# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

SEP 2 9 2005
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In the Matter of

THE PETITION OF LOUISVILLE GAS AND	)		
ELECTRIC COMPANY FOR CONFIDENTIAL	)		
TREATMENT OF CERTAIN INFORMATION	)	CASE NO.	2005-00401
CONTAINED IN ITS QUARTERLY GAS	)		
SUPPLY CLAUSE FILING	)		

## PETITION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR CONFIDENTIAL TREATMENT OF CERTAIN INFORMATION CONTAINED IN ITS QUARTERLY GAS SUPPLY CLAUSE FILING

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, Section 7, petitions the Commission to classify and protect as confidential certain information that is contained in its Quarterly Gas Supply Clause filing, as more fully described below:

1. LG&E is filing contemporaneously with this Petition, as required by its tariffs governing its Gas Supply Clause (Original Sheet Nos. 70.1 and 70.2 of LG&E Gas Tariff PSC of Ky. No. 6), a statement setting forth the summary of the total purchased gas costs for the period of May 2005 through July 2005 ("Summary"). Included in the Summary, which is included in the filing as two pages in Exhibit B-1, pages 5 and 6, is certain information the disclosure of which would damage LG&E's competitive position and business interests. As required by 807 KAR 5:001, Section 7(2)(b), LG&E is providing one copy of this Summary, under seal, with the material for which confidential treatment is requested highlighted, and ten copies of the Summary with the confidential material redacted.

- 2. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party.
- 3. The Summary contains sensitive commercial information, the disclosure of which would injure LG&E's ability to negotiate future gas supply contracts at advantageous prices and, thereby, minimize the price of natural gas to its customers, and would unfairly advantage LG&E's competitors for both gas supplies and retail gas load. Any impairment of its ability to obtain the most advantageous price possible from natural gas producers and marketers will necessarily erode LG&E's competitive position viz-a-vis other energy suppliers that compete in LG&E's service territory, as well as other LDCs with whom LG&E competes for new and relocating industrial customers. This sensitive information identifies LG&E's natural gas suppliers for the period set forth and links those providers with specific gas volumes delivered and the costs thereof. Redacting the suppliers' names from the Summary will prevent other parties from piecing together the sensitive information which LG&E seeks to protect from disclosure. LG&E, therefore, proposes that the identity of each supplier be kept confidential.

Disclosure of the suppliers' identities will damage LG&E's competitive position and business interest in two ways. First, it will allow LG&E's competitors to know the unit price and overall cost of the gas LG&E is purchasing from each supplier. This information is valuable to LG&E's competitors because it can alert them to the identity of LG&E's low cost suppliers, and if those supply agreements are more favorable than theirs, they can attempt to outbid LG&E for those suppliers. This would raise prices to LG&E which would hurt its competitive position and harm its ratepayers. Second, it will provide competitors of LG&E's suppliers with information which will enable future gas bidding to be manipulated to the competitors'

advantage and to the detriment of LG&E and its customers. Instead of giving its best price in a bid, a gas supply competitor with knowledge of the recent pricing practices of LG&E's other suppliers could adjust its bid so that it just beats other bidders' prices or other terms. As a result, LG&E and its customers will pay a higher price for gas than they would have otherwise.

- 4. LG&E has filed identical requests with the Commission with regard to the same information contained in prior quarterly Gas Supply Clause filings, which the Commission has granted.
- 5. The information in the Summary for which LG&E is seeking confidential treatment is not known outside of LG&E and the relevant suppliers, and it is not disseminated within LG&E except to those employees with a legitimate business need to know and act upon the information.
- 6. The public interest will be served by granting this Petition in that competition among LG&E's prospective gas suppliers will be fostered, and the cost of gas to LG&E's customers will thereby be minimized. In addition, the public interest will be served by fostering full and fair competition between LG&E and other energy service providers within LG&E's gas service territory.

WHEREFORE, Louisville Gas and Electric Company respectfully requests that the Commission classify and protect as confidential the identity of the gas suppliers listed in the statement that sets forth the summary of the total purchased gas costs for the period of May 2005 through July 2005 and that is included in the three month filing made concurrently herewith pursuant to LG&E's Gas Supply Clause.

### Respectfully submitted,

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**Counsel for Louisville Gas and Electric Company** 

### **CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing instrument was mailed on the 29th day of September, 2005, to the Office of Attorney General, Office for Rate Intervention, P. O. Box 2000, Frankfort, Kentucky 40602-2000.

