

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR AN ADJUSTMENT OF ITS)
ELECTRIC RATES) CASE NO. 2012-00221**

**PETITION OF KENTUCKY UTILITIES COMPANY
FOR CONFIDENTIAL PROTECTION**

Kentucky Utilities Company (“KU”) hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 7 and KRS 61.878(1) to grant confidential protection for the items described herein, which KU seeks to provide in response to the Commission’s Second Requests for Information. The specific Requests for Information for which KU seeks confidential protection are Request Nos. 38 and 75. In support of this Petition, KU states as follows:

1. On June 29, 2012, KU filed with the Commission an application proposing changes in its base rate tariffs. On July 31, 2012, the Commission issued its Second Requests for Information to KU.

Confidential or Proprietary Commercial Information (KRS 61.878(1)(c))

1. 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 the material is of a kind generally recognized to be confidential or proprietary, and the disclosure of which would permit an unfair commercial advantage to competitors of the party seeking confidentiality.

2. Request No. 38 asks KU to provide a copy of supplier contracts with certain third-party vendors. The contracts contain commercially sensitive information that is considered

confidential by KU and its counterparties and falls under the protection of the Open Records Act. Allowing vendors to review KU's contracts will place KU at a competitive disadvantage in the market. Public disclosure would allow vendors to submit bids and terms based upon past practices. Counterparties could, therefore, submit bids and terms that are only slightly better than those given to KU in the past when additional cost savings or protections should be possible. Additionally, the public disclosure of specific information about the third parties KU does business with will discourage vendors from doing business with KU as the terms and prices agreed to will be publicly available to the vendors' own customers and competitors.

Confidential Personal Information (KRS 61.878(1)(a))

3. Request No. 75 asks KU to provide electronic copies of the exhibits to the testimony of Robert Conroy. The request further asks that formulas be left "intact and unprotected and with all columns and rows accessible." KU is supplying such information, but seeks confidential protection under KRS 61.878(1)(a) for private, customer-identifying information (i.e., customer names and account numbers) contained in their responses. Certain of Mr. Conroy's exhibits dealing with the billing determinants and cost-of-service studies include customer information. KU believes protecting such information is particularly important in this time of ever-increasing identity theft.

4. The information for which KU is seeking confidential treatment is not known outside of the Company, and it is not disseminated within KU except to those employees with a legitimate business need to know the information.

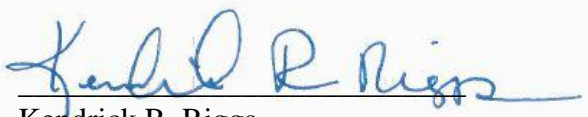
5. To comply with the provisions of the Commission's June 22, 2012 Order in this proceeding concerning electronic filing procedures, KU will timely file with the Commission one copy of the Confidential Information highlighted in paper medium and one copy of the

Confidential Information highlighted in electronic medium on a DVD, as well as a copy of the redacted material.

WHEREFORE, Kentucky Utilities Company respectfully requests that the Commission grant confidential protection for the information described herein.

Dated: August 14, 2012

Respectfully submitted,



Kendrick R. Riggs

Kendrick R. Riggs
W. Duncan Crosby III
Barry L. Dunn
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000

Allyson K. Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088

Robert M. Watt III
Lindsey W. Ingram III
Monica H. Braun
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507-1801

Counsel for Kentucky Utilities Company

CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Kentucky Utilities Company's August 14, 2012 electronic filing of the Petition for Confidential Protection is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on August 14, 2012; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and two copies in paper medium of the Petition are being hand delivered to the Commission on August 14, 2012.



Gerald R. Riess
Counsel for Kentucky Utilities Company