

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SANCTUARY CHURCH)	
)	
COMPLAINANT)	
V.)	CASE NO. 2018-00181
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

* * * * *

**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)(a) to grant confidential protection for the items described herein, which LG&E has provided in support of its Responses to Question No. 5 of the Commission Staff’s First Request for Information dated August 27, 2018 and to Question No. 1 of Sanctuary Church. In support of this Petition, LG&E states as follows:

1. The Kentucky Open Records Act exempts from disclosure certain information of a personal nature where public disclosure would constitute a clearly unwarranted invasion of personal privacy. KRS 61.878(1)(a).
2. In its Response to Question No. 5 of the Commission Staff’s data requests, LG&E attached copies of the Sojourn Church’s utility bills. This information contains

the customer's detailed account and usage information and merits confidential protection because LG&E believes that revealing this information in the public record, when this customer is not a party to this proceeding, could result in an unwarranted invasion of personal privacy.

3. If the Commission disagrees with this request for confidential protection, however, it must hold an evidentiary hearing (a) to protect due process rights and (b) to supply the Commission with a complete record to enable it to reach a decision with regard to this matter. Utility Regulatory Commission v. Kentucky Water Service Company, Inc., Ky. App., 642 S.W.2d 591, 592-94 (1982).

4. LG&E does not believe that it should disclose the confidential documents, even pursuant to a protective agreement, to the Complainant. In accordance with the provisions of 807 KAR 5:001 Section 7, LG&E herewith files with the Commission one copy of the above-discussed documents with the confidential information highlighted and ten (10) copies of its response with the confidential information redacted.

WHEREFORE, Louisville Gas and Electric Company respectfully requests that the Commission grant confidential protection for the information at issue for an indefinite period of time, or in the alternative, schedule an evidentiary hearing on all factual issues while maintaining the confidentiality of the information pending the outcome of the hearing.

Dated: September 10, 2018

Respectfully submitted,



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Company

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Louisville Gas and Electric Company's September 10, 2018 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing was transmitted to the Commission on September 10, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and ten copies in paper medium of the filing are being delivered to the Commission by September 12, 2018.



Counsel for Louisville Gas and Electric
Company