

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC AND GAS)	CASE NO. 2012-00222
RATES, A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY,)	
APPROVAL OF OWNERSHIP OF GAS)	
SERVICE LINES AND RISERS, AND A GAS)	
LINE SURCHARGE)	

PETITION OF LOUISVILLE GAS AND ELECTRIC COMPANY
FOR CONFIDENTIAL PROTECTION

Louisville Gas and Electric Company (“LG&E”) 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 LG&E seeks to provide in response to the Commission’s Second Requests for Information. The specific Requests for Information for which LG&E seeks confidential protection are Request Nos. 54 and 108. In support of this Petition, LG&E states as follows:

1. On June 29, 2012, LG&E 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 LG&E.

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. 54 asks LG&E to provide a copy of supplier contracts with certain third-party vendors. The contracts contain commercially sensitive information that is considered confidential by LG&E and its counterparties and falls under the protection of the Open Records Act. Allowing vendors to review LG&E's contracts will place LG&E 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 LG&E in the past when additional cost savings or protections should be possible. Additionally, the public disclosure of specific information about the third parties LG&E does business with will discourage vendors from doing business with LG&E 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. 108 asks LG&E 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." LG&E 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. LG&E believes protecting such information is particularly important in this time of ever-increasing identity theft.

4. The information for which LG&E is seeking confidential treatment is not known outside of the Company, and it is not disseminated within LG&E 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, LG&E 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, Louisville Gas and Electric Company respectfully requests that the Commission grant confidential protection for the information described herein.

Dated: August 14, 2012

Respectfully submitted,



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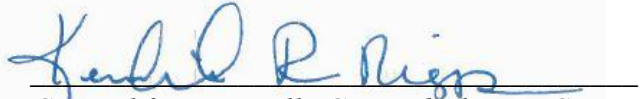
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CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Louisville Gas and Electric 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.



Counsel for Louisville Gas and Electric Company