

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

**In the Matter of:**

**ELECTRONIC EXAMINATION OF THE            )  
GAS SUPPLY CLAUSE OF LOUISVILLE        ) CASE NO. 2018-00302  
GAS AND ELECTRIC COMPANY                 )**

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

Louisville Gas and Electric Company (“LG&E” or the "Company"), pursuant to 807 KAR 5:001, Section 13, respectfully petitions the Commission to classify as confidential and protect from public disclosure certain information provided by the Company in its responses to Information Requested in Appendix B of the Kentucky Public Service Commission’s ("Commission") Order of July 30, 2018. The Company requests confidential protection for certain information ("Confidential Information") provided in response to Question Nos. 2, 8 and 9. In support of this Petition, the Company 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 Confidential Information identified herein would, in fact, prompt such a result for the reasons set forth below. Included in the Confidential Information LG&E is providing on yellow paper a copy of all base forms of agreements and related contractual documentation and terms, Annual Supply Statistics, Transaction Summary and Nomination Schedules (Response to Question No. 2); Bid documentation for gas commodity supply solicitations (Response to Question No. 8); and the

Company's 2017 Annual Gas Supply Plan (including 2017 bid documentation) and 2017 Summer Purchase Plan Analysis (Response to Question No. 9).

2. 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.

3. The information for which LG&E is seeking confidential treatment contains sensitive commercial information, the disclosure of which would injure LG&E's ability to negotiate future gas supply contracts at advantageous prices and, thereby, minimize the price of natural gas to its customers, and would unfairly advantage LG&E's competitors for both gas supplies and retail gas load. Any impairment of its ability to obtain the most advantageous price possible from natural gas producers and marketers will necessarily erode LG&E's competitive position vis-a-vis other energy suppliers that compete in LG&E's service territory, as well as other LDCs with whom LG&E competes for new and relocating industrial customers. Among other things, this sensitive information identifies LG&E's natural gas suppliers. Maintaining confidential treatment of this information will prevent other parties from obtaining the sensitive information which LG&E seeks to protect from disclosure.

4. Disclosure of this information will damage LG&E's competitive position and business interest in two ways. First, it will allow LG&E's competitors to know the unit price and overall cost of the gas LG&E is purchasing from each supplier. This information is valuable to LG&E's competitors because it can alert them to the identity of LG&E's low cost suppliers, and if those supply agreements are more favorable than theirs, they can attempt to outbid LG&E for those suppliers. This would raise prices to LG&E which would hurt its competitive position and

harm its customers. Second, it will provide competitors of LG&E's suppliers with information which will enable future gas bidding to be manipulated to the competitors' advantage and to the detriment of LG&E and its customers. Instead of giving its best price in a bid, a gas supply competitor with knowledge of the recent pricing practices of LG&E's other suppliers could adjust its bid so that it just beats other bidders' prices or other terms. As a result, LG&E and its customers will pay a higher price for gas than they would have otherwise.

5. LG&E has filed similar requests with the Commission with regard to the similar information contained in LG&E's quarterly Gas Supply Clause filings, which the Commission has granted.

6. 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.

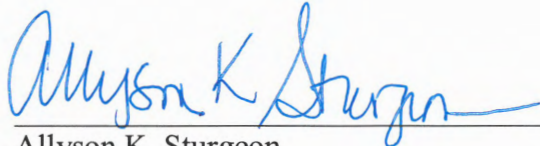
7. In accordance with the provisions of 807 KAR 5:001, Section 13, LG&E is filing with the Commission one copy of the Confidential Information printed on yellow paper or where applicable one copy with the Confidential Information highlighted in yellow and one copy without the Confidential Information

8. The public interest will be served by granting this Petition in that competition among LG&E's prospective gas suppliers will be fostered, and the cost of gas to LG&E's customers will thereby be minimized. In addition, the public interest will be served by fostering full and fair competition between LG&E and other energy service providers within LG&E's gas service territory. For this reason and because LG&E's contracts with suppliers require that the information be kept confidential, LG&E respectfully requests that the confidential material should be treated as confidential for an indefinite period of time.

**WHEREFORE**, Louisville Gas and Electric Company respectfully requests the Commission to grant confidential protection to the Confidential Information for an indefinite period of time.

Dated: September 24, 2018

Respectfully submitted,

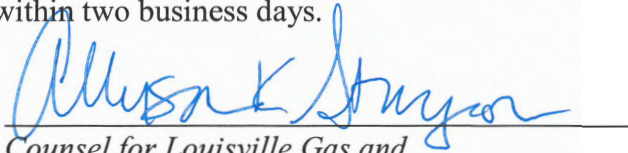


Allyson K. Sturgeon  
Managing Senior Counsel - Regulatory &  
Transactions  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville Kentucky, 40202  
Telephone: (502) 627-2088  
allyson.sturgeon@lge-ku.com

Counsel for Louisville Gas and Electric 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 28, 2018 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on September 28, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original of the filing is being delivered to the Commission within two business days.



*Counsel for Louisville Gas and  
Electric Company*