

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF SENTRA CORPORATION  
FOR APPROVAL OF SPECIAL CONTRACT

CASE NO. 2022-00359

**PETITION FOR CONFIDENTIAL TREATMENT**

Sentra Corporation (“Sentra”), by counsel, pursuant to KRS 61.878 and 807 Kentucky Administrative Regulation (“KAR”) Chapter 5:001(13) petitions the Kentucky Public Service Commission (“Commission”) for confidential treatment of the financial information and customer specific usage information contained in the Application of Sentra Corporation for Authorization to Enter Into Special Contract (“Application”).

1. Sentra’s Application requests the Commission for authorization to enter into a special contract with Indian Creek Farm, one of Sentra’s poultry customers that purchases natural gas from Sentra.

2. The Application, the Direct Testimony of Wesley Cleary, and the Special Contract contain information concerning the price to be paid to Sentra by Indian Creek Farm and the amount of natural gas used by Indian Creek Farm.

3. The information for which confidential protection is sought, information concerning the amount of natural gas to be used by Indian Creek Farm and the price to be paid by Indian Creek Farm, is commercial information that if disclosed could cause substantial competitive harm to Sentra. This information is not publicly available. Disclosure would give market participants insight into the prices at which Indian Creek Farm, a Sentra customer, is willing to

buy natural gas and the amount of natural gas it uses. If this information were available to Sentra's competitors, the competitors could use it to Sentra's competitive detriment. This information would be difficult or impossible for someone to discover from other sources. Furthermore, this information is not generally disclosed to non-management employees of Sentra and is protected internally by Sentra as proprietary information. The disclosure of this proprietary information would result in significant or irreparable competitive harm to Sentra by providing its competitors with non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information.

4. 807 KAR Chapter 5:001, Section 13, governs the treatment of confidential information filed with the Commission, and provides that documents and information exempt from disclosure under KRS 61.878 can be classified by the Commission as confidential.

5. KRS 61.878(1)(c) provides that "records confidentially disclosed to an agency or required by any agency to be disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity the disclosed the records" shall remain confidential and "be subject to inspection only upon order of a court of competent jurisdiction . . . ." The natural gas industry is very competitive. Sentra has active competitors, including propane gas marketers, who could use this information to their advantage and to the direct disadvantage of Sentra. Sentra would be at a competitive threat of loss of business due to the ability of its competitors to leverage the information to their advantage. The public disclosure of this information would permit an unfair advantage to those competitor. For these reasons, information concerning the amount of natural gas to be used by Indian Creek Farm and the price to be paid by Indian Creek Farm is exempt from public disclosure pursuant to KRS 61.878( c)(1).

6. Sentra requests that the information redacted from Sentra's Application and related documents as confidential be held confidential indefinitely. The statute and regulation cited above do not allow for disclosure at any time. Given the competitive nature of the natural gas business, it is imperative that confidential information redacted from the Application and related documents remain protected and that the integrity of the information remain secure.

Respectfully submitted,

/s/ Robert C. Moore

Robert C. Moore  
STITES & HARBISON PLLC  
421 West Main Street  
P.O. Box 634  
Frankfort, KY 40602-0634  
Telephone: (502) 223-3477  
Email: [rmoore@stites.com](mailto:rmoore@stites.com)

COUNSEL FOR SENTRA CORPORATION