

Mark R. Kempic
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COMMISSION

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April 23, 2007

Beth O'Donnell,
Executive Director,
Kentucky Public Service Commission
P.O. Box 615,
211 Sower Boulevard,
Frankfort, Kentucky 40602-0615
Phone (502) 564-3940

Re: **Case No. 2007-00008**

Dear Ms. O'Donnell,

Enclosed for filing with the Commission in the above docket is the original and ten copies of the Petition of Columbia Gas of Kentucky, Inc. ("Columbia") for Confidential Treatment of Data Requested by the Commission.

Pursuant to 807 KAR 5:001 Section 7(2), attached to the original copy of the Petition, and filed under seal, is a copy of the subject data responses containing the confidential information identified by yellow highlighting. All other copies of this Petition include as the attachment the data responses with the confidential information redacted.

Also enclosed is an extra copy that contains the redacted text. Please return the extra copy containing the redacted text to me after it has been date-stamped by the Commission. Thank you for your assistance.

As always, if you have any questions, please call me at 724.416.6328 or e-mail me at mkempic@nisource.com.

Sincerely,



Mark Kempic

Enclosures

cc: Hon. Richard S. Taylor
Hon. Stephen B. Seiple

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF AN ADJUSTMENT)
OF GAS RATES OF COLUMBIA GAS) CASE NO. 2007-00008
OF KENTUCKY, INC.)

PETITION OF COLUMBIA GAS OF KENTUCKY, INC.
FOR CONFIDENTIAL TREATMENT OF DATA

Columbia Gas of Kentucky, Inc. (“Columbia”) has this same day served in the instant matter responses to the “First Data Request of the Attorney General to Columbia Gas of Kentucky, Inc.” served on Columbia on April 10, 2007. One part of one of Columbia’s 161 responses contains information that is confidential and proprietary to Columbia and as well as information of a personal nature. Specifically, Data Request No 80 part C seeks the name of a particular employee of the Columbia as well as specific information about his annual compensation and benefits.

Pursuant to 807 KAR 5:001, Section 7, Columbia is requesting confidential treatment for this portion of the response. Columbia provided redacted versions of this response to the parties and is willing to enter into protective agreements with parties to this case under which agreement Columbia will provide the parties with the confidential information. Attached to the original copy of this Petition, as Attachment A, is a copy of both responses with the confidential informa-

tion identified by yellow highlighting. All other copies of this Petition include as Attachment A, both responses with the confidential information obscured.

The specific salary information for the time period provided is non-public information, which if disclosed publicly would invade this individual employee's privacy. Columbia has never publicly released the information contained in this response and Columbia has taken all steps necessary to restrict this information and this response to a very limited number of employees working on this rate case.

This confidential salary information is not disclosed to the public, and is being provided only to the Commission in compliance with 807 KAR 5:001, Section 7. Kentucky's Revised Statutes provide a specific exemption from disclosure for such personal information.

In view of the foregoing considerations, the data should be classified as confidential, pursuant to KRS §§ 61.870 *et seq.*, on the following specific grounds:

(1) Individual employee salary information is exempt from disclosure pursuant to KRS § 61.878(1)(a) because it contains "information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy".

(2) All the information provided herewith is further exempt from disclosure pursuant to KRS 61.878(1)(1), which exempts "information the disclosure of which is prohibited or restricted or otherwise made confidential by enactment of the General Assembly." This is so in this case because the personal salary information constitutes information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy under the express language of 61.878(1)(a)

It is also kept confidential by Columbia, and is therefore “the subject of efforts that are reasonable under the circumstances to maintain its secrecy.”

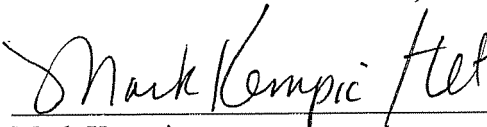
By granting this Petition and providing for confidential treatment of Columbia’s responses to this data request, the Commission and the parties can fully evaluate Columbia’s proposed application for an adjustment in rates, while maintaining the general confidentiality of such data, thereby balancing the public interest with the personal privacy concerns identified in KRS 61.878(1)(a).

WHEREFORE, Columbia respectfully requests that the Commission issue an order authorizing the confidential treatment of Columbia's response to this data request pursuant to 807 KAR 5:001, Section 7, for the reasons stated herein.

Dated at Canonsburg, Pennsylvania, this 23rd day of April 2007.

Respectfully submitted,

COLUMBIA GAS OF KENTUCKY, INC.

By: 
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Assistant General Counsel

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Attorneys for
COLUMBIA GAS OF KENTUCKY, INC.

ATTACHMENT A

**BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY
PSC CASE NO. 2007-00008
INFORMATION REQUESTED BY THE ATTORNEY GENERAL
DATED APRIL 10, 2007**

Question No. 80

With regard to the response to PSC-1-30, please provide the following information:

- a. Provide the official job description for the Director of Governmental Affairs.
- b. Provide a percentage breakout of the various activities, including lobbying, generally performed by the Director of Governmental Affairs.
- c. Provide a worksheet showing the total annual salary and other compensation expense and all of the fringe benefit expenses (list by component) and payroll taxes included in the pro forma test year O&M expenses for Brack Marquette.
- d. Explain the exact derivation of the dollar amount numbers shown in the response to PSC-1-30.