Elizabeth L. Cocanougher / W6

#### LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM MAY 2005 THROUGH JULY 2005

DELIVERED BY TEXAS GAS TRANSMISSION, LLC COMMODITY AND VOLUMETRIC CHARGES:		MAY 2005				JUNE 2005		JULY 2005		
		NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$
	NATURAL GAS SUPPLIERS:			<u></u>					-	
1	Α	244,794	238,823	\$1,697,576.40	747,896	729,655	\$4,601,352.00	759,500	740,976	\$5,440,658.72
2	. В	0	0	\$0.00	0	0	\$0.00	325,500	317,561	\$2,301,583.83
3	. C	Ō	ā	\$0.00	0	0	\$0.00	0	0	\$0.00
4	. D	0	ñ	\$0.00	0	Ô	\$0.00	0	0	\$0.00
5	E	o o	0	\$0.00	Ô	Ö	\$0.00	0	0	\$0.00
6	_	369,164	360,160	\$2,471,157.80	359,040	350,283	\$2,172,225.60	371,008	361,959	\$2,570,711.58
7	, G	0	0	\$0.00	0.00,040	0	\$0.00	0	0	\$0.00
8	. Ĥ	Ô	0	\$0.00	o o	0	\$0.00	0	0	\$0.00
9		359,371	350,606	\$2,337,715.00	o o	o o	\$0.00	0	0	\$0.00
10	j	0	0.00,000	\$0.00	o o	0	\$0.00	0	0	\$0.00
11	ĸ	232,500	226,830	\$1,591,426.46	0	0	\$0.00	0	0	\$0.00
12		202,000	0	\$0.00	460,883	449.642	\$2,838,649.71	499,500	487,317	\$3,504,762.23
13	. M	156,459	152,643	\$1,037,200.00	0	0	\$0.00	0	0	\$0.00
14	N N	39.038	38,086	\$250,800.00	(160,576)	(156,660)	(\$1,155,919.00)	0	ō	\$0.00
15		311,176	303,586	\$2,050,342.22	301,260	293,912	\$2,196,692.61	310,000	302,439	\$2,396,205.32
16	P	97,852	95,465	\$641,875.00	(326,872)	(318,899)	(\$2,424,761.64)	0.0,000	0	\$0.00
17	ο .	0 .032	33,403	\$0.00	(320,072)	(510,035)	\$0.00	ñ	0	\$0.00
18	. R	1,559	1,521	\$10,384.00	0	0	\$0.00	0	0	\$0.00
19	, , , , , , , , , , , , , , , , , , ,	ecc,1 0	1,521	\$10,384.00 \$0.00	0	0	\$0.00 \$0.00	0	0	\$0.00
20		-	_		•	0		0	0	\$0.00
21	Ĺ	7,795	7,605	\$51,920.00	0	•	\$0.00	263,500	257,073	\$2,033,994.41
21		66,330	64,712	\$431,120.00		0	\$0.00		2,467,325	\$18,247,916.09
		1,886,038	1,840,037	\$12,571,516.88	1,381,631	1,347,933	\$8,228,239.28	2,529,008	2,407,325	\$10,247,510.05
	NO-NOTICE SERVICE ("NNS") STORAGE:									
	WITHDRAWALS	•		*0.00	•		*0.00	440.700	400 066	\$784,159.90
	INJECTIONS	0	0	\$0.00	0	0	\$0.00	110,768	108,066	
	· · · · · · · · · · · · · · · ·	(1,273,468)	(1,242,408)	(\$8,513,006.23)	(602,186)	(587,499)	(\$3,931,551.96)	(303,581)	(296,177)	(\$2,149,140.97)
3	7.1.= T11.	(118)	(219)	(\$862.52)	(476)	1,550	(\$3,182.01)	(111)	1,950	(\$724.70)
4	· · · · · · · · · · · · · · · · · · ·			\$202.69			\$520.32			\$104.01
5	ADJUSTMENTS			\$1,392,027.86			\$564,248.28			\$294,577.99
	NET NNS STORAGE	(1,273,586)	(1,242,627)	(\$7,121,638.20)	(602,662)	(585,949)	(\$3,369,965.37)	(192,924)	(186,161)	(\$1,071,023.77)
	***************************************									
	NATURAL GAS TRANSPORTERS:									
1	TET TO GIVE THE MICHIGOROFT, ELD			\$33,972.04			\$41,081.26			\$125,997.47
	ADJUSTMENTS	0	(4)	(\$6.95)	0	(3,172)	(\$27.99)	Q	(4,747)	(\$84.14)
3		0	0	\$0.00	0	0_	\$0.00	0	0	\$0.00
	TOTAL	612,452	597,406	\$33,965.09	778,969	758,812	\$41,053.27	2,336,084	2,276,417	\$125,913,33
	TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$5,483,843.77			\$4,899,327.18			\$17,302,805.65
DEM	IAND AND FIXED CHARGES:									
1 TEXAS GAS TRANSMISSION, LLC				\$1,017,960.95			\$982,348.20			\$1,013,179.76
	ADJUSTMENTS			\$0.00			\$6,119.90			\$0.00
3	· · · · · · · · · · · · · · · · · · ·			\$0.00			\$0.00			\$0.00
4 SUPPLY RESERVATION CHARGES				\$213,448.95			\$206,563.50			\$213,448.95
5	5 CAPACITY RELEASE CREDITS			(\$35,960.00)			(\$30,300.00)			(\$22,010.00)
	TOTAL DEMAND AND FIXED CHARGES			\$1,195,449.90			\$1,164,731.60			\$1,204,618.71
	TOTAL PURCHASED GAS COSTS - TEXAS GAS TRANSMI	SSION, LLC		\$6,679,293.67			\$6,064,058.78			\$18,507,424.36

#### LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM MAY 2005 THROUGH JULY 2005

DELIVERED BY TENNESSEE GAS PIPELINE COMPANY		MAY 2005			JUNE 2005		JULY 2005		
COMMODITY AND VOLUMETRIC CHARGES: NET MMBTU		MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$
NATURAL GAS SUPPLIERS:		-							
1 . V	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00
2 W	10,513	10,207	\$69,190.00	900,000	873,786	\$6,616,124.19	930,000	902,913	\$7,164,524.98
3 . X	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00
<b>4</b> , <b>Y</b>	72,635	70,519	\$474,020.00	0	0	\$0.00	0	0	\$0.00
<b>5</b> . <b>Z</b>	195,925	190,218	\$1,292,585.00	0	0	\$0.00	643,094	624,363	\$4,976,085.45
6 , AA	20,070	19,485	\$133,735.00	0	0	\$0.00	0	0	\$0,00
	299,143	290,429	\$1,969,530.00	900,000	873,786	\$6,616,124.19	1,573,094	1,527,276	\$12,140,610.43
NATURAL GAS TRANSPORTERS:									
1 TENNESSEE GAS PIPELINE COMPANY			\$5,235.03			\$15,750.00			\$27,529.15
2 TRANSPORTATION BY OTHERS			\$0.00			\$0.00			\$0.00
3 ADJUSTMENTS	0	0	\$0.00	0	0	(\$0.02)	0	0	\$0.00
4 ADJUSTMENTS	(29)	383	(\$213.62)	(69)	1,060	(\$468.93)	(10,946)	(11,917)	(\$80,933.23)
5 ADJUSTMENTS	0	0	\$0.00	0	0	(\$188,639,63)	0	0	\$0.00_
TOTAL	299,114	290,812	\$5,021.41	899,931	874,846	(\$173,358.58)	1,562,148	1,515,359	(\$53,404.08)
TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$1,974,551.41			\$6,442,765.61			\$12,087,206.35
DEMAND AND FIXED CHARGES:  1. TENNESSEE GAS PIPELINE COMPANY  2. TRANSPORTATION BY OTHERS  3. SUPPLY RESERVATION CHARGES  4. CAPACITY RELEASE CREDITS			\$329,664.00 \$0.00 \$0.00 \$0.00			\$329,664.00 \$0.00 \$0.00 \$0.00			\$329,664.00 \$0.00 \$0.00 \$0.00
TOTAL DEMAND AND FIXED CHARGES			\$329,664.00			\$329,664.00			\$329,664.00
TOTAL PURCHASED GAS COSTS TENNESSEE GAS PIPELINE COMPANY			\$2,304,215.41			\$6,772,429.61			\$12,416,870.35
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OTHER PURCHASES  1 PURCHASED FOR ELECTRIC DEPARTMENT									•
BB	0	0	\$0.00	25,000	24,390	\$190,000.00	152,500	148,779	\$1,212,850.00
CC	0	0	\$0.00 \$0.00	45,500 45,500	44,390 44,390	\$150,000.00 \$353,770.00	140,500	137,074	\$1,132,770.00
DD	0	0	\$0.00	12,500	12,195	\$97,500.00	000,041	0	\$0.00
EE	0	0	\$0.00	12,500	12,193	\$0.00	0	ő	\$0.00
ADJUSTMENTS	0	0	\$0.00	0	0	\$0.00 \$0.00	0	(295)	\$0.00
	<del></del>	- 0	\$0.00	83,000	80,975	\$641,270.00	293,000	285,558	\$2,345,620.00
2 CASH-OUT OF CUSTOMER OVER-DELIVERIES	J	16,515	\$101,305.70	00,000	15,411	\$92,678.77	200,000	12,402	\$90,661.55
TOTAL	0	16,515	\$101,305.70	83,000	96,386	\$733,948.77	293,000	297,960	\$2,436,281.55
TOTAL PURCHASED GAS COSTS - ALL PIPELINES	911,566	904,733	\$9,084,814.78	1,761,900	1,730,044	\$13,570,437.16	4,191,232	4,089,736	<b>\$</b> 33,360,576.26