



DUKE ENERGY CORPORATION

139 East Fourth Street
1212 Main
Cincinnati, OH 45201-0960
Telephone: (513) 287-4315
Facsimile: (513) 287-4385

Kristen Cocanougher
Sr. Paralegal
E-mail: Kristen.cocanougher@duke-energy.com

VIA OVERNIGHT DELIVERY

July 6, 2011

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

RECEIVED
JUL 07 2011
PUBLIC SERVICE
COMMISSION

Re: In the Matter of Duke Energy Kentucky, Inc.'s Integrated Resource Plan
Case No. 2011-00235

Dear Mr. Derouen:

Enclosed please find the Attachment to Section 8(3)(a), which is the map that depicts the existing transmission systems of Duke Energy Kentucky and Duke Energy Ohio. This map was inadvertently omitted from the original filing of Duke Energy Kentucky's Integrated Resource Plan on July 1, 2011. Please note that this Attachment is highly confidential and Duke Energy Kentucky requested confidential treatment of this document in its Petition for Confidential Treatment also filed on July 1. I have included a courtesy copy of that Petition.

We apologize for any inconvenience that this omission may have caused.

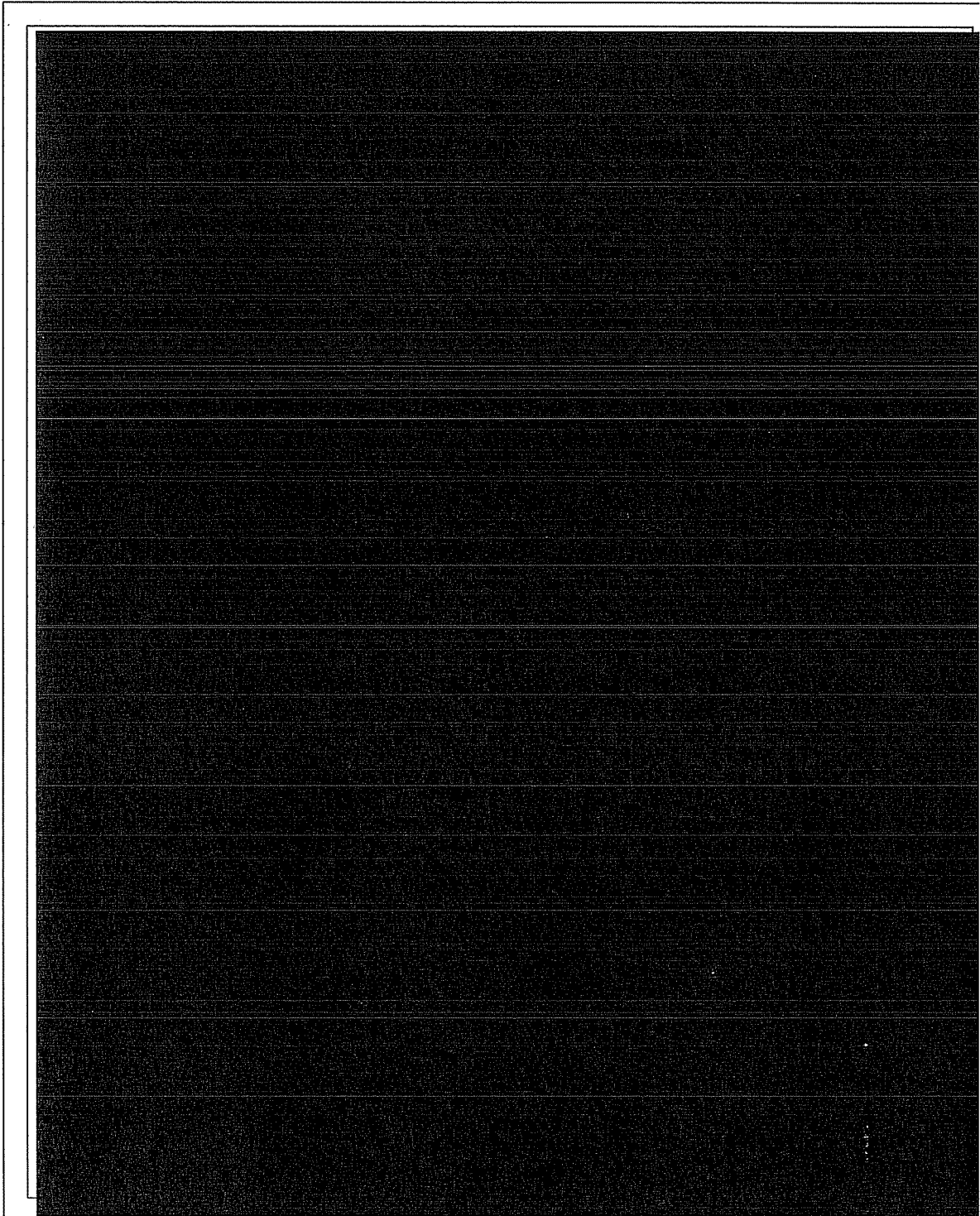
Please date-stamp the extra two copies of this letter and return to me in the enclosed envelope.

