

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. 2016-00371
RATES AND FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	

PETITION OF LOUISVILLE GAS AND ELECTRIC COMPANY
FOR CONFIDENTIAL PROTECTION

Louisville Gas and Electric Company (“LG&E” or the “Company”) hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 13 and KRS 61.878(1) to grant confidential protection for the item described herein, which LG&E seeks to provide in connection with the Rebuttal Testimony of W. Steven Seelye. In support of this Petition, LG&E states as follows:

1. On March 17, 2017, LG&E propounded Data Requests on JBS Swift & Co. (“JBS Swift”). In Question 1, LG&E asked JBS Swift to provide a copy of all feasibility studies and costs-benefit analyses, preliminary or otherwise, performed by or on behalf of JBS Swift of the cogeneration project being evaluated by JBS Swift. JBS Swift provided a response on March 31, 2017 and filed on the same date a Petition for Confidential Protection seeking confidential treatment of Question 1. In its Petition, JBS Swift sought protection of information provided in response to Question 1 because “public disclosure of the information could harm JBS Swift by providing competing companies an opportunity to understand the company’s core operations regarding its equipment and associated energy consumption.”¹

¹ JBS Swift Petition at 2 (Ky. PSC Mar. 31, 2017).

2. In the Rebuttal Testimony of W. Steven Seelye, Mr. Seelye references and discusses the document for which JBS Swift sought confidential protection on March 31, 2017. Because JBS Swift sought confidential protection of this document, LG&E also requests confidential protection of the portions of Mr. Seelye's testimony that reference and discuss the document.

3. In consultation with JBS Swift's counsel, LG&E will disclose the confidential information as requested by intervenors who have entered into a confidentiality agreement with JBS Swift, and as required by the Commission.

4. Unless otherwise noticed, in compliance with 807 KAR 5:001, Sections 8(3) and 13(2)(e), LG&E is filing with the Commission one paper copy that identifies by highlighting or other means the information for which confidential protection is sought and one electronic copy with the same information obscured.

5. Consistent with JBS Swift's request, LG&E requests that confidential protection be granted for five years.

WHEREFORE, Louisville Gas and Electric Company respectfully requests that the Commission grant confidential protection for the information described herein.

Dated: April 10, 2017

Respectfully submitted,



Kendrick R. Riggs
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
Fax: (502) 627-8722
kendrick.riggs@skofirm.com

Allyson K. Sturgeon
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
allyson.sturgeon@lge-ku.com

Counsel for Louisville Gas and Electric Company

CERTIFICATE OF COMPLIANCE

This is to certify that Louisville Gas and Electric Company's April 10, 2017 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 April 10, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium of the Petition and an unobscured copy of the material for which confidentiality is sought sealed in an opaque envelope are being hand delivered to the Commission on April 10, 2017.


Allison K. Sturgeon
Counsel for Louisville Gas and Electric Company