential and proprietary to Columbia and as well as information of a personal nature. Specifically, Data Request No 31(f) and 42 seek the names of various officers and employees of the Columbia as well as specific information about their annual compensation.

Pursuant to 807 KAR 5:001, Section 7, Columbia is requesting confidential treatment for its responses to those two specific data request. Columbia provided redacted versions of both responses to the parties and is willing to enter into protective agreements with parties to this case under which agreement Columbia will provide the parties with the confidential information. Attached to the original copy of this Petition, as Attachment A, is a copy of both responses with the

confidential information identified by yellow highlighting. All other copies of this Petition include as Attachment A, both responses with the confidential information obscured.

The specific salary information for the time period provided is non-public information, which if disclosed publicly would invade those individual employees' privacy. With the exception of possibly three employees whose salaries may be publicly released later this year as part of the annual proxy statement, Columbia has never publicly released the information in these two data requests. Upon filing its annual proxy statement with the Securities and Exchange Commission later this year, Columbia will make public the information on these responses which was filed with the Securities and Exchange Commission.

This confidential salary information is not disclosed to the public, and is being provided only to the Commission in compliance with 807 KAR 5:001, Section 7. Kentucky's Revised Statutes provide a specific exemption from disclosure for such personal information.

In view of the foregoing considerations, the data should be classified as confidential, pursuant to KRS §§ 61.870 *et seq.*, on the following specific grounds:

- (1) Individual employee salary information is exempt from disclosure pursuant to KRS § 61.878(1)(a) because it contains "information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy".
- (2) All the information provided herewith is further exempt from disclosure pursuant to KRS 61.878(1)(1), which exempts "information the disclosure of which is prohibited or restricted or otherwise made confidential by enactment of the General Assembly." This is so in this case because the personal salary information constitutes information

of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy under the express language of 61.878(1)(a) It is also kept confidential by Columbia, and is therefore “the subject of efforts that are reasonable under the circumstances to maintain its secrecy.”

By granting this Petition and providing for confidential treatment of Columbia’s responses to these two data request, the Commission and the parties can fully evaluate Columbia’s proposed application for an adjustment in rates, while maintaining the general confidentiality of such data, thereby balancing the public interest with the personal privacy concerns identified in KRS 61.878(1)(a).

WHEREFORE, Columbia respectfully requests that the Commission issue an order authorizing the confidential treatment of Columbia's gas price hedging plan attached hereto, pursuant to 807 KAR 5:001, Section 7, for the reasons stated herein.

Dated at Canonsburg, Pennsylvania, this 21st day of February 2007.

Respectfully submitted,

COLUMBIA GAS OF KENTUCKY, INC.

By: Mark Kempic

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