# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE

In the Matter of

THE PETITION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY FOR CONFIDENTIAL	)	20
TREATMENT OF CERTAIN INFORMATION	)	CASE NO. <u>2006-0</u> 0005
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 August 2005 through October 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 August 2005 through October 2005 and that is included in the three month filing made concurrently herewith pursuant to LG&E's Gas Supply Clause.

### Respectfully submitted,

Robert J. Ehrler

Senior Corporate Attorney

LG&E Energy Corp.

220 West Main Street

P. O. Box 32010

Louisville, Kentucky 40232

(502) 627-4850

**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 December, 2005, to the Office of Attorney General, Office for Rate Intervention, P. O. Box 2000, Frankfort, Kentucky 40602-2000.

Robert I Ebrler

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

DELIVERED BY TEXAS GAS TRANSMISSION, LLC COMMODITY AND VOLUMETRIC CHARGES:		А	UGUST 2005		SE	PTEMBER 2005	i	OCTOBER 2005		
			NET MMBTU MCF		NET MMBTU	MCF	\$	NET MMBTU	MCF	\$
	ATURAL GAS SUPPLIERS:						· · · · · · · · · · · · · · · · · · ·			
1.	Α	691,929	675,053	\$5,340,027.20	704,653	687,466	\$7,296,744.94	560,136	546,474	\$8,002,669.26
2.	В	256,224	249,975	\$2,432,295.45	247,957	241,909	\$3,043,276.95	253,410	247,229	\$3,519,645.07
3	Č	0	0	\$0.00	0	0	\$0.00	0	. 0	\$0.00
4.	ä	Ō	0	\$0.00	Ō	ō	\$0.00	0	0	\$0.00
5	- F	o o	0	\$0.00	Ō	ō	\$0.00	0	0	\$0.00
6.	F	481,000	469,268	\$3,704,316.16	536,500	523,415	\$5,913,722.01	635,243	619,749	\$9,007,001.25
7.	G	0 0	0	\$0.00	0	0	\$0.00	0	0	\$0.00
8.	H	Õ	ő	\$0.00	34,249	33,414	\$428,875.00	209,515	204,405	\$2,750,446.28
9.	i i	316,086	308,377	\$2,410,195,41	428,941	418,479	\$4,402,060.00	0.0,002	0	\$0.00
10 .	A	365,450	356,537	\$2,782,433.45	335,104	326,931	\$3,664,407.60	367,832	358,860	\$5,172,590.40
11 .	v v	0.00,400	0.00,007	\$0.00	0	0	\$0.00	0	0	\$0.00
12	1	0	0	\$0.00	0	0	\$0.00	415,236	405,108	\$5,811,377.38
13	M	310,000	302,439	\$2,960,362.39	351,422	342,851	\$4,474,336.51	309,873	302,315	\$4,291,488.35
14 .	N	310,000	302,439 0	\$0.00	331,422	342,031	\$0.00	11,484	11,204	\$161,668.50
15	0	0	0	\$0.00	0	0	\$0.00	500,348	488,144	\$7,147,782.48
16	P	0	0	•	0	0	\$0.00	84,029	81,980	\$1,132,705.92
10 ,	r		2,361,649	\$0.00 \$19,629,630.06	2,638,826	2,574,465	\$29,223,423.01	3,347,106	3,265,468	\$46,997,374.89
