

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the matter of: )  
 )  
ELECTRONIC APPLICATION OF COLUMBIA )  
GAS OF KENTUCKY, INC. TO CONTINUE ITS ) Case No. 2024-00012  
GAS COST INCENTIVE ADJUSTMENT )  
PERFORMANCE BASED RATE MAKING )  
MECHANISM )

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**COLUMBIA GAS OF KENTUCKY, INC.'S  
MOTION FOR CONFIDENTIAL TREATMENT**

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Columbia Gas of Kentucky, Inc., (“Columbia”), by and through counsel, pursuant to KRS 61.878 and 807 KAR 5:001, Section 13, petitions the Kentucky Public Service Commission (“Commission”) to afford confidential treatment to information accompanying Columbia’s Response to Commission Staff’s Second Request for Information, and respectfully states as follows:

1. Concurrent with this Motion, Columbia is filing its response to the Commission Staff’s Second Request for Information filed on May 22, 2024, pursuant to the Commission’s April 9, 2024 Procedural Order.

2. Columbia’s response to Request No. 1 includes a description of Columbia’s current status of negotiations with two interstate pipeline companies. The status of these negotiations is sensitive commercial information (“Sensitive Information”).

3. KRS 61.878(1)(c)(1) provides for the protection of information “confidentially disclosed to an agency or required by an 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 that disclosed the records.”

4. Disclosure of the Sensitive Information would violate Columbia’s agreement to maintain the confidentiality of negotiations and could be detrimental to current and future negotiations for the supply and transportation of natural gas. Further, disclosure of the status of these negotiations could be used to the disadvantage of Columbia as Columbia’s competitors and other stakeholders seek supply from the same pipeline companies. Because the costs of supply and transportation are passed directly to customers, disclosure of the Sensitive Information could possibly and unnecessarily increase the commodity cost component of customer bills.

5. The Sensitive Information is not otherwise publicly available and is protected by both Columbia and the other negotiating parties.

6. Because negotiations will be concluded by the end of March 2025, Columbia respectfully requests that the Sensitive Information be protected from public disclosure for a period of ten months.

7. Columbia’s filing made today in conjunction with this Motion, to the extent possible, is being submitted to the Commission’s public docket in redacted form and in

an unredacted form under seal to Commission Staff.

8. The public interest of the Commonwealth will be served by granting this Motion. Public disclosure of the Sensitive Information would disrupt the full and fair competition in the market for natural gas.

WHEREFORE, on the basis of the foregoing, Columbia respectfully requests the Commission to enter an Order granting this Motion for Confidential Treatment and to so afford such protection from public disclosure to the Sensitive Information for a period of ten months.

This 5th day of June, 2024.

Respectfully submitted,

*/s/ John R. Ryan* \_\_\_\_\_  
John R. Ryan  
Senior Counsel  
290 W. Nationwide Blvd.  
Columbus, Ohio 43215  
(614) 285-2220  
johnryan@nisource.com

*Counsel for Columbia Gas of Kentucky, Inc.*