

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

AN INVESTIGATION OF THE GAS COSTS)
OF SENTRA CORPORATION PURSUANT)
KRS 278.2207, THE WHOLESALE GAS)
PRICE IT IS CHARGED BY ITS AFFILIATE,)
MAGNUM HUNTER PRODUCTION, INC.,)
PURSUANT TO KRS 278.274, AND THE)
STRUCTURE OF THE PURCHASED GAS)
ADJUSTMENT CLAUSE CONTAINED IN)
ITS FILED TARIFF)

Case No. 2016-00139

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APR 22 2016

PUBLIC SERVICE
COMMISSION

PETITION FOR CONFIDENTIALITY

Sentra Corporation (Sentra), by counsel, petitions the Commission ("Commission"), pursuant to 807 KAR 5:001, Section 13, and all other applicable law, for confidential treatment of the items 3 and 4 of the responses to the Commission's order of April 8, 2016. The information in those documents contains strategic information, maps and schematics of the Sentra distribution and transmission systems.

KRS Chapter 61 requires information filed with the Commission to be available for public inspection unless specifically exempted by statute. Exemptions from public disclosure of the information relevant to this petition are provided in KRS 61.878(1)(m). Under the Kentucky Open Records Act, the Commission is entitled to withhold from public disclosure information disclosed to it to the extent that open disclosure 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 and limited to: . . . ,

(f) infrastructure records that expose a vulnerability referred to in this

subparagraph through the disclosure of the location, configuration, or security of critical systems, including public utility critical systems. These critical systems shall include but not be limited to information technology, communications, electrical, fire suppression, ventilation, water, wastewater, sewage, and **gas systems** and;

(g) The following records when their disclosure will expose a vulnerability referred to in this subparagraph: **detailed drawings, schematics, maps, or specifications of structural elements**, floor plans, and operating, utility, or security systems of any building or facility owned, occupied, leased, or maintained by a public agency."

This Commission has recognized that similar reports with diagrams and maps "are infrastructure records that disclose the location, configuration, or security of public utility systems" and therefore, should be treated as confidential. See 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).

The information contained in the specified documents provides detailed information about Sentra's distribution system and the location of critical components; as such, the disclosure of which could threaten the public safety generally and provide sensitive information relevant to the security against terroristic events. Sentra petitions the Commission to classify as confidential and protect from public disclosure the requested report. Because of the nature of the documents, providing a redacted copy for public view would be uninformative and of no practicable value to anyone. Sentra seeks a deviation pursuant 807 KAR 5:001(22) to allow the entire documents to be considered redacted and an exemption from filing a partially redacted version of the

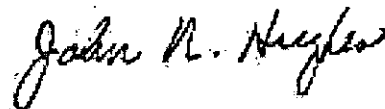
documents for the public record.

The information for which the Company is seeking confidential treatment is not disseminated within the Company except to those employees with a legitimate business need to know and act upon the information and is generally recognized as confidential and proprietary information in the industry.

If the Commission disagrees with this request for confidential protection, Sentra requests that it hold an evidentiary hearing (a) to protect the Company's due process rights and (b) to 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).

Sentra requests that the information referenced herein be kept confidential for an indefinite period.

For these reasons, Sentra petitions the Commission to treat as confidential, indefinitely, the information referenced in this petition in its entirety



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