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PUBLIC SERVICE  
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Columbia Gas<sup>®</sup>  
of Kentucky

**A NiSource Company**

290 W. Nationwide Blvd.  
Columbus, Ohio 43215

June 26, 2015

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

RE: In the matter of the Application of Columbia Gas of Kentucky, Inc. for a  
Limited Deviation from the Requirements of 807 KAR 5:022, Section  
14(22)(a), PSC Case No. 2015-00084

Dear Mr. Derouen,

Enclosed for docketing with the Commission are an original and ten (10)  
copies of Columbia Gas of Kentucky, Inc.'s Motion for Confidential Treatment.  
Should you have any questions about this filing, please contact me at 614-460-  
5558.

Very truly yours,



Brooke E. Leslie  
Senior Counsel

Enclosures

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of the Application of Colum- )  
bia Gas of Kentucky, Inc. for a Limited De- )  
viation from the Requirements of 807 KAR )  
5:022, Section 14(22)(a) )

Case No. 2015-00084

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**MOTION OF COLUMBIA GAS OF KENTUCKY, INC.  
FOR CONFIDENTIAL TREATMENT OF DATA**

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Columbia Gas of Kentucky, Inc., ("Columbia") petitions the Kentucky Public Service Commission ("Commission") pursuant to 807 KAR 5:001 § 13 and KRS § 61.878(1)(m(1) to grant confidential protection indefinitely to two responses contained in the Commission Staff's First Request for Information. Specifically, Columbia requests confidential treatment of portions of the responses to Staff DR 2 and Staff DR 5. The information requested is highly confidential, proprietary and the disclosure of which would create reasonable likelihood of threatening the public safety. For the reasons set forth herein, the responses should be given confidential treatment.

**STAFF DR 2 and DR 5**

Staff DR 1-2(b) asks Columbia to "[d]escribe each "distribution system by location and identify the number of district pressure-regulating stations supplying

each location.” Similarly, Staff DR 1-5 asks Columbia to “[i]dentify each location for which a deviation from 807 KAR 5:022, Section 14(22)(a), is sought.” Columbia’s responses to Staff DR 1-2 and 1-5, contained in Attachment A to this Motion, consist of spreadsheets containing the precise addresses of CKY’s distribution system and the locations for which deviation is sought. Pursuant to the foregoing considerations, and as required by 807 KAR 5:001, § 13, the data should be classified as confidential because KRS § 61.878 (1)(m)(1) protects the disclosure of public records that “the disclosure of which would have a reasonable likelihood of threatening the public safety by exposing a vulnerability in preventing, protecting against, mitigating, or responding to a terrorist act.”

This Commission has recognized that maps “are infrastructure records that disclose the location, configuration, or security of public utility systems” and therefore, should be treated as confidential.<sup>1</sup> Here, the information contained in Attachment A, while not an actual map, contains the same identifying information that are included in maps and should be given the same confidential treatment.

By granting this Motion and providing for confidential treatment of Columbia’s responses to the aforementioned data requests, the Commission can fully evaluate Columbia’s proposed Limited Deviation from the Requirements of 807

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<sup>1</sup> Case No. 2014-00166 *In the Matter of: 2104 Integrated Resource Plan of Big Rivers Electric Corporation*, KY PSC Order, p. 7 (August 26, 2014).

KAR 5:022, Section 14(22)(a), while maintaining the general confidentiality of such data, thereby balancing the public interest with the personal safety concerns identified in KRS § 61.878(1)(m)(1). Columbia requests that the information be kept confidential indefinitely as Columbia does not foresee a time when this information would be non-confidential.

**WHEREFORE**, Columbia respectfully requests that the Commission issue an order authorizing the confidential treatment of Columbia's responses to the Attachments contained and described herein, pursuant to 807 KAR. 5:001, Section 13, for the reasons stated herein.

Dated at Columbus, Ohio, this 26<sup>th</sup> day of June 2015.

Respectfully submitted,  
**COLUMBIA GAS OF KENTUCKY, INC.**

By: Stephen B. Seiple / BEZ

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