Sincerely,

Kristen Cocanougher

cc: Dennis Howard (w/enclosures)
Florence Tandy (w/enclosures)
Carl Melcher (w/enclosures)

0



JUL 07 2011

RECEIVED

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of Duke Energy Kentucky, Inc.'s) Case No. 2011-_____
Integrated Resource Plan)
)

PETITION OF DUKE ENERGY KENTUCKY, INC.
FOR CONFIDENTIAL TREATMENT OF INFORMATION
CONTAINED IN ITS INTEGRATED RESOURCE PLAN

Duke Energy Kentucky, Inc. ("Duke Energy Kentucky" or "Company"), pursuant to 807 KAR 5:001, Section 7, respectfully requests the Commission to classify and protect certain information that is contained in Duke Energy Kentucky's 2011 Integrated Resource Plan ("IRP") contemporaneously filed with this Petition. The information that Duke Energy Kentucky seeks confidential treatment generally includes: (1) information related to operations and management ("O&M") costs, projected fuel and environmental compliance costs, power market prices, emission allowance cost, energy efficiency program and avoided cost, projected capacity, and resource alternative capital costs; (2) information regarding projected sales and revenue requirements; (3) supply side screening curves and resource evaluations; and (4) critical transmission system maps.

The public disclosure of the information described would place Duke Energy Kentucky at a commercial disadvantage as it negotiates contracts with various suppliers and vendors and potentially harm Duke Energy Kentucky's competitive position in the marketplace, to the detriment of Duke Energy Kentucky and its customers. Moreover, Duke Energy Kentucky's transmission system maps show the location of critical infrastructure

necessary to deliver safe and reliable electric service to its consumers. The public release of this information would create a security risk for both the Company and its customers.

In support of this Petition, Duke Energy Kentucky states:

1. 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. Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. The information regarding power production costs that Duke Energy Kentucky wishes to protect from public disclosure -- including supply side screening curves, projected costs of fuel and O&M expenses, capital costs, power market prices, projected capacity and present value revenue requirements ("PVRR") -- is identified in the filing submitted concurrently herewith. This information was developed internally by Duke Energy Kentucky personnel, is not on file with any public agency, and is not available from any commercial or other source outside Duke Energy Kentucky. The aforementioned information is distributed within Duke Energy Kentucky only to those employees who must have access for business reasons. If publicly disclosed, this information setting forth Duke Energy Kentucky's costs of operation, expected need for fuel and allowances and projected capacity could give competitors an advantage in bidding for and securing new resources. Similarly, disclosure would afford an undue advantage to Duke Energy Kentucky's vendors and suppliers as they would enjoy an obvious advantage in any contractual negotiations to the extent they could calculate Duke Energy Kentucky's requirements and what Duke Energy Kentucky

anticipates those requirements to cost. Finally, public disclosure of this information, particularly as it relates to supply-side alternatives, would reveal the business model Duke Energy Kentucky uses -- the procedure it follows and the factors and inputs it considers -- in evaluating the economic viability of various generation related projects. Public disclosure would give Duke Energy Kentucky's contractors, vendors and competitors access to Duke Energy Kentucky's cost and operational parameters, as well as insight into its contracting practices. Such access would impair Duke Energy Kentucky's ability to negotiate with prospective contractors and vendors, and could harm the Duke Energy Kentucky's competitive position in the power market, ultimately affecting the costs to serve customers.

