

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF)	
LOUISVILLE GAS AND ELECTRIC)	CASE NO. 2024-00125
COMPANY TO REVISE ITS LOCAL)	
GAS DELIVERY SERVICE TARIFF)	

LOUISVILLE GAS AND ELECTRIC COMPANY’S
PETITION FOR CONFIDENTIAL PROTECTION

Louisville Gas and Electric Company (“LG&E”) 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 certain information LG&E is providing in Exhibits TCR-1 and TCR-2 of the Rebuttal Testimony of Tom C. Rieth. In support of this Petition, LG&E states as follows:

Confidential Personal Information – KRS 61.878(1)(a)

1. The Kentucky Open Records Act exempts from disclosure certain private and personal information.¹
2. Exhibit TCR-1 is a modeling analysis demonstrating how Louisville Metropolitan Sewer District’s (“MSD”) potential renewable natural gas (“RNG”) project will impact LG&E’s retail customers. This analysis includes information regarding MSD’s natural gas usage.
3. Exhibit TCR-2 is correspondence between MSD and LG&E, which contains MSD’s usage information, along with other customer-specific details regarding MSD’s natural gas service and planned RNG project.

¹ KRS 61.878(1)(a).

4. The identification of specific customer data is personal information that should not be in the public domain. The Commission has previously granted confidential protection to similar customer-identifying information.²

Confidential Information Subject to this Petition

5. The information for which LG&E is seeking confidential treatment is not known outside of LG&E (with the exception of the potential customers having awareness of their own information), is not disseminated within LG&E except to those employees with a legitimate business need to know and act upon the information and is generally recognized as confidential and proprietary information in the energy industry.

6. LG&E will disclose the confidential information, pursuant to a confidentiality agreement, to intervenors with a legitimate interest in this information and as required by the Commission.

7. If the Commission disagrees with this request for confidential protection, it must hold an evidentiary hearing (a) to protect LG&E's due process rights and (b) to supply the Commission with a complete record to enable it to reach a decision with regard to this matter.³

8. Pursuant to 807 KAR 5:001, Section 13(2)(b), for Exhibits TCR-1 and TCR-2, LG&E is providing written notification that the documents are confidential in their entirety. In

² See, e.g., *Electronic Tariff Filing of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation for Approval and Confidential Treatment of a Special Contract and Cost Analysis Information and a Request for Deviation from the Commission's September 24, 1990 Order in Administrative Case No. 327*, Case No. 2021-00282, Order at 19-21 (Ky. PSC Oct. 14, 2021) (granting indefinite confidential protection to materials containing projected power usage for a Bitcoin mining customer); *Electronic Application of Duke Energy Kentucky, Inc. for 1) An Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief*, Case No. 2019-00271, Order at 9-10 (Ky. PSC May 4, 2020) (granting confidential protection for twenty years to materials containing projected power usage for Amazon Air Hub facility); *Application of Kentucky Utilities Company for an Adjustment of its Electric Rates*, Case No. 2012-000221, Order at 1-2 (Ky. PSC July 25, 2013) (granting indefinite confidential protection to materials containing customer names, account numbers, and usage information for customers served under All Electric School rate schedule).

³ *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, 642 S.W.2d 591, 592-94 (Ky. App. 1982).

accordance with the Commission's March 24, 2020 and July 22, 2021 Orders in Case No. 2020-00085, LG&E will provide copies of the confidential documents to the Commission by email. Access to the confidential information will be provided to intervenors upon request pursuant to a confidentiality agreement.

9. Due to the personally sensitive nature of customer-identifying information, LG&E requests that the customer-identifying information contained in Exhibits TCR-1 and TCR-2 remain confidential indefinitely.

WHEREFORE, Louisville Gas and Electric Company respectfully requests that the Commission issue an order granting protection from public disclosure for the confidential information specifically described in this petition.

Dated: August 7, 2024

Respectfully submitted,



Monica H. Braun
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507
Ph: 859-231-3000
Fax: 859-253-1093
monica.braun@skofirm.com

Allyson K. Sturgeon, Vice President and
Deputy General Counsel
Sara V. Judd, Senior Counsel
PPL Services Corporation
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
ASturgeon@pplweb.com
SVJudd@pplweb.com

Counsel for Louisville Gas and Electric Company

CERTIFICATE OF SERVICE

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 7, 2024, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink, appearing to read "Sam V. Judd".

Counsel for Louisville Gas and Electric Company