

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA)	
NATURAL GAS COMPANY, INC. FOR AN)	
ADJUSTMENT OF ITS RATES AND A)	
CERTIFICATE OF PUBLIC)	CASE NO. 2021-00185
CONVENIENCE AND NECESSITY)	

PETITION OF DELTA NATURAL GAS COMPANY, INC.
FOR CONFIDENTIAL PROTECTION

Delta Natural Gas Company, Inc. (“Delta”), 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 items described herein, which Delta seeks to provide in response to Item No. 4 of the Commission Staff’s Fourth Request for Information.

Confidential or Proprietary Commercial Information (KRS 61.878(1)(c)(1))

1. The Kentucky Open Records Act exempts from disclosure information “generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records.”¹ In response to Commission Staff Item No. 4, Delta is providing as an attachment an updated estimate of the cost of the Nicholasville 8-inch transmission line. This document requires confidential treatment because it contains information that, if disclosed, would damage Delta’s competitive position and business interests. This attachment contains detailed cost component estimates for the Nicholasville Transmission 2nd Feed. In the narrative portion of the response to Commission Staff Item No. 4, Delta also describes confidential cost component information. If the Commission

¹ KRS 61.878(1)(c)(1).

grants public access to this confidential information, potential bidders on the Nicholasville 8-inch transmission line project could manipulate the bid solicitation process to the detriment of Delta and its ratepayers by tailoring bids that comport with Delta's pricing estimates rather than reflecting actual market conditions.

2. Delta respectfully requests that the Commission grant confidential protection for the information described herein for at least five years.

WHEREFORE, Delta Natural Gas Company, Inc. respectfully requests the Kentucky Public Service Commission grant confidential protection for the information described herein.

Dated: October 8, 2021

Respectfully submitted,



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Inc.

CERTIFICATE OF COMPLIANCE

This is to certify that this October 8, 2021, electronic filing is a true and accurate copy of the same documents being filed in paper medium; that the electronic filing has been transmitted to the Commission October 8, 2021; that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means; and that the original copy of this filing in paper medium will be filed by hand-delivery with the Commission in accordance with the Commission's emergency procedures.


