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May 20, 2016

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PUBLIC SERVICE
COMMISSION

Mr. Aaron Greenwell
Acting Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

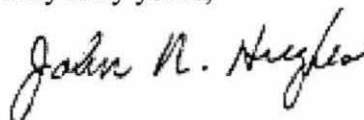
Re: Sentra Corporation: Case No. 2016-00139

Dear Mr. Greenwell:

Sentra submits its responses to the Attorney General and the Staff and supplemental responses to the initial staff request numbers 3, 4 and 8. Included is a petition for confidentiality for the map included with the supplemental response 3. A revised Gas Cost Recovery tariff has been submitted separately using the electronic tariff filing system. A copy of the responses has been served on the Attorney General.

If you have any questions about this matter, please contact me.

Very truly yours,



John N. Hughes

Attorney for Sentra Corporation

Attachments

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

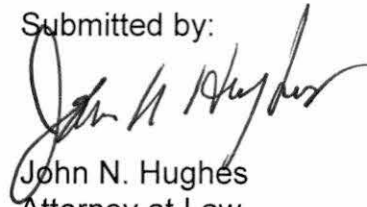
AN INVESTIGATION OF THE GAS COSTS
OF SENTRA CORPORATION PURSUANT
KRS 278.2207, THE WHOLESALE GAS
PRICE IT IS CHARGED BY ITS AFFILIATE,
MAGNUM HUNTER PRODUCTION, INC.,
PURSUANT TO KRS 278.274, AND THE
STRUCTURE OF THE PURCHASED GAS
ADJUSTMENT CLAUSE CONTAINED IN
ITS FILED TARIFF

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) Case No. 2016-00139
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**SUPPLEMENTAL RESPONSE TO COMMISSION'S
ORDER OF APRIL 8, 2016**

Sentra Corporation (Sentra), by counsel, submits the attached supplemental responses to the Commission's order of April 8, 2016. The witness for all responses is Michael Wallen.

Submitted by:



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- 3. Provide the number of connection points between the system of Sentra's wholesale natural gas supplier and the Sentra distribution system.**

WITNESS: Wallen

RESPONSE: Sentra has three connections with Clay Gas Utility District's line from which it buys gas and those three points are marked on the accompanying maps, which are filed pursuant to a confidentiality petition. The line that runs from the connection point in Celina, Tennessee, to the Texas Eastern Interstate pipeline is 14 miles long.

4. Identify the source (interstate or intrastate pipeline, local wells, etc.) of the gas sold to Sentra by its wholesale natural gas supplier.

WITNESS: Wallen

RESPONSE: Gas sold by Sentra is purchased from the Texas Eastern Interstate pipeline.

- 8. State whether Sentra's price for its natural gas purchases reflects current market price conditions. If so, provide support for why Sentra believes this price reflects current market prices. If not, indicate an appropriate price based on current market conditions and provide support for the indicated amount.**

WITNESS: Wallen

RESPONSE: Sentra has reduced the rate charged to its customers to more accurately reflect current gas costs. The rate was reduced from \$14.67 to \$12.03 on January 1, 2016, and reduced again to \$9.50 on April 1, 2016. Sentra is preparing an application for an Alternative Rate Filing, which it expects to submit no later than August 1, 2016.

COMMONWEALTH OF KENTUCKY
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AN INVESTIGATION OF THE GAS COSTS)
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MAGNUM HUNTER PRODUCTION, INC.,)
PURSUANT TO KRS 278.274, AND THE)
STRUCTURE OF THE PURCHASED GAS)
ADJUSTMENT CLAUSE CONTAINED IN)
ITS FILED TARIFF)

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 item 3 of the supplemental 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

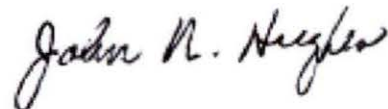
considered redacted and an exemption from filing a partially redacted version of the documents for the public record.

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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