COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF	)	
COLUMBIA GAS OF KENTUCKY, INC.	)	CASE NO.
FOR AN ADJUSTMENT OF RATES;	)	2026-00099
APPROVAL OF DEPRECIATION STUDY;	)	
APPROVAL OF TARIFF REVISIONS; AND	)	
OTHER RELIEF	)	

MOTION FOR CONFIDENTIAL TREATMENT

Comes now Columbia Gas of Kentucky, Inc. ("Columbia"), 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 information provided in Responses to Commission Staff's Third Request for Information ("Staff's Third Request") and the Office of Attorney General's Second Request for Information ("AG's Second Request"). In support of its motion, Columbia hereby states as follows:

1. On July 17, 2026, Commission Staff issued Staff's Third Request and on July 21, 2026, the Office of the Attorney General issued AG's Second Request. Contemporaneously with this Motion, Columbia is filing its responses to Staff's Third Request and AG's Second Request.

2. Columbia is requesting confidential protection of its responses to the following data requests:

- Staff's Third Request, Item 2 Attachment A required Columbia to provide the NiSource Corporate Services Company ("NCSC") payroll and the number of employees included in the payroll.
- Staff's Third Request, Item 24 Attachments A and B provide lists of compensation information for employees that have separated from the Company since December 31, 2025.
- Staff's Third Request, Item 34 Attachment A includes the Basis 1-20 derivation percentages for 2023-2025.
- AG's Second Request, Item 5, Attachments A-K include documents related to allocated IT expenses.
- AG's Second Request, Item 6, Attachment A provides audit reports including enterprise architecture planning and strategy, corporate allocations, rate case management, employee relations process, and property tax process.
- AG's Second Request, Item 17, Attachment C contains third-party actuarial studies.

3. Collectively, the information described above is designated as the "Confidential Information" for which protection is sought under KRS 61.878(1)(a), 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 Columbia's legitimate privacy concerns.

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 Columbia's competitive position in the marketplace by offering competitors insights into information that is not otherwise publicly available and would be to the detriment of Columbia. The confidentiality of this information is critical to Columbia'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. Columbia is requesting confidential treatment of its response to Staff's Third Request, Item 2, Attachment A, which contains total payroll costs of NCSC affiliates. Columbia is providing Attachment A, which contains dollar figures and percentages of gross base salaries and overtime pay for Columbia's affiliates who are not parties to this proceeding and which should be kept confidential pursuant to KRS 61.878(1)(a) and KRS 61.878(1)(c)(1). The information is not generally disclosed, internally or externally, and, if disclosed, could harm NiSource and its other operating corporations

and could ultimately impact costs that are allocated to Columbia Kentucky and its customers. Columbia's affiliates are not parties to this proceeding and are not subject to the Commission's jurisdiction and therefore, the sensitive information should be confidential. The sensitive information regarding the amounts these entities pay for services and specifics about how their revenues are collected should be confidential in this proceeding. The affiliates have a reasonable expectation that their inner business workings would not be made public in a proceeding to which they are not a party to. The Commission has granted confidential treatment to information regarding Columbia Kentucky's affiliates in the past[1] and Columbia Kentucky respectfully requests that the Commission do the same in this case.

6. Columbia is requesting confidential treatment for the position titles in Staff's Third Request, Item 24 Attachment A (employes of Columbia) and Attachment B (NCSC employees) pursuant to KRS 61.878(1)(c)(1). Due to the competitive nature of these jobs and the job market, this information, if disclosed, could be used to unfairly disadvantage the Company in salary negotiations and its ability to recruit and retain skilled employees. Importantly, these are positions that have recently been vacated since December 31, 2025, which makes this information of keen interest to prospective future candidates that may be interested in joining Columbia and/or NiSource as the Company

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[1] *Electronic Application of Columbia Gas of Kentucky, Inc. for an Adjustment of Rates; Approval of Depreciation Study; Approval of Tariff Revisions; Issuance of a Certificate of Public Convenience and Necessity; and Other Relief*, Case No. 2021-00183 (Order entered August 19, 2021).