		2,420,689	2,301,049	\$13,023,030.00	2,030,020	2,3/4,403	\$25,225,425.01	3,347,100	3,203,400	\$40,551,557.05
N	O-NOTICE SERVICE ("NNS") STORAGE:									
	WITHDRAWALS	304.050	313,220	\$2,540,661.28	124,665	121,624	\$1,412,030.59	179,490	175,112	\$2,527,273.05
	INJECTIONS	321,050 (47,365)	(46,210)	(\$374,827.66)	(215,888)	(210,622)	(\$2,445,277.02)	(667,146)	(650,874)	(\$9,393,615.82)
	ADJUSTMENTS			• • • •	(215,000)	, , ,	\$3,023.00	(15,925)	(14,854)	(\$180,376.11)
	ADJUSTMENTS	(13,075)	(11,334)	(\$92,561.85) \$19,214.54	302	(1,126)	\$3,023.00 (\$776.05)	(13,323)	(14,054)	\$80,245.21
	ADJUSTMENTS						\$557,988.52			\$4,109,854.31
J	NET NNS STORAGE	260,610	255,676	(\$582,142.59) \$1,510,343.72	(90,841)	(90,124)	(\$473,010.96)	(503,581)	(490,616)	(\$2,856,619.36)
	NET WINS STORAGE	200,010	200,070	\$1,510,343.72	(90,041)	(90,124)	(9473,010.96)	(503,561)	(450,010)	(\$2,000,015.00)
N	ATURAL GAS TRANSPORTERS:									
	TEXAS GAS TRANSMISSION, LLC			\$147,717.75			\$138,061,19			\$144,647.02
	ADJUSTMENTS	0	(17,384)	(\$10,366.41)	0	(13,179)	(\$8,722.80)	0	(16,869)	(\$10,736.05)
	ADJUSTMENTS	0	(17,364)	\$0.00	0	(13,179)	(\$6,722.60) \$0.00	0	(10,009)	\$0.00
J ,	TOTAL	2.681.299	2,599,941	\$137,351.34	2,547,985	2,471,162	\$129,338.39	2,843,525	2,757,983	\$133,910.97
	TOTAL	2,001,299	2,399,941	\$137,331.34	2,347,903	2,471,102	\$129,330.39	2,043,020	2,131,303	\$155,510.57
	TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$21,277,325.12			\$28,879,750.44			\$44,274,666.50
	TOTAL GOMMODITT AND VOLUMETRIC CHARGES			\$21,211,323.12			\$20,075,730.44			\$44,217,000,00
DEMA	ND AND FIXED CHARGES:									
	TEXAS GAS TRANSMISSION, LLC			\$1.013.179.76			\$980,496,54			\$1,745,092.99
	ADJUSTMENTS			\$0.00			\$0.00			(\$965.52)
	ADJUSTMENTS			\$0.00			\$0.00			\$0.00
	SUPPLY RESERVATION CHARGES			\$195,280.25			\$198.870.65			\$447,698.53
	CAPACITY RELEASE CREDITS			(\$22,010.00)			(\$21,300.00)			(\$22,010.00)
J.	CAPACH ( NELEAGE CREDITS			(\$22,010.00)			(\$21,300.00)			(\$22,010.00)
	TOTAL DEMAND AND FIXED CHARGES			\$1,186,450.01			\$1,158,067.19			\$2,169,816.00
	TOTAL PURCHASED GAS COSTS - TEXAS GAS TRANSMISSI	ION II C		\$22,463,775.13			\$30,037,817.63			\$46,444,482.50
	TOTAL STREET CAS GOODS - TEXAS GAS TRANSINGS			WEE, 400, 110.10			CU.11 0, 100,000			\$-TO, -T-T-, -TOZOO