Response of Columbia Gas of Kentucky:

- a. The most recent job description is attached.
- b. During the test year the percentage of the incumbent's employment was approximately as follows:
 1. Lobbying – 7.69%
 2. Legislative research/analysis – 37.5%
 3. Economic development management/support – 16.99%
 4. General administrative duties -37.82%
- c. Columbia is seeking, pursuant to 807 KAR 5:001 Section 7, an order from the Commission declaring the salary and compensation material sought under this request is confidential.
- d. During the test year, the incumbent's expenses for lobbying activities occurred during times of personal contact with members of the General Assembly or Legislative Research Commission during the legislative session or committee meetings and other events, and included related travel, meals, supplies and other related expenses.

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COLUMBIA GAS OF KENTUCKY, INC. Assignment Profile

Title:	Director Governmental Affairs	Occupation Code:	
Location:	CKY	Status:	Exempt
Reports To:	President Columbia Gas of Kentucky	Supervises:	0
Date:	11-06-03		

Purpose: Primary external legislative and local public officials contact. Drives legislative strategies and provides recommendations, advice, and guidance on governmental actions and strategy, based on assessment of external environment in Kentucky. Champions CKY's legislative strategies to internal and external audiences, with the objective of achieving CKY's financial goals.

Key Results:

- Effective external relationships with state legislators and other key parties
- Strategic state legislative policy
- Achievement of CKY and legislative goals that support CKY's financial and strategic plan objectives
- Supports initiatives of CKY Director of Regulatory Policy

Essential Responsibilities:

- Act as primary legislative liaison between CKY, and the Kentucky Public Service Commission, the Kentucky Attorney General's Consumer Division, the Kentucky Legislature and Executive Branch, local governments and other stakeholders.
- Proactively drive successful outcomes to legislative initiatives.
- Support CKY Marketing/Sales and Operations initiatives.
- Provide an on going assessment of the legislative environment, including an evaluation of opportunities and exposures related to energy and general business issues in Kentucky.
- Coordinate and communicate global/federal legislative issues with Corporate Services .
- Provides legislative and executive branch status report to Political Action Committee.

Key Work Experiences/Education:

Required for Selection:

- Extensive governmental and/or financial experience.

Preferred for Selection:

- Bachelor's degree or higher in accounting, finance, economics, political science or equivalent experience.
- Experience with regulated utility in management of external affairs.
- Experience with the gas industry.
- Familiarity with Kentucky government, political and business environments.
- Strong interpersonal skills and strong negotiation skills
- Relationships/contacts with Kentucky public officials, key regulatory and legislative staff.

Technical/Functional Competencies:

Required for Selection:

▪

Preferred for Selection:

- Knowledge of rate theory and application.
- Knowledge of legislative process.
- Witness training.

General/Transferable Competencies:

Applicable Core Competency Models:

- Professional/management models

Additional Assignment-Specific Competencies:

Required for Selection:

- Act with integrity
- Financial acumen
- Seasoned judgment
- Visionary thinking
- Influencing and negotiating
- Team building

CERTIFICATE OF SERVICE

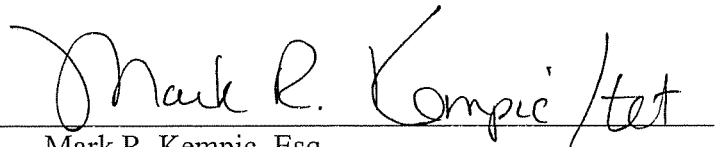
I hereby certify that a copy of the foregoing responses of Columbia Gas of Kentucky, Inc. were served via either personal hand delivery, First Class U.S. Mail postage prepaid or overnight mail on the following parties, all on this 23rd day of April, 2007.

Hon. Dennis G. Howard, II
Hon. Lawrence W. Cook
Assistant Attorney General
Office of the Attorney General
Utility and Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204

Matthew Malone
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The Equus Building
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Attorney for Interstate Gas Supply, Inc.

Hon. David J. Barberie
Hon. Leslye M. Bowman
Lexington-Fayette Urban
County Government
Department of Law
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Hon. David F. Boehm
Boehm, Kurtz & Lowry
36 E. Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Attorney for Kentucky Industrial Utility Customers



Mark R. Kempic, Esq.
Attorney for Columbia Gas of Kentucky, Inc.

CERTIFICATE OF SERVICE

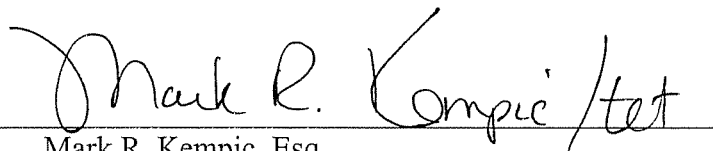
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