3. Duke Energy Kentucky requests confidential protections for certain third-party data contained in the IRP. In developing the 2011 IRP, Duke Energy Kentucky used certain confidential and proprietary data modeling consisting of confidential information belonging to third parties who take reasonable steps to protect their confidential information, such as only releasing such information subject to confidentiality agreements. Duke Energy Kentucky used forecasts of various commodities and inputs such as SO₂ emission allowances prices, NO_x emission allowance prices, mercury emission allowance prices, power market prices, coal prices, gas prices, and oil prices developed by an independent third party, Ventyx Energy, LLC, subject to confidentiality restrictions. Duke Energy Kentucky is contractually bound to maintain such information confidential. Moreover, this information is deserving of protection to protect Duke Energy Kentucky's customers. If allowance brokers or equipment vendors knew Duke Energy Kentucky's forecasted emissions and fuel prices, by station or otherwise, such brokers or vendors would have an unfair advantage in negotiating future emission allowance or emission control equipment sales, to the detriment of Duke Energy

Kentucky and its customers. Furthermore, if competitors of Duke Energy Kentucky knew such forecasts, they could have an advantage in competing for new business against Duke Energy Kentucky.

4. Duke Energy Kentucky requests confidential treatment for the transmission system maps included in the IRP. These maps show the location of Critical Energy Infrastructure Information ("CEII"), which has been granted confidential treatment in the past. Duke Energy Kentucky takes all reasonable steps in order to protect the CEII, including, but not limited to, only sharing such information internally on a need to know basis. The reliability entities with access to such data, such as Midwest Independent System Operator ("MISO") also take appropriate precautions to protect such data. This information needs to be kept confidential in order to continue to provide delivery of safe and reliable electric service to Duke Energy Kentucky customers. The release of this information would provide a security risk for the Company and its customers.

5. The information for which Duke Energy Kentucky is seeking confidential treatment is not known outside of Duke Energy Kentucky.

6. The information for which Duke Energy Kentucky is seeking confidential treatment is similar in nature to that contained in the Company's 2008 IRP and which the Commission granted protection on or about January 8, 2009.

7. The information that Duke Energy Kentucky seeks confidential treatment herein demonstrates on its face that it merits confidential protection. If the Commission disagrees, however, it must hold an evidentiary hearing to protect the due process rights of the Company and supply the Commission with a complete record to enable it to reach a

decision with regard to this matter. *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, Ky. App., 642 S.W.2d 591, 592-94 (1982).


8. Duke Energy Kentucky does not object to limited disclosure of the confidential information described herein, pursuant to an acceptable protective agreement, to the Attorney General or other intervenors with a legitimate interest in reviewing the same for the purpose of commenting on Duke Energy Kentucky's 2011 IRP.

9. In accordance with the provisions of 807 KAR 5:001 Section 7, the Company is filing with the Commission one copy of the 2011 IRP under seal and ten (10) copies without the confidential information.

WHEREFORE, Duke Energy Kentucky, Inc. respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,

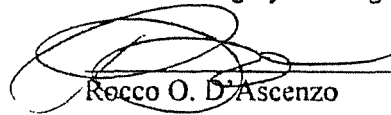
DUKE ENERGY KENTUCKY, INC.



Rocco O. D'Ascenzo (92796)
Associate General Counsel
Amy B. Spiller (85309)
Deputy General Counsel
Duke Energy Business Services, LLC
139 East Fourth Street, 1303 Main
Cincinnati, Ohio 45201-0960
Phone: (513) 287-4320
Fax: (513) 287-4385
e-mail: rocco.d'ascenzo@duke-energy.com
Counsel for Duke Energy Kentucky, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Duke Energy Kentucky, Inc.'s Petition for Confidential Treatment of Information Contained in Duke Energy Kentucky, Inc.'s 2011 Integrated Resource Plan was served on the following by overnight mail, this 1st day of July 2011.


Rocco O. D'Ascenzo

Honorable Dennis G. Howard, II
Assistant Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601

Florence W. Tandy
Northern Kentucky Community Action Commission
P.O. Box 193
Covington, Kentucky 41012

Carl Melcher
Northern Kentucky Legal Aid, Inc.
302 Greenup
Covington, Kentucky 41011