

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

In the Matter of

ELECTRONIC PURCHASED GAS)	
ADJUSTMENT FILING OF LOUISVILLE)	CASE NO. 2020-00204
GAS AND ELECTRIC COMPANY)	

**PETITION OF LOUISVILLE GAS AND ELECTRIC COMPANY
FOR CONFIDENTIAL TREATMENT OF CERTAIN INFORMATION
CONTAINED IN ITS PURCHASED GAS ADJUSTMENT FILING**

Louisville Gas and Electric Company (“LG&E”), pursuant to 807 KAR 5:001, Section 13, petitions the Commission to classify and protect as confidential certain information that is contained in its Quarterly Gas Supply Clause filing, as more fully described below:

1. LG&E is filing contemporaneously with this Petition, as required by its tariffs governing its Gas Supply Clause, a statement setting forth the summary of the total purchased gas costs for the period of February 2020 through April 2020 (“Summary”). Included in the Summary, which is included in the filing as two pages in Exhibit B-1, pages 6 and 7, is certain information the disclosure of which would damage LG&E’s competitive position and business interests. As required by 807 KAR 5:001, Section 13(2)(a)3, LG&E is providing one copy of this Summary, under seal, with the material for which confidential treatment is requested highlighted. In accordance with the terms of the Commission’s March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085 (“Electronic Emergency Docket Related to the Novel Coronavirus COVID-19”) (“COVID-19 Orders”), the Summary with the confidential material redacted will be part of the electronic filing in this proceeding and will be delivered in paper medium to the Public Service Commission within 30 days following the end of the state of emergency announced in Executive Order 2020-215 .

2. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c)1. To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party.

3. The Summary 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. This sensitive information identifies LG&E's natural gas suppliers for the period set forth and links those providers with specific gas volumes delivered and the costs thereof. Redacting the suppliers' names from the Summary will prevent other parties from piecing together the sensitive information which LG&E seeks to protect from disclosure. LG&E, therefore, proposes that the identity of each supplier be kept confidential.

Disclosure of the suppliers' identities 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 ratepayers. 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.

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

5. The information in the Summary for which LG&E is seeking confidential treatment is not known outside of LG&E and the relevant suppliers, and it is not disseminated within LG&E except to those employees with a legitimate business need to know and act upon the information.

6. 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 that the Commission classify and protect as confidential for an indefinite period of time the identity of the gas suppliers listed in the statement that sets forth the summary of the total purchased gas costs for the period of February 2020 through April 2020 and that is included in the three month filing made concurrently herewith pursuant to LG&E's Gas Supply Clause.

Sincerely,

A handwritten signature in blue ink that reads "Allyson K Sturgeon". The signature is written in a cursive style and is placed on a light-colored rectangular background.

Allyson K. Sturgeon
Managing Sr Counsel - Regulatory & Transactions
LG&E and KU Energy LLC
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

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that the electronic filing of this Petition by Louisville Gas and Electric Company is a true and accurate copy of the same documents being filed in paper medium; that the electronic filing was transmitted to the Commission on June 30, 2020; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; that within 30 days following the end of the state of emergency announced in Executive Order 2020-215 the original and six copies of this filing will be delivered to the Commission; and that on June 30, 2020, electronic mail notification of the electronic filing will be provided to the Office of the Attorney General, Office for Rate Intervention, 700 Capitol Avenue, Suite 20, Frankfort, KY 40601.



Counsel for Louisville Gas and Electric Company