

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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 Staff’s Third Requests for Information. The specific Requests for Information for which KU seeks confidential protection are: 18 and 26(c).

1. On June 29, 2012, KU filed with the Commission an application proposing changes in its base rate tariffs. On July 31, 2012, Commission Staff issued its Second Request for Information to KU and on August 28, 2012, the Commission Staff issued its Third Request for Information to KU.

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

2. Request No. 18 asks KU to provide a copy of two certain contracts it has with its customers. Within one of the contracts is an account number for the customer. The account number is private, customer-identifying information. KU believes protecting such information is particularly important in this time of ever-increasing identity theft.

3. Request No. 26(c) asks KU to provide the identify of a specific customer referenced in KU’s Response to No. 93(d)(2). In response KU is supplying a customer’s name,

which is personal and private, customer-identifying 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 KU, and it is not disseminated within KU except to those employees with a legitimate business need to know the information.

5. 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.

6. 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.¹

7. 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 CD-ROM or DVD. A redacted copy of the attachment to Request No. 18 has been provided, and the confidential account number is highlighted in yellow in the confidential version. Because the attachment to Request No. 26(c) is confidential in its entirety, no public version with redactions has been provided. Instead, the public version contains a slip sheet noting the entire attachment is confidential. In the confidential version, the one-page attachment has the word "CONFIDENTIAL" in the header to

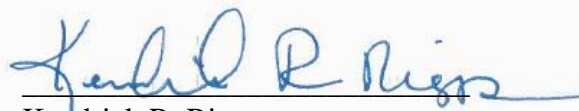
¹ *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, 642 S.W.2d 591, 592-94 (Ky. App. 1982).

comply with the Commission's June 22, 2012 Order of designating the confidential information by "reasonable means."

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

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