

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

**In the Matter of:**

<b>AN EXAMINATION OF THE APPLICATION OF</b>	)	
<b>THE FUEL ADJUSTMENT CLAUSE OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS &amp; ELECTRIC COMPANY</b>	)	<b>2014-00228</b>
<b>FROM NOVEMBER 1, 2013 THROUGH APRIL</b>	)	
<b>30, 2014</b>	)	
<b>AN EXAMINATION OF THE APPLICATION</b>	)	
<b>OF THE FUEL ADJUSTMENT CLAUSE OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2014-00453</b>
<b>FROM NOVEMBER 1, 2011 THROUGH</b>	)	
<b>OCTOBER 31, 2014</b>	)	

**PETITION OF LOUISVILLE GAS AND ELECTRIC COMPANY**  
**FOR CONFIDENTIAL PROTECTION**

Louisville Gas and Electric Company (“LG&E”), pursuant to 807 KAR 5:001, Section 13, respectfully petitions the Commission to classify as confidential and protect from public disclosure certain information referenced by LG&E during the Informal Conference held on March 26, 2015. The information for which LG&E requests confidential treatment (detailed hourly examples of the after-the-fact billing (“AFB”) process) (“Confidential Information”) was requested by Commission Staff to be filed in the record with the Commission. In support of this Motion, LG&E notes that the Commission has treated this type of information as confidential in LG&E’s recent six-month and two-year fuel adjustment clause review proceedings.

In further support of this Petition, LG&E states as follows:

1. Under the Kentucky Open Records Act, the Commission is entitled to withhold from public disclosure information confidentially disclosed to it to the extent that open disclosure

would permit an unfair commercial advantage to competitors of the entity disclosing the information to the Commission. See KRS 61.878(1)(c). Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. Public disclosure of the unit fuel costs and order of dispatch contained in the detailed hourly AFB examples would damage LG&E's competitive position and business interests. Granting public access to the information provided would necessarily impair LG&E's ability to negotiate with prospective contractors and vendors -- now equipped to manipulate the price of fuel bid to LG&E to maximize revenues -- and would likewise arm LG&E's competitors with information with which they could erode LG&E's competitive position in the wholesale power market. As noted above, the Commission has treated such information as confidential in the past.

3. The information for which LG&E is seeking confidential treatment is not known outside of LG&E, is not disseminated within LG&E except to those employees with a legitimate business need to know and act upon the information, and is generally recognized as confidential and proprietary information in the energy industry.

4. LG&E does not object to limited disclosure of the confidential information described herein, pursuant to an acceptable protective agreement, to intervenors with legitimate interests in reviewing the same for the purpose of participating in this case.

5. In accordance with the provisions of 807 KAR 5:001, Section 13, LG&E is filing with the Commission one copy of the Confidential Information on a compact disk.

**WHEREFORE**, Louisville Gas and Electric Company respectfully requests the Commission to grant confidential protection to the detailed hourly AFB examples referenced during the Informal Conference held on March 26, 2015 and subsequently filed in these proceedings for a period of five years from the date of filing.

Dated: March 27, 2015

Respectfully submitted,



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