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January 22, 2015

Stephen B. Seiple, Esq.
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-0117

Re: Columbia Gas of Kentucky, Inc.
Petition for Confidential Protection received December 2, 2014
PSC Reference Case No. 2004-00462¹

Dear Mr. Seiple:

The Public Service Commission has received your Petition for Confidential Treatment filed on December 2, 2014, on behalf of Columbia Gas of Kentucky, Inc. ("Columbia"), to protect certain information that is contained in its Final Hedging Report for the 2013-2014 heating season ("Final Report"), pursuant to 807 KAR 5:001, Section [13].² As Columbia's request is being addressed outside of a case, 807 KAR 5:001, Section 13(3) provides that the Commission's "executive director, as official custodian of the commission's records, shall determine if the material falls within the exclusions from disclosure requirements established in KRS 61.878 and the time period for which the material should be considered as confidential and shall advise the requestor of the determination by letter." This letter constitutes my determination of your request.

The information that Columbia seeks to have treated as confidential is included in its Final Report and contains sensitive Trigger Price information, which includes confidential information about Columbia's hedging strategies (including the prices Columbia would likely pay for hedging contracts under various market conditions). Columbia states that disclosure of this information would damage Columbia's

¹ Although the petition has been filed under Case No. 2004-00462, the cover letter that accompanied the petition also references Case No. 2010-00365, *Application of Columbia Gas of Kentucky, Inc. to Extend its Gas Price Hedging Plan* (Ky. PSC Nov. 23, 2010), in which case the Commission extended Columbia's hedging plan through March 31, 2015.

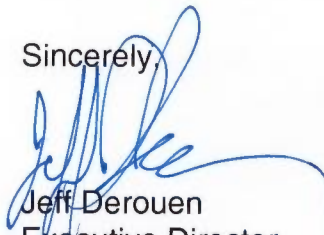
² Columbia Gas of Kentucky, Inc.'s ("Columbia") petition for confidential treatment was brought pursuant to 807 KAR 5:001, Section 7. 807 KAR 5:001 was revised in 2013 and the correct citation is now 807 KAR 5:001, Section 13.

competitive position and would permit an unfair commercial advantage to Columbia's competitors and to financial traders with whom Columbia might be negotiating with for the purchase of financial instruments. Columbia also states that Trigger Price information constitutes "data" which derives independent economic value by not being generally known to other persons. Finally, Columbia states that the trigger price data constitutes a trade secret under the two prong test of KRS 365.880(4)(a) and (b), and its disclosure is either prohibited or restricted by the express provisions of KRS 365.880 through 365.894.

Based on a review of the information and pursuant to KRS 61.878 and 807 KAR 5:001, Section 13, the Commission has determined that disclosure of the information requested to be held confidential would permit unfair commercial advantage to Atmos's competitors. Therefore, this information meets the criteria for confidential protection and will be maintained as a non-public part of the Commission's Post Case Referenced Correspondence file for an indefinite period.

The procedure for usage of confidential materials during formal proceedings may be found at 807 KAR 5:001, Section 13(9). If the information becomes publicly available or no longer warrants confidential treatment, Atmos is required by 807 KAR 5:001, Section 13(10), to inform the Commission so that the information may be placed in the public record.

Sincerely,



Jeff Derouen
Executive Director