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December 2, 2016

Talina Mathews  
Executive Director  
Public Service Commission  
PO Box 615  
Frankfort, Kentucky 40602-0615

RECEIVED  
DEC 5 2016  
PUBLIC SERVICE  
COMMISSION

RE: Louisville/Jefferson County Metro Government v. Louisville Gas and Electric Company,  
Case No. 2016-00347.

Dear Ms. Mathews,

Please accept for filing on behalf of Louisville/Jefferson County Metro Government, the enclosed Petition for Confidential Protection, Motion to File Addendum and Addendum to Amended Complaint. The filing includes 3 copies, plus an original, per 807 KAR 5:001, Section 20(3). The maps associated with the filing have been filed under confidential seal, per 807 KAR 5:0001, Section 13. Please feel free to contact me if you have any questions about anything contained herein.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Gregory T. Dutton'.

Gregory T. Dutton  
Goldberg Simpson, LLC

RECEIVED

Commonwealth of Kentucky  
Before the Public Service Commission

DEC 5 2016

PUBLIC SERVICE  
COMMISSION

In the Matter of:

Louisville/Jefferson County Metro Government )  
 )  
 Complainant, )  
 )  
 v. )  
 )  
 Louisville Gas and Electric Company )  
 )  
 Defendant. )

Case No.  
2016- 00347

**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT**  
**PETITION FOR CONFIDENTIAL PROTECTION**

Comes now the Louisville/Jefferson County Metro Government (“Louisville Metro”) and hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 13 and KRS § 61.878(1) to grant confidential protection for the items described herein.

Confidential Protection is sought for the entirety of the map titled Jefferson County Gas Mains pursuant to KRS 61.878(1)(m)(1)(f). The map contains the locations of LG&E gas mains located throughout Louisville Metro. Louisville Metro requested Louisville Gas and Electric Company (“LG&E”) to provide the map pursuant to Section 7(a) of the 2016 Gas Franchise Agreement. LG&E only provided Louisville Metro the map pursuant to a nondisclosure agreement between Louisville Metro and LG&E. Because disclosure could threaten the public safety by exposing a vulnerability in preventing, protecting against, mitigating, or responding to a terrorist act, Louisville Metro requests that the materials not be placed in the public record or made available for public inspection for an indefinite period of time.

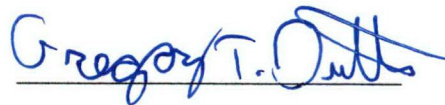
Confidential Protection is sought for the entirety of the map titled Gas Transmission in Kentucky. The map contains the locations of gas transmission lines throughout the Commonwealth of Kentucky. Louisville Metro, through Counsel, requested the Commission provide the map pursuant to an Open Records Request. The Commission only provided the map following the execution of a Use Constraint Agreement, which bars Louisville Metro and its Counsel from redistributing the map. Should LG&E or any other party wish to view the map, they should request such information directly from the Public Service Commission.

WHEREFORE, Louisville Metro respectfully requests the Commission grant confidential protection for the enclosed maps titled Jefferson County Gas Mains and Gas Transmission in Kentucky.

Respectfully submitted,



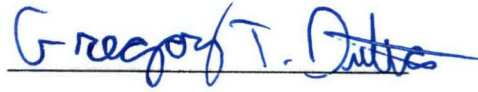
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**CERTIFICATE OF SERVICE**

This is to certify that a true and accurate copy of this document has been served via electronic mail to the persons listed below.

A handwritten signature in blue ink that reads "Gregory T. Dutton". The signature is written in a cursive style and is positioned above a horizontal line.

Gregory T. Dutton

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