

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 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	)	

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 the Attorney General’s first request for information. In support of its motion, Kentucky Frontier hereby states as follows:

1. Kentucky Frontier’s Responses to the Attorney General’s First Request for Information includes items which involve the discussion or identification of information that is confidential and proprietary including the following:

- Request No. 1 asks for a map of Frontier’s natural gas service area; and
- Request Nos. 23, 24, and 26 ask for information specific to Kentucky Frontier’s confidential corporate tax returns.

2. Collectively, 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.

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)(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 operating costs, resource investment calculations, anticipated load growth, the impact to future year revenue requirements, and system average costs of Kentucky Frontier that are not otherwise publicly available and would be to the detriment of Kentucky Frontier. Additionally, the Confidential Information is publicly unavailable. 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.

4. Regarding the information sought by Request No. 1, the response includes identifications and depictions of certain critical utility infrastructure necessary to transmit natural gas in the region. If this map is disclosed, the information could be utilized to commit or further a criminal or terrorist act, disrupt critical public utility systems, and/or intimidate or coerce the civilian population. Disclosure of the Confidential Information could also result in the disruption of innumerable other infrastructure systems which relate to, or rely upon, the safe and reliable provision of water in the area. Moreover, the disclosure of the Confidential Information could have a reasonable likelihood of threatening the public safety. Put plainly, maintaining the confidentiality

of the map of Kentucky Frontiers natural gas service area is necessary to protect the interests of Kentucky Frontier, its customers, and the region at large.

5. Regarding the information sought by Request Nos. 23, 24, and 26, Kentucky Frontier's corporate tax returns contain information regarding income, budgeting information, and general asset information that is not otherwise publicly available. The information is proprietary and disclosure of the same could impact Kentucky Frontier's position in the market by providing competitors insight into Kentucky Frontier's financial position, strength, and capabilities.

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. Kentucky Frontier is redacting and noting in the public version of the filing all of the confidential responses.

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 19th day of November 2025

Respectfully submitted,



L. Allyson Honaker
Heather S. Temple
Meredith L. Cave
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 1203
Lexington, KY 40509
(859) 368-8803
allyson@hloky.com
heather@hloky.com
meredith@hloky.com
Counsel for Kentucky Frontier Gas, LLC

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on November 19, 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.

A handwritten signature in blue ink, appearing to read "Meredith Case". The signature is fluid and cursive, with the first name "Meredith" and the last name "Case" clearly distinguishable.

Counsel for Kentucky Frontier Gas, LLC