may be in the process or intending to backfill those very positions. This compensation information, if publicly revealed, could also be used by third-party recruiters and hiring services (e.g. Glassdoor and Indeed) to develop compensation profiles that will create expectations and increase competition for these skilled positions. Moreover, these are non-executive positions. For some of these positions, there is a single person such that it would publicly reveal the specific compensation information for that individual further exacerbating the concerns of competitive harm. The information is not generally disclosed; in fact, this information is kept extremely limited even within the Company as the revelation of such compensation information could even cause employment issues internally if they were made public. Indeed, the Commission recently granted, in this very case, confidentiality to similar information under a similar approach of redacting job title in response to Staff Set 1, Request 48, Attachment A.[2] Additionally, Columbia's response also includes information regarding affiliates who are not parties to this proceeding including affiliates' employee's job title, salary, allocation to CKY for 2025, O&M expense ratio, incentive compensation, and gross benefits cost which should be kept confidential pursuant to KRS 61.878(1)(c)(1). Columbia's affiliates are not parties to this proceeding and are not subject to the Commission's jurisdiction and therefore, the sensitive information should be confidential. The affiliates have a reasonable expectation that their inner business workings would not be made public in a proceeding to which

[2] Order at ¶ 4 (Jul. 8, 2026).

they are not a party to. The Commission has granted confidential treatment to information regarding Columbia Kentucky's affiliates in the past[3] and Columbia Kentucky respectfully requests that the Commission do the same in this case. If the information contained in Staff's Third Request, Item 24 Attachment A and Attachment B were disclosed publicly, it could harm NiSource and its other operating corporations and could ultimately negatively impact costs that are allocated to and incurred by Columbia and its customers.

7. Columbia is requesting confidential treatment to Staff's Third Request, Item 34 regarding the derivation of the Basis 1-20 allocation percentages for 2023, 2024, and 2025 including each input to the calculation on the basis of KRS 61.878(1)(c)(1) as it discloses allocations specific to Columbia Kentucky's affiliates which are not parties to this proceeding. The information contained in Staff's Third Request, Item 34 Attachment A is voluminous and reveals tremendous details about the affiliate bases allocation calculations. Indeed, the responsive documents are comprised of over sixty (60) unique Excel spreadsheets. The information is not generally disclosed and, if disclosed, could harm NiSource and its other operating corporations and could ultimately impact costs that are allocated to Columbia Kentucky and its customers. Columbia's affiliates are not parties to this proceeding and are not subject to the Commission's jurisdiction and therefore, the sensitive information should be confidential. The affiliates have a

[3] *Id.*

reasonable expectation that their inner business workings would not be made public in a proceeding to which they are not a party to. The Commission has granted confidential treatment to information regarding Columbia Kentucky's affiliates in the past[4] and Columbia Kentucky respectfully requests that the Commission do the same in this case.

8. Columbia is requesting confidential treatment for AG's Second Request, Item 5, which requested documentation supporting the IT increase in the forecasted test period, including "invoices, contracts, quotes" on the basis of KRS 61.878(1)(c)(1). Attachments A through K, which are being provided in response to are the same documents over which Columbia has sought confidential treatment in Case No. 2026-00129. Public disclosure of the Attachment A through Attachment K provided in response to AG's Second Request, Item 5 would reveal third party agreements with certain consultants and contractors, including negotiated contract rates and terms that are not otherwise publicly available. This would reveal Columbia's business strategy by providing valuable insight into Columbia's software operations which reveals Columbia's priorities, risk tolerance, and relative value of particular items in Columbia's business operations. Moreover, if disclosed publicly, could create a competitive disadvantage for Columbia in the marketplace because it would provide Columbia's competitors with Columbia's negotiated pricing and contract terms creating an unfair commercial advantage for others when negotiating future contracts.

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[4] *Id.*

9. Columbia is requesting confidential treatment for AG's Second Request, Item 6, Attachment A, which requests audit reports including enterprise architecture planning and strategy, corporate allocations, rate case management, employee relations process, and property tax process on the basis of KRS 61.878(1)(c)(1) because the requested audits give insight into the inner workings of Columbia Kentucky and is not otherwise publicly available. Audit information is the pinnacle of internal information that is safeguarded and not widely disseminated. In fact, every page of each audit report contains the language "CONFIDENTIAL – FOR INTERNAL USE ONLY." This privately held information, if disclosed, would create a competitive disadvantage for Columbia. Columbia believes that confidential protection of audit reports would assist in preserving the sanctity of these reviews.

10. Columbia is requesting confidential treatment for AG's Second Request Item 17, Attachment C which contains third party actuarial studies. The third-party actuarial report was prepared for Columbia under the assumptions of confidentiality and is not to be relied upon by any outside viewers. The report is not generally disclosed or otherwise publicly available. If disclosed, this report would reveal inner workings and business strategies of Columbia Kentucky which could give market competitors an advantage and create a disadvantage for Columbia Kentucky and should be granted confidential treatment pursuant to KRS 61.878(1)(c)(1). Additionally, Columbia has redacted