## COMMONWEALTH OF KENTUCKY RECEIVED

MAR 3 1 2008

PUBLIC SERVICE COMMISSION

In the Matter of

THE PETITION OF LOUISVILLE GAS AND	)		
ELECTRIC COMPANY FOR CONFIDENTIAL	)	Anaa Amus	-1
TREATMENT OF CERTAIN INFORMATION	)	CASE NO. 2008-0011	1
CONTAINED IN ITS QUARTERLY GAS	)		
SUPPLY CLAUSE FILING	)		

BEFORE THE PUBLIC SERVICE COMMISSION

## 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 November 2007 through January 2008 ("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 that, if disclosed, 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 vis-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, and the Commission has granted those requests.
- 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 2007 through January 2008 and that is included in the three month filing made concurrently herewith pursuant to LG&E's Gas Supply Clause.

## Respectfully submitted,

J. Gregory Cornett

Senior Corporate Attorney

E.ON U.S. Services, Inc.

220 West Main Street

P. O. Box 32010

Louisville, Kentucky 40232

(502) 627-2756

**Counsel for Louisville Gas and Electric Company** 

## **CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing instrument was shipped via United Parcel Service on the <u>31</u> day of March, 2008, to the Office of the Attorney General, Office for Rate Intervention, 1024 Capital Center Drive, Frankfort, Kentucky 40601-8204.

J. Gregory Cornett

LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM NOVEMBER 2007 THROUGH JANUARY 2008

DELIVERED BY TENNESSEE GAS PIPELINE COMPANY NO		OVEMBER 200	7	DI	ECEMBER 2007	7	JANUARY 2008			
COMMODITY AND VOLUMETRIC CHARGES:	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	NET MMBTU	MCF	\$	
NATURAL GAS SUPPLIERS:				****			<u> </u>			
1. 0	0	0	\$0.00	0	Ð	\$0.00	0	0	\$0.00	
2. P	53,258	51,707	\$395,899.80	449,500	436,408	\$3,151,827.35	449,500	436,408	\$3,256,098.33	
3. Q	156,486	151,928	\$994,000.00	. 0	0	\$0.00	0	0	\$0.00	
4 . R	320,836	311,491	\$2,049,286.20	9	0	\$0.00	0	0	\$0.00	
5. S	104,324	101,285	\$655,725.00	0	0	\$0.00	0	0	\$0.00	
6. T	331,500	321 845	\$2,464,193.55	790,500	767,476	\$5,542,755,05	790,500	767,476	\$5,726,124.39	
7 . U	9,947	9,657	\$61,879.20	0	0	\$0.00	0	0	\$0.00	
	976,351	947,913	\$6,620,983.75	1,240,000	1,203,884	\$8,694,582.40	1,240,000	1,203,884	\$8,982,222.72	
NATURAL GAS TRANSPORTERS:										
1 . TENNESSEE GAS PIPELINE COMPANY			\$17,086.14			\$21,700.00			\$21,700.00	
2 . ADJUSTMENTS	(481)	1,094	(\$3,888.84)	(274)	3,668	(\$1,861.91)	(1,067)	3,531	(\$7,650.81)	
3 . ADJUSTMENTS	0	0	\$0.00	0	0	\$0.02	0	0	\$0.00	
4 . ADJUSTMENTS	0	0	\$0.00	0	0	\$0.00	0	0	\$0.00	
TOTAL	975,870	949,007	\$13,197.30	1,239,726	1,207,552	\$19,838,11	1,238,933	1,207,415	\$14,049.19	
TOTAL COMMODITY AND VOLUMETRIC CHARGES			\$6,634,181.05			\$8,714,420.51			\$8,996,271.91	
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 \$796,127.53 \$0.00			\$329,664.00 \$0.00 \$852,297.57 \$0.00			\$329,664.00 \$0.00 \$853,968.47 \$0.00	
TOTAL DEMAND AND FIXED CHARGES			\$1,125,791.53			\$1,181,961.57			\$1,183,632.47	
TOTAL PURCHASED GAS COSTS TENNESSEE GAS PIPELINE	COMPANY		\$7,759,972.58			\$9,896,382.08			\$10,179,904.38	
OTHER PURCHASES  1. PURCHASED FOR ELECTRIC DEPARTMENT TEXAS GAS TRANSMISSION, LLC	0	0	\$0.00	0	0	\$0.00	0		\$0.00	
V	ō	Ō	\$0.00	0	0	\$0.00	17,080	16,585	\$148,750.00	
ADJUSTMENTS	ő	55	\$0.00	0	Ö	\$0.00	0	0	\$0.00	
	0	55	\$0.00	0	0	\$0.00	17,000	16,585	\$148,750.00	
2 . CASH-OUT OF CUSTOMER OVER-DELIVERIES		4,427	\$30,572.09		30,867	\$216,621.87		19,802	\$152,863.44	
TOTAL	0	4,482	\$30,572.09	0	30,867	\$216,621.87	17,000	36,387	\$301,613.44	
TOTAL PURCHASED GAS COSTS - ALL PIPELINES	3,115,205	3,043,907	\$25,955,545.10	3,131,886	3,087,783	\$27,502,731.17	4,084,149	4,004,398	\$34,777,415.76	

LOUISVILLE GAS AND ELECTRIC COMPANY SUMMARY OF GAS PURCHASES AND COSTS BY SUPPLIER FOR THE 3 MONTH PERIOD FROM NOVEMBER 2007 THROUGH JANUARY 2008