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

DELIVERED BY TENNESSEE GAS PIPELINE COMPANY	A	AUGUST 2005		SEPTEMBER 2005			OCTOBER 2005		
COMMODITY AND VOLUMETRIC CHARGES:	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$
NATURAL GAS SUPPLIERS:									
1. Q	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00
2 . R	0	ō	\$0.00	Ō	0	\$0.00	0	0	\$0.00
3, S	606.343	588.683	\$5,738,132.88	475.352	461,507	\$5,457,551.28	290,372	281,915	\$3,472,506.33
4 , T	0	0	\$0.00	31,782	30,856	\$343.585.00	0	0	\$124,245.00
5 . U	907,421	880,991	\$8,573,196.01	895,035	868,966	\$10,210,936,98	1,263,456	1,226,656	\$15,698,612.94
	1,513,764	1,469,674	\$14,311,328.89	1,402,169	1,361,329	\$16,012,073.26	1,553,828	1,508,571	\$19,295,364.27
		.,,	, , ,						
NATURAL GAS TRANSPORTERS:									
1 . TENNESSEE GAS PIPELINE COMPANY			\$26,490.87			\$24,537.97			\$27,192.01
2 . TRANSPORTATION BY OTHERS			\$0.00			\$0.00			\$0.00
3 , ADJUSTMENTS	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00
4 ADJUSTMENTS	9,622	6,558	\$70,899.16	1,099	(1,138)	\$10,447.64	(34)	(10,436)	\$108.32
5 . ADJUSTMENTS	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00
TOTAL	1,523,386	1,476,232	\$97,390.03	1,403,268	1,360,191	\$34,985.61	1,553,794	1,498,135	\$27,300.33
TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$14,408,718.92			\$16,047,058.87			\$19,322,664.60
DEMAND AND FIXED CHARGES:									
1 . TENNESSEE GAS PIPELINE COMPANY			\$329,664.00			\$329,664.00			\$329,664.00
2. TRANSPORTATION BY OTHERS			\$0.00			\$0.00			\$0.00
3 . SUPPLY RESERVATION CHARGES			\$0.00			\$0.00			\$0.00
4 . CAPACITY RELEASE CREDITS			\$0.00			\$0.00			\$0.00
TOTAL DEMAND AND FIXED CHARGES			\$329,664.00			\$329,664.00			\$329,664.00
TOTAL DUDGULOTO CAR COSTO TENNITORES CAR DUDGULOS						#10 ama maa am			*40.050.000.00
TOTAL PURCHASED GAS COSTS - TENNESSEE GAS PIPELIN		\$14,738,382.92			\$16,376,722.87			\$19,652,328.60	
OTHER PURCHASES									
1 . PURCHASED FOR ELECTRIC DEPARTMENT									
V	070.000	000 000	£0 540 000 00	400.000	405.050	£4 540 050 00	72.000	74 040	£4 424 050 00
•	273,000	266,339	\$2,549,090.00	129,000	125,853	\$1,546,350.00	73,000	71,219	\$1,124,050.00
Ŵ	78,000	76,098	\$745,630.00	99,397	96,972	\$1,327,095.11	8,000	7,805	\$132,240.00
X	18,816	18,357	\$251,030.00	0	0	\$0.00	0	0	\$0.00
Y	0	0	\$0.00	0	0	\$0.00	22,000	21,463	\$338,670.00
TEXAS GAS TRANSMISSION, LLC	0	0	\$5,236.49	0	0	\$0.00	0	0	\$6,122.60
ADJUSTMENTS		(2,080)	\$0.00	0	(2,278)	\$0.00	0	(1,695)	\$0.00
A CARL OUT OF CUSTOMER OVER BEINGE	369,816	358,714	\$3,550,986.49	228,397	220,547	\$2,873,445.11	103,000	98,792	\$1,601,082.60
2 . CASH-OUT OF CUSTOMER OVER-DELIVERIES		6,885	\$54,376.51		114,570	\$1,154,157.31	100.05	18,615	\$240,885.00
TOTAL	369,816	365,599	\$3,605,363.00	228,397	335,117	\$4,027,602.42	103,000	117,407	\$1,841,967.60
TOTAL PURCHASED GAS COSTS ALL PIPELINES	4 574 504	4 444 770	£40 907 504 05	4 470 050	4 400 470	\$ED 440 440 00	4 500 340	4 272 505	\$67 020 770 70
TO THE FUNCTINGS GAS COSTS ALL PIPELINES	4,574,501	4,441,772	\$40,807,521.05	4,179,650	4,166,470	\$50,442,142.92	4,500,319	4,373,525	\$67,938,778.70