## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of

THE PETITION OF LOUISVILLE GAS AND
ELECTRIC COMPANY FOR CONFIDENTIAL
TREATMENT OF CERTAIN INFORMATION
CONTAINED IN ITS QUARTERLY GAS

PUBLIC SERVICE
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CONTAINED IN ITS QUARTERLY GAS

PUBLIC SERVICE
COMMISSION

COMMISSION

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 February 2011 through April 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.
- 3. 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 February 2011 through April 2011 and that is included in the three month filing made concurrently herewith pursuant to LG&E's Gas Supply Clause.

Respectfully submitted,

Allyson K. Sturgeon

Senior Corporate Attorney

LG&E and KU Services Company

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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 30th of June, 2011, to the Office of the Attorney General, Office for Rate Intervention, 1024 Capital Center Drive, Frankfort, Kentucky 40601-8204.

Allyson K. Sturgeon

\$347,900.00 \$1,603,875.00 \$0.00 \$122,100.00 \$508,660.00 \$263,760.00 \$552,065.00 \$1,355,260.50 \$0.00 \$4,753,620.50 (\$2,380,184,44) \$35,347.33 (\$0.22) (\$2,545,941.22) \$376,049.36 \$0.00 (\$27,000.00) \$0.00 \$2,408,783,17 \$1,383,088.80 \$242,506.60 \$1,598,595.40 \$4,007,378.57 86,462 (585,371) 5,730 79,975 367,054 120,432 62,098 128,972 305,493 28,226 25,646 0 493,179) **APRIL 2011** NET MMBTU 81,974 376,230 88,624 (600,005) 0 0 608,174 123,443 63,650 132,196 313,130 (511,381) 28,932 1,119,555 \$2,359,875.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$5,189,917.35 \$1,554,561.11 (\$391,187.91) \$1,163,373,20 (\$0.19)\$0.00 \$0.00 \$3,407,310.24 \$0.00 \$255,774.40 \$0.00 \$0.00 \$95,242.80 \$6,448,533.16 \$95,242.61 \$2,479,166.10 \$9,183,473.66 \$2,734,940.50 398,415 (100,257) 9,525 (143,780)866,483 MARCH 2011 ,335,263 307,683 22,923 ,665,869 (147,375) 0 408,375 (102,763) 0 0 1,674,257 888,146 NET MMBT 627,874 1,368,645 \$0.00 \$1,210,376.85 \$0.00 \$1,261,426.32 \$0.00 (\$136,426.90) \$0.00 \$1,384,146.12 (\$536,849.04) \$5,631,693.35 (\$32,157.90) \$0.00 \$0.00 \$0.00 \$2,379,610.45 \$107,142.48 (\$0.25) \$0,00 \$436,997.48 \$0.00 \$0.00 \$2,449,020.00 \$2,411,768.35 \$0.00 \$107,142.23 \$8,118,446.03 (\$700.00) \$2,239,246.80 \$2,675,544.28 \$10,793,990.31 FEBRUARY 2011 541,081 (7,215) 7,209 (28,319)306,740 290,541 49,700 282.057 ,879,312 NET MMBTU (29,027)314,408 (118,656) 320,750 554,608 (7,395) 547,213 297,805 289,108 1,867,963 TOTAL PURCHASED GAS COSTS - TEXAS GAS TRANSMISSION, LLC TOTAL COMMODITY AND VOLUMETRIC CHARGES DELIVERED BY TEXAS GAS TRANSMISSION, LLC NO-NOTICE SERVICE ("NNS") STORAGE: TOTAL DEMAND AND FIXED CHARGES COMMODITY AND VOLUMETRIC CHARGES: NATURAL GAS SUPPLIERS; 2 . ADJUSTMENTS
3 . SUPPLY RESERVATION CHARGES
4 . ADJUSTMENTS
6 . ADJUSTMENTS
6 . ADJUSTMENTS **AmCDEFGH-**> NATURAL GAS TRANSPORTERS:
1 . TEXAS GAS TRANSMISSION, LLC
2 . ADJUSTMENTS
3 . ADJUSTMENTS DEMAND AND FIXED CHARGES: 1 . TEXAS GAS TRANSMISSION, LLC **NET NNS STORAGE**  WITHDRAWALS 3 . ADJUSTMENTS 4 . ADJUSTMENTS 5 . ADJUSTMENTS INJECTIONS 26450786077

LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM FEBRUARY 2011 THROUGH APRIL 2011

\$0.00 (\$1,460.76) \$0.00 \$0.00 (\$1,460.76) \$0.00 \$329,664.00 \$0.00 \$0.00 \$0.00 \$201,813.87 (\$1,460.76)\$329,664.00 \$4,537,395.68 \$328,203.24 2,487 0 0 0000 2.487 53,807 681,011 **APRIL 2011** (355) 0000 607,819 \$662,628.72 (\$659,696.13) \$550,607.68 \$553,540.27 \$2,767.35 (\$1,103.23) \$30.00 \$10,681,470.72 \$0.00 \$1,694.12 \$0.00 \$0.00 \$157,362.34 \$555,234.39 \$329,664.00 \$455,736,33 \$785,400.33 \$1,340,634.72 171,980 (154,374) 135,922 153,528 4,918 0 0 39,660 158,446 1,863,975 **MARCH 2011** 177,139 (159,005) 140,000 158,134 (255) NET MMBTU 157,879 1,832,136 \$0.00 \$988,183.68 \$1,974,047.68 \$7,669.97 (\$3,805.12) (\$7,998.12) \$0.00 (\$4,133.27) \$329,664.00 \$0.00 \$417,537.54 \$0.00 \$249,357.36 \$13,760,463.62 \$985,864.00 \$2,717,115.95 \$1,969,914.41 \$747,201.54 FEBRUARY 2011 12,685 0 213,592 213,590 2,377,796 (821) 0 0 439,177 NET MMBTU 219,998 439,998 220,000 2,307,140 TOTAL PURCHASED GAS COSTS - TENNESSEE GAS PIPELINE COMPANY TOTAL COMMODITY AND VOLUMETRIC CHARGES DELIVERED BY TENNESSEE GAS PIPELINE COMPANY COMMODITY AND VOLUMETRIC CHARGES: NATURAL GAS SUPPLIERS; OTHER PURCHASES

1 . CASH-OUT OF CUSTOMER OVER-DELIVERIES
TOTAL TOTAL PURCHASED GAS COSTS - ALL PIPELINES NATURAL GAS TRANSPORTERS:
1 . TENNESSEE GAS PIPELINE COMPANY
2 . ADJUSTMENTS
3 . ADJUSTMENTS
4 . ADJUSTMENTS
TOTAL DEMAND AND FIXED CHARGES.

1. TENNESSEE GAS PIPELINE COMPANY
2. TRANSPORTATION BY OTHERS
3. SUPPLY RESERVATION CHARGES
4. CAPACITY RELEASE CREDITS TOTAL DEMAND AND FIXED CHARGES ΣZO

LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM FEBRUARY 2011 THROUGH APRIL 2011