FOR THE 3 MONTH PERIOD	ASES AND COSTS BY SUPPLIER FROM NOVEMBER 2007 THROUGH JA	GAOWLL SOOO			ner	CMDER 2007			NUARY 2008	
DELIVERED BY TEXAS GAS TRANSMISSION, LLC		NOVEMBER 2007			DECEMBER 2007  NET MMBTU MCF \$			NET MMBTU	MCF	\$
DELIVERED BY TEXAS GAS	RANSMISSION, LLC	NET MMBTU	MCF	\$ .	NEI MIMBIO					\$395,493.89
COMMODITY AND VOLUME	TRIC CHARGES.				440.405	109,751	\$837,225.96	51,000	49,756	\$5,556,095.28
NATURAL GAS SUPPL	IERS:	374,000	364,878	\$2,689,091.43	112,495	143,415	\$1,076,885.76	768,473	749,730	\$5,556,085.26
1.	Ą	98,000	95,610	\$719,940.48	147,000	(45,410	\$0.00	0	0	
2 .	B	3,439	3,355	\$26,010.00	0	16,585	\$129,102.73	(201,080)	(196,176)	(\$1,621,020.07)
3.	С	0	0	\$0.00	17,000	247,912	\$1,818,885,63	196,000	191,220	\$1,629,931.53
4 .	D	ű	0	\$0.00	254,110	247,912 D	\$0.00	(469,284)	(457,838)	(\$3,682,064.72)
5.	E	118,382	115,495	\$839,250.00	0	-	\$717,923,84	492,124	480,121	\$3,584,577.60
6.	F	1 10,002	0	\$0.00	98,000	95,610	\$0.00	0	0	\$0.00
7.	G	53,793	52,481	\$367,020.00	0	0	\$0.00	100,540	880,88	\$739,704.00
8.	H	55,153 N	02,401	\$0.00	0	0		622,170	606,995	\$4,417,035.00
9.	1	•	586,980	\$4,290,281.03	610,347	595,460	\$4,339,456.88	492,890	480,868	\$3,584,577.60
	j	601,655	008,000	\$0.00	0	0	\$0.00	432,000	0	\$0.00
10 .	к	0	-	\$136,200.00	0	0	\$0.00	Ô	0	\$0.00
11 .	ť	19,106	18,640	\$850,900.00	0	0	\$0.00	(75,624)	(73,780)	(\$586,464.12)
12 .	M	125,517	122,455	\$1,050,038.57	0	0	\$0.00		1,928,984	\$14,017,865.99
13 .	N	146,775	143,195	\$10,968,731.51	1,238,952	1,208,733	\$8,919,480.80	1,977,209	1,020,001	• • • • • • • • • • • • • • • • • • • •
14 .	14	1,540,667	1,503,089	\$10,900,731.31	1,200,0	•				
									892,894	\$6,810,030.73
	majon excesses				724,467	706,797	\$5,210,728.90	915,216		(\$477,698.34)
NO-NOTICE SERVICE	= (1882) 21010-10r.	710,892	693,553	\$5,073,778.38	(71,483)	(69,740)	(\$514,141.48)	(64,199)	(62,633)	(\$71.93)
1 . WITHDRAWALS	•	(112,192)	(109,456)	(\$800,736.74)	224	1,168	\$1,598.73	(10)	460 0	\$0.00
2 . INJECTIONS		(32)	(19)	(\$207.00)	0	0	\$0.00	C	U	\$0.00
3 . ADJUSTMENTS		Ġ	0	(\$17.44)	U	•	\$0.00			\$6,332,260,46
4 . ADJUSTMENTS				\$0.00		638,225	\$4,698,186.15	851,007	830,721	\$6,332,200.40
5 . ADJUSTMENTS		598,668	584,078	\$4,272,817.20	653,208	030,220	<b>4</b> 44===,-==			
NET NNS STO	TRAGE	224,422								040 44
							\$92,911.26			\$141,948.14
NATURAL GAS TRAN	NSPORTERS:			\$110,876.22		2 400	\$12.39	0	891	(\$0.57)
1. TEXAS GAS TRANS	SMISSION, ELC	0	3,251	(\$1.60)	0	2,406	\$0.00	0	0	\$0,00
2 ADJUSTMENTS		Ů	n n	\$0.00	0		\$92,923.65	2,828,216	2,760,596	\$141,947.57
3 ADJUSTMENTS		2,139,335	2,090,418	\$110,874.62	1,892,160	1,849,364	\$32,323.00			
TOTAL		2,139,333	2,000,770	•			-40 T40 C00 C0			\$20,492,074.02
		ž.		\$15,352,423.33			\$13,710,590.60			
TOTAL COMMODIT	TY AND VOLUMETRIC CHARGES			4(0,0,						
101AL COMMODIL										\$2,654,489.70
DEMAND AND FIXED CH	ARGES:			\$2,568,861.00			\$2,654,489.70			\$0.00
1 TEXAS GAS TRAN	SMISSION IIC			\$2,000,001.00			\$0.00			\$1,149,334.22
1 . IEAAS GAS TRAIN	3,41,50,011, 2			\$263,516.10			\$1,032,396.92			\$0.00
2 ADJUSTMENTS	ATION CHADGES						\$0.00			\$0.00
3 . SUPPLY RESERVA	ATION CHARGES			\$0.00			(\$7,750.00)			
4 . ADJUSTMENTS				(\$19,800.00)						\$3,803,823.92
5 . CAPACITY RELEA	SE CREDITS						\$3,679,136.62			\$3,800,020.0.
	TO THE CLARKE			\$2,812,577.10						204 205 897 Q
TOTAL DEMAND A	AND FIXED CHARGES			•			\$17,389,727.22			\$24,295,897.94
	ED GAS COSTS — TEXAS GAS TRANSA	HERION LLC		\$18,165,000.43						
	EN MAC CACTS TEXAS INAS IMANDA	**************************************								