

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENUTCKY)	
FRONTIER GAS, LLC FOR AN ALTERNATIVE)	CASE NO.
RATE FILING PURUSANT TO 807 KAR 5:076)	2025-00277
AND OTHER GENERAL RELIEF)	

MOTION FOR CONFIDENTIAL TREATMENT

Comes now Kentucky Frontier Gas, LLC (“Kentucky Frontier”) by counsel, pursuant to KRS 61.878, 807 KAR 5:001 Section 13, and other applicable law, and respectfully moves the Commission to afford confidential treatment to certain information and documents filed by Kentucky Frontier in its Application in the above-styled matter. In support of this request, Kentucky Frontier states as follows:

1. Kentucky Frontier is filing the motion contemporaneously with its Application for a rate adjustment pursuant to 807 KAR 5:076.
2. Kentucky Frontier requests the Commission to afford confidential protection to certain information being filed by Kentucky Frontier in its Application. The information provided is proprietary, personal, confidential, sensitive, and commercially valuable information. Pursuant to 807 KAR 5:076, Section 4(e), Kentucky Frontier is including its federal and state tax returns. This information is collectively referred to as the “Confidential Information.”
3. The Kentucky Open Records Act and applicable precedent exempts the Confidential Information from disclosure, including KRS 61.878(1)(l); 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 Confidential Information is publicly unavailable, and its confidentiality is critical to Kentucky Frontier's effective execution of business decisions and strategy. The information is also protected by KRS 61.878(1)(l) because the documents are Kentucky Frontier's tax returns. For these reasons, the Confidential Information satisfies both the statutory and common law standards for affording confidential treatment.

4. The Application includes Kentucky Frontier's tax returns pursuant to 807 KAR 5:076, Section 4(e). This information should be granted confidential treatment pursuant to KRS 61.878(1)(l) because information related to tax administration is prohibited from divulgence or disclosure.

5. Kentucky Frontier is requesting confidential protection for the entirety of the tax returns. Therefore, pursuant to 807 KAR 5:001, Section 13(2)(a)(3)(b), Kentucky Frontier is not providing the confidential documents with highlights. Kentucky Frontier is noting in the public version of the Application, that the confidential material is being filed under seal.

6. 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.

7. 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 seek to have confidential protection 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 specific Confidential Information described herein for an indefinite period.

This the 29th day of August, 2025.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the electronic filing was transmitted to the Commission on August 29, 2025 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be made.



Counsel for Kentucky Frontier Gas, LLC