### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

In the Matter of

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

CASE NO. 2006-00138

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

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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 November 2005 through January 2006 ("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 November 2005 through January 2006 and that is included in the three month filing made concurrently herewith pursuant to LG&E's Gas Supply Clause. Respectfully submitted,

Elizabeth L. Cocanougher 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 31st day of March, 2006, to the Office of the Attorney General, Office for Rate Intervention, P. O. Box 2000, Frankfort, Kentucky 40602-2000.

beth L. Cocanougher

#### LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM NOVEMBER 2005 THROUGH JANUARY 2006

DELIVERED BY TEXAS GAS TRANSMISSION, LLC COMMODITY AND VOLUMETRIC CHARGES:			NOVEMBER 2005			DECEMBER 2005			JANUARY 2006		
		NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	3	
NATURAL GAS S	UPPLIERS:										
1.	A	0	0	\$0.00	667,008	650,740	\$7,604,048.88	98,000	95,610	\$1,180,411.92	
2.	8	255,000	248,780	\$2,665,850.81	289,000	281,951	\$3,816,597.77	34,000	33,171	\$309,729.38	
3.	С	16,531	16,128	\$191,051.00	0	0	\$0.00	۵	Q	\$0.00	
4.	D	0	0	\$0.00	324,000	316,098	\$4,443,774.75	36,000	35,122	\$305,716.50	
5.	E	176,419	172,116	\$1,868,111.90	(25,418)	(24,799)	(\$333,102.89)	0	0	\$0.00	
6.	F	121,526	118,562	\$1,358,887.30	0	0	\$0.00	0	0	\$0.00	
7.	G	0	0	\$0.00	(50,000)	(48,780)	(\$533,200.00)	0	0	\$0.00	
8.	н	0	0	\$0.00	661,500	645,366	\$7,604,048.88	0	0	\$0.00	
9.		3,800	3,707	\$37,754.51	0	0	\$0.00	0	0	\$0.00	
10.	ť	0	0	\$0.00	0	0	\$0.00	9,639	9,404	\$89,600.00	
11.	к	289,000	281,951	\$2,999,365.31	(33,508)	(32,691)	\$57,910.97	17,000	16,585	\$158,027.52	
12.	E.	592,800	578,341	\$7,638,300.00	607,390	592,576	\$6,194,246.71	612,560	597,620	\$6,208,835.00	
13.	M	0	0	\$0.00	617,030	601,980	\$7,040,786,00	0	0	\$0.00	
14 .	N	38,556	37,616	\$380,000.00	0	0	\$0,00	0	Ō	\$0.00	
15 .	Ö	19.278	18,808	\$224,250.00	0	Ō	\$0.00	0	ō	\$0.00	
16.	P	152,003	148,296	\$1,640,889.50	(50,000)	(48,780)	(\$532,450.00)	0	0	\$0.00	
17.	Q	49,000	47,805	\$694,928,12	661,500	645,366	\$7,604,048.88	õ	0	\$0.00	
	-	1,713,913	1,672,110	\$19,699,388.45	3,668,502	3,579,027	\$42,966,709.95	807,199	787,512	\$8,252,320.32	
	VICE ("NNS") STORAGE:										
1. WITHDRAWALS		392,438	382,866	\$4,707,647.00	687,290	670,527	\$7,807,751.86	825,438	805,305	\$8,550,959.87	
2. INJECTIONS		(256,936)	(250,669)	(\$3,082,178.56)	(104,201)	(101,660)	(\$1,183,744.20)	(106,362)	(103,768)	(\$1,101,835.87	
3. ADJUSTMENTS		(12,614)	(8,808)	(\$177,608.90)	(77)	(981)	(\$923.69)	648	(4,009)	\$7,361.41	
4 . ADJUSTMENTS				\$98,049.28			\$0.00			\$0.00	
	5 . ADJUSTMENTS			\$0.00			\$0.00	······································		\$0.00	
NET NNS	STORAGE	122,888	123,389	\$1,545,908.82	583,012	567,886	\$6,623,083.97	719,724	697,528	\$7,456,485.41	
NATURAL GAS T	RANSPORTERS										
1. TEXAS GAS TRANSMISSION, LLC				\$96,486.80			\$208,235.91			\$71,745.55	
2 . ADJUSTMENTS		0	(23,467)	(\$740.39)	0	(11,573)	(\$10,439.48)	0	(29,422)	\$33.27	
3 ADJUSTMENTS		0	(20,401)	(\$244.80)	0	(11,010)	\$0.00	ñ	(20,422)	\$0.00	
TOTAL		1,836,801	1,772,032	\$95,501.61	4,251,514	4,135,340	\$197,796.43	1,526,923	1,455,618	\$71,778.82	
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TOTAL COMMO	DITY AND VOLUMETRIC CHARGES			\$21,340,798.88			\$49,787,590.35			\$15,780,584.55	
DEMAND AND FIXED	CHARGES:										
1. TEXAS GAS TRANSMISSION, LLC				\$2,745,379.20			\$2,839,946.94			\$2,839,946.94	
2 . ADJUSTMENTS				\$965.52			\$2,956.55			\$0.00	
3 . SUPPLY RESERVATION CHARGES				\$888,648,61			\$1,315,830.67			\$1,307,670,13	
4 . ADJUSTMENTS				\$0.00			(\$8,820.00)			\$20,235.04	
5 . CAPACITY REL	EASE CREDITS			\$0.00			\$0.00			\$0.00	
TOTAL DEMAND AND FIXED CHARGES				\$3,634,993.33			\$4,149,914.16			\$4,167,852.11	
TOTAL PURCHASED GAS COSTS TEXAS GAS TRANSMISSION, LLC			\$24,975,792.21			\$53,937,504.51			\$19,948,436.66		

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DELIVERED BY TENNESSEE GAS PIPELINE COMPANY	NOVEMBER 2005			DECEMBER 2005			JANUARY 2006		
COMMODITY AND VOLUMETRIC CHARGES: NET		MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$
NATURAL GAS SUPPLIERS:	·			······					
1. R	15,795	15,335	\$136,641.00	0	O	\$0.00	0	D	\$0.00
2. S	502,925	488,277	\$4,018,006.08	0	0	\$0.00	0	0	\$0.00
3. T	0	0	\$146,931.17	14,500	14,077	\$116,119.96	75,072	72,886	\$625,645.77
4. U	18,835	18,286	\$138,589.90	0	0	\$0.00	0	0	\$0.00
5. V	50,207	48,745	\$613,551.42	714,000	693,204	\$6,158,198.48	127,500	123,786	\$1,184,372.35
6. W	9,819	9,533	\$85,353.00	0	0	\$0.00	0	0	\$0.00
7. X	475,971	462,108	\$4,086,605.48	76,500	74,272	\$643,540.35	405,582	393,769	\$3,345,133.94
8. Y	0	0	\$0.00	406,000	394,175	\$3,501,792.56	72,500	70,388	\$673,480.45
9. Z	8,711	8,457	\$105,799.13	43,948	42,668	\$644,366.86	0	0	\$0.00
10. AA	8,963	8,702	\$59,305.03	0	0	\$0.00	0	0	\$0.00
	1,091,226	1,059,443	\$9,390,782.21	1,254,948	1,218,396	\$11,064,018.21	680,654	660,829	\$5,828,632.51
NATURAL GAS TRANSPORTERS:									
1 . TENNESSEE GAS PIPELINE COMPANY			\$19,095.50			\$21,961.59			\$11,911.45
2 . ADJUSTMENTS	(472)	(7,273)	(\$5,813.64)	3,820	(971)	\$34,888.11	(103)	(7,031)	(\$1,340.02)
3 . ADJUSTMENTS	0	0	(\$0.01)	0	0	(\$0.04)	0	0	\$0.00
4 . ADJUSTMENTS	0	0	(\$502.29)	0	0	\$0.00	0	0	\$0.00
TOTAL	1,090,754	1,052,170	\$12,780.56	1,258,768	1,217,425	\$56,849.66	680,551	653,798	\$10,571.43
TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$9,403,562.77			\$11,120,867.87			\$5,839,203.94
DEMAND AND FIXED CHARGES:									***** *** ***
1 . TENNESSEE GAS PIPELINE COMPANY			\$329,664.00			\$329,664.00			\$329,664.00
2 ADJUSTMENTS			\$0.00			\$0.00			\$0.00 \$468,275.74
3 . SUPPLY RESERVATION CHARGES 4 . ADJUSTMENTS			\$451,397.09			\$475,198.28			\$400,215.14 \$0.00
			\$0.00			\$0.00			•
5 . CAPACITY RELEASE CREDITS			\$0.00			\$0.00			\$0.00
TOTAL DEMAND AND FIXED CHARGES			\$781,061.09			\$804,862.28			\$797,939.74
TOTAL PURCHASED GAS COSTS - TENNESSEE GAS PIPELINE COMPANY			\$10,184,623.86			\$11,925,730.15			\$6,637,143.68
OTHER PURCHASES									
1 . PURCHASED FOR ELECTRIC DEPARTMENT									
ONEOK ENERGY SERVICES COMPANY, L.P.	5,000	4,878	\$47,250.00	8,000	7,805	\$113,950.00	8,000	7,805	\$79,300.00
TEXAS GAS TRANSMISSION, LLC	0	.,	(\$547.80)	0	0	\$0.00	0	0	\$0.00
ADJUSTMENTS	õ	(437)	\$0.00	ō	(20)	\$0.00	0	(98)	\$0.00
	5,000	4,441	\$46,702.20	8,000	7,785	\$113,950.00	8,000	7,707	\$79,300.00
2 . CASH-OUT OF CUSTOMER OVER-DELIVERIES	-1-40	14,984	\$102,319.64	4,530	71,937	\$656,233.99	-,	65,580	\$515,943.32
TOTAL	5,000	19,425	\$149,021.84	8,000	79,722	\$770,183.99	8,000	73,287	\$595,243.32
TOTAL PURCHASED GAS COSTS ALL PIPELINES	2,932,555	2,843,627	\$35,309,437.91	5,518,282	5,432,487	\$66,633,418.65	2,215,474	2,182,703	\$27,180,823.66

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