

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

|                                   |   |                            |
|-----------------------------------|---|----------------------------|
| <b>APPLICATION OF KENTUCKY</b>    | ) |                            |
| <b>UTILITIES COMPANY FOR AN</b>   | ) | <b>CASE NO. 2012-00221</b> |
| <b>ADJUSTMENT OF ITS ELECTRIC</b> | ) |                            |
| <b>RATES</b>                      | ) |                            |

**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 Kentucky School Boards Association’s (“KSBA”) Supplemental Data Requests. The specific Request for Information for which KU seeks confidential protection is: 1.

1. On June 29, 2012, KU filed with the Commission an application proposing changes in its base rate tariffs. On July 31, 2012, KSBA issued Data Requests to KU and on August 28, 2012, KSBA issued Supplemental Data Requests to KU.

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

2. Request No. 1 asks KU to “provide a list of all Rate AES customer accounts that exceed 50 kw including account name and average kw.” In response, KU is providing an attachment that lists customers’ names, account numbers, and usage information. This information is private and personal customer-identifying information that KU believes should be held confidential as protecting such information is particularly important in this time of ever-increasing identity theft. In order to protect the customers’ privacy, the names and account numbers have been redacted from the public version.

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

4. KU will disclose the confidential information, pursuant to a confidentiality agreement, to intervenors with a legitimate interest in this information and as required by the Commission.

5. If the Commission disagrees with this request for confidential protection, however, it must hold an evidentiary hearing (a) to protect KU's due process rights and (b) to supply with the Commission with a complete record to enable it to reach a decision with regard to this matter.<sup>1</sup>

6. To satisfy 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 paper copy of the Confidential Information in paper medium and one copy of the Confidential Information in electronic medium on a DVD or CD-ROM. The Confidential Information is highlighted in yellow in the confidential version of the attachment. KU has also provided a copy of the information with the confidential information redacted, as well.

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

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<sup>1</sup> *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, 642 S.W.2d 591, 592-94 (Ky. App. 1982).

Dated: September 12, 2012

Respectfully submitted,



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**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 September 12, 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 September 12, 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 September 12, 2012.



*Counsel for Kentucky Utilities Company*