

Commonwealth of Kentucky
Before the Public Service Commission

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**PUBLIC SERVICE
COMMISSION**

In the Matter of:

PURCHASED GAS ADJUSTMENT)	Case No.
FILING OF VALLEY GAS, INC.)	2016-00200

PETITION FOR CONFIDENTIALITY

Valley Gas, Inc. ("Valley Gas") respectfully petitions the Kentucky Public Service Commission ("Commission") pursuant to 807 KAR 5:001 Section 13 and all other applicable law, for confidential treatment of the information which is described below and which is attached hereto. In support of this Petition, Valley Gas states as follows:

1. Valley Gas is responding to the Commission Staff's First Request for Information ("RFI") in the above referenced Purchased Gas Adjustment case. The following three items contain information which requires confidential treatment.
 - a) The attached Exhibit A, which is in response to Staff's RFI number 2 seeking "all contracts related to gas supply, storage, and transportation between Valley Gas and Constellation".
 - b) The attached Exhibit B, which responds to Staff RFI number 3 and contains the invoices from Constellation.
 - c) The data contained in a chart as a portion of the answer to Staff's RFI number 3. This data is collected from the Constellation invoices.
2. The information contained in Exhibit A includes both historical and future fixed pricing on gas. The information contained in Exhibit B and the accompanying chart includes both the price of gas and the volume purchased.
3. All of the information sought to be protected as confidential is sensitive business information, the disclosure of which would harm Valley Gas and its customers. Disclosure of this information would provide an unfair advantage to Valley Gas competitors, and place

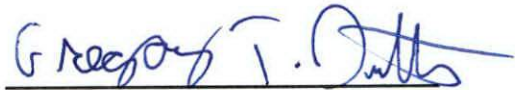
Valley Gas at a competitive disadvantage. Specifically, it may harm Valley Gas in future attempts to attract industrial customers, such as the one Valley Gas recently began serving. Serving industrial customers creates additional benefits to both Valley Gas and its preexisting residential customers. Valley Gas wishes to remain competitive for any possibility of securing additional industrial customers.

4. This type of information has previously been held as confidential by the Commission in the proceedings of other regulated natural gas companies within the Commonwealth.¹ Granting this Petition would be consistent with longstanding Commission precedent.
5. There is no significant interest in public disclosure of the attached information. Any public interest in favor of disclosure of the information is outweighed by interests of Valley Gas remaining competitive and the economies of scale enjoyed by Valley Gas customers, both of which are maintained by keeping the information confidential.
6. The information for which Valley Gas is seeking confidential treatment is not known outside of Valley Gas and the relevant suppliers, and it is not disseminated within Valley Gas except to those employees with a legitimate business need to know and act upon the information.
7. As required by 807 KAR 5:001, Section 2, Valley Gas is providing one copy of the confidential information, under seal, and ten copies of the entire filing with the confidential information redacted or removed. As Valley Gas seeks confidential protection of the entirety of the invoices and purchase contracts with Constellation, those entire documents have been filed under seal.

¹ See Case No. 2014-00212, In the Matter of: Purchased Gas Adjustment Filing of Atmos Energy Corporation, Order dated December 18, 2014; Case No. 2013-00486, In the Matter of: Purchased Gas Adjustment Filing of Gas and Electric Company, Order dated July 14, 2014.

WHEREFORE, Valley Gas, Inc. respectfully requests that the Commission classify and protect as confidential for an indefinite period of time the attached information contained in the file labeled "Confidential".

Respectfully submitted this July 19, 2016.

A handwritten signature in blue ink that reads "Gregory T. Dutton". The signature is stylized and written over a horizontal line.

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