

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

In the Matter of:

ELECRONIC APPLICATION OF KENTUCKY      )  
FRONTIER GAS, LLC FOR AN ALTERNATIVE )      Case No  
RATE FILING PURSUANT TO 807 KAR 5:076    )      2025-00277  
AND OTHER GENERAL RELIEF                )

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**MOTION FOR CONFIDENTIAL TREATMENT**

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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 its responses to post hearing data requests in this matter.

In support of its motion, Kentucky Frontier hereby states as follows:

1. Kentucky Frontier’s response to Commission Staff’s post hearing data request (“Staff’s PHDR”) No. 2 includes an exhibit that contains the same information that was included in Kentucky Frontier’s response to Staff’s First Request for Information (“Staff’s First Request”) Item 9 and in Kentucky Frontier’s Rebuttal Testimony. The exhibit contains the job titles and job descriptions of employees. Kentucky Frontier requests confidential treatment for the job titles and job descriptions.
2. Kentucky Frontier’s response to Staff’s PHDR No. 16 includes an exhibit for its insurance proposal. Kentucky Frontier is requesting confidential treatment for the name of the insurance companies as well as the premiums being paid for the insurance coverage.

3. The information described above is designated as the “Confidential Information” for which protection is sought under KRS 61.878(1)(c)(1). 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 and the privacy rights of Kentucky Frontier’s employees.

4. The Kentucky Open Records Act and applicable precedent exempts the Confidential Information from disclosure, including KRS 61.878(1)(a); KRS 61.878(1)(c)(1); *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 harm Kentucky Frontier’s competitive position in the marketplace by offering competitors insights into the wages paid to Kentucky Frontier’s employees, to the detriment of Kentucky Frontier and its employees when coupled with the prior filings that have been made on this same topic in this proceeding. This information is not otherwise publicly available. The confidentiality of this information is critical to Kentucky Frontier’s effective execution of business decisions and strategy. For these reasons, the Confidential Information satisfies both the statutory and common law standards for affording confidential treatment.

5. Kentucky Frontier is a small utility with few employees. Revelation of employee titles and/or job descriptions would easily allow discovery of what salary is being paid to which employees, when coupled with information previously provided in this proceeding, thereby harming Kentucky Frontier’s ability to competitively hire and retain employees. Kentucky Frontier’s competitors, if given access to this information, could harm Kentucky Frontier’s position in the market.

6. Regarding the information sought by Request No. 16, Kentucky Frontier has worked to get the best market price for insurance coverage and at times has recently found it difficult to obtain coverage for a small gas utility and therefore seeks confidential treatment of the insurance premiums being paid and the companies that are providing insurance coverage. Confidential treatment of the insurance premiums and names of the companies providing insurance will protect Kentucky Frontier's position in the market and its ability to maintain insurance coverage. Disclosure of this information could make it more difficult for Kentucky Frontier to obtain insurance in the future should it ever lose coverage or need to switch coverage for any reason. This information is confidential and proprietary and typically only disclosed on a need-to-know basis.

7. 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.

8. 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.

9. 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 the exhibit. Kentucky Frontier is redacting and noting in the public version of the filing the confidential information.

10. 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.

11. 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 16<sup>th</sup> day of February 2026.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing was transmitted to the Commission on February 16, 2026, 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.

A handwritten signature in blue ink that appears to read "Meredith Cane".

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*Counsel for Kentucky Frontier Gas, LLC*