

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

IN THE MATTER OF	*	
	*	_____
ELECTRONIC TARIFF FILING OF	*	
COLUMBIA GAS OF KENTUCKY, INC.	*	CASE NO. 2021-00386
TO EXTEND ITS SMALL VOLUME GAS	*	_____
TRANSPORTATION SERVICE	*	

**XOOM ENERGY KENTUCKY, LLC, INTERSTATE GAS SUPPLY, INC., AND
CONSTELLATION NEW ENERGY, GAS DIVISION, LLC’S
JOINT MOTION FOR CONFIDENTIAL TREATMENT**

Comes now XOOM Energy Kentucky, LLC (“XOOM”), Interstate Gas Supply, Inc., (“IGS”), and Constellation New Energy, Gas Division, LLC (“CNEG”) (collectively, “Joint Intervenors”) by and through counsel, pursuant to KRS 61.878 and 807 KAR 5:001, Section 13, and seek confidential treatment for certain information filed in response to the Kentucky Public Service Commission Staff’s (“Staff”) March 31, 2022 First Request for Information to Joint Intervenors.

Staff’s request number 11 asks the Joint Intervenors for their total number of customers, total number of customers with fixed rate contracts, and total number of customers with environmental attribute contracts. The Joint Intervenors are seeking confidential protection of their responses to Staff’s request number 11. Per KRS 61.878(1)(c)(1), records confidentially disclosed to the Commission that are generally recognized as confidential or proprietary, which if disclosed would permit an unfair competitive advantage, should be deemed as confidential and protected from public disclosure. If this customer information was divulged, it would place the Joint Intervenors at a competitive disadvantage.

Per 807 KAR 5:001, Section 13(a)(2)(2), the Joint Intervenors request that this information be kept confidential for a period of five (5) years from the date of the order granting this motion.

Wherefore, the Joint Intervenors respectfully request the above referenced information be granted the appropriate status and protections due such confidential information.

Respectfully submitted,

XOOM ENERGY KENTUCKY, LLC

By Counsel

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Respectfully submitted,

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Counsel for
INTERSTATE GAS SUPPLY, INC.
And
**CONSTELLATION NEW ENERGY,
GAS DIVISION, LLC**

Dated: April 18, 2022

CERTIFICATE OF SERVICE

I hereby certify that the foregoing April 18, 2022 electronic filing is a true and accurate copy of the foregoing; that the electronic filing has been transmitted to the Commission on April 18, 2022; that pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, an original and one copy of the filing are excused from being mailed to the Commission; that there are currently no parties excused from participation by electronic service; and that, on April 18, 2022, electronic mail notification of the electronic filing is provided to all parties of record.

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