

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

**In the Matter of:**

<b>ELECTRONIC JOINT APPLICATION OF</b>	)	
<b>ESSENTIAL UTILITIES, INC., LDC</b>	)	
<b>FUNDING, LLC, LDC HOLDING LLC, PNG</b>	)	
<b>COMPANIES LLC, AND DELTA NATURAL</b>	)	
<b>GAS COMPANY, INC. FOR APPROVAL OF</b>	)	<b>CASE NO. 2021-00283</b>
<b>AN INDIRECT CHANGE OF CONTROL OF</b>	)	
<b>DELTA NATURAL GAS COMPANY, INC.</b>	)	

**PETITION OF JOINT APPLICANTS**  
**FOR CONFIDENTIAL PROTECTION**

Essential Utilities, Inc., LDC Funding LLC, LDC Holdings LLC, PNG Companies LLC, and Delta Natural Gas Company, Inc. (collectively, “Joint Applicants”) hereby petition 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 the Joint Applicants seek to provide in response to Item No. 2 of the Commission Staff’s First Request for Information.

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.”<sup>1</sup>

2. Commission Staff Item No. 2 asks Joint Applicants for “copies of any presentation materials made by Joint Applicants discussing the proposed corporate restructuring.” In response, Joint Applicants are providing PowerPoint slides discussing the proposed corporate restructuring.

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<sup>1</sup> KRS 61.878(1)(c)(1).

The PowerPoint is an internal document containing confidential internal corporate strategy that would disadvantage Joint Applicants if publicly disclosed.

3. Joint Applicants respectfully request the Commission grant confidential protection for the PowerPoint slides provided in response to Commission Staff Item No. 2 in their entirety for at least five years.

**WHEREFORE**, Joint Applicants respectfully requests the Kentucky Public Service Commission grant confidential protection for the information described herein.

Dated: August 9, 2021

Respectfully submitted,



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Inc.

**CERTIFICATE OF COMPLIANCE**

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on August 9, 2021; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



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