

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION KENTUCKY	)	
FRONTIER GAS, LLC FOR DECLARATORY	)	CASE NO.
ORDER ON FREE GAS	)	2025-00042

MOTION FOR CONFIDENTIAL TREATMENT

Comes now Kentucky Frontier Gas, LLC (“Kentucky Frontier”), by and through counsel, pursuant to KRS 61.878, 807 KAR 5:001, Section 13 and other applicable law, and for its motion requesting that the Kentucky Public Service Commission (“Commission”) afford confidential treatment to certain information filed in response to Commission Staff’s First Request for Information (“Staff’s First Request”) in this matter. In support of its motion, Kentucky Frontier hereby states as follows:

1. On February 19, 2025, Kentucky Frontier filed an Application for a Declaratory Order. On November 11, 2025, Commission Staff issued its First Request for Information. Kentucky Frontier is providing its responses contemporaneously with this motion.

2. In response to Staff’s First Request, Item 5, Kentucky Frontier is providing a map of the Fontaine-Williams Gas Gathering System, LLC (“FWGGS”). In response to Staff’s First Request, Item 11, Kentucky Frontier is providing the names and address of certain individuals. Collectively, the information described above is designated as the “Confidential Information” for which protection is sought under KRS 61.878(1)(a) and KRS 61.878(1)(m). Disclosure of the Confidential Information would permit an unfair commercial advantage to third parties and present

an unnecessary and unreasonable infringement upon Kentucky Frontier's legitimate privacy concerns.

3. The Kentucky Open Records Act and applicable precedent exempts the Confidential Information from disclosure, including KRS 61.878(1)(a); KRS 61.878(1)(m); *Zink v. Department of Workers Claims, Labor Cabinet*, 902 S.W.2d 825 (Ky. App. 1994); *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766, 768 (Ky. 1995). The public disclosure of the Confidential Information would be a disclosure of critical infrastructure and an unwarranted invasion of personal privacy. For these reasons, the Confidential Information satisfies both the statutory and common law standards for affording confidential treatment.

4. In response to Staff's First Request, Item 5, Kentucky Frontier is providing a map of the known route of the FWGGS pipeline. If this map were disclosed it would expose the route of a gas line that is critical infrastructure. This map is exempt from disclosure pursuant to KRS 61.878(1)(m)(1)(f). This information is confidential and proprietary and typically only disclosed on a need-to-know basis.

5. In response to Staff's First Request, Item 11, Kentucky Frontier is providing a list of the known addresses and occupants of individuals taking service on the gas line. This information should be granted confidential protection based upon KRS 61.878(1)(a) because disclosure of these names would be an unwarranted invasion of personal privacy. These individuals are not parties to this proceeding. Additionally, revealing the location of the addresses should be confidential pursuant to KRS 61.878(1)(m)(1)(f) because disclosure of the addresses would reveal the location of the pipeline and expose critical infrastructure.

6. Overall, the Confidential Information consists of sensitive and proprietary information that is retained by Kentucky Frontier on a "need-to-know" basis. The Confidential

Information is distributed within Kentucky Frontier only to those employees who must have access for business reasons and is generally recognized as confidential and proprietary in the energy industry.

7. Kentucky Frontier does not object to limited disclosure of the Confidential Information, pursuant to an acceptable confidentiality and nondisclosure agreement, to intervenors with a legitimate interest in reviewing same for the sole purpose of participating in this case. Kentucky Frontier reserves the right to object to providing the Confidential Information to any intervenor if said provision could result in liability to Kentucky Frontier under any Confidentiality Agreement or Non-Disclosure Agreement.

8. In accordance with the provisions of 807 KAR 5:001, Section 13(2), Kentucky Frontier is filing separately under seal one (1) unredacted copy of each of the attachments. Since Kentucky Frontier is requesting confidential treatment for the entirety of the documents, a redacted copy is not being filed in the record. Kentucky Frontier is noting in the responses confidential information is being filed.

9. In accordance with the provisions of 807 KAR 5:001, Section 13(2), Kentucky Frontier respectfully requests that the Confidential Information be withheld from public disclosure for an indefinite period.

10. If, and to the extent, the Confidential Information becomes publicly available or otherwise no longer warrants confidential treatment, Kentucky Frontier will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10).

WHEREFORE, on the basis of the foregoing, Kentucky Frontier respectfully requests that the Commission classify and protect as confidential the Confidential Information described herein for an indefinite period.

This the 26th day of November 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on November 26, 2025, and that there are no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to prior Commission Orders, no paper copies of this filing will be made.

Heather S. Temple

Counsel for Kentucky Frontier Gas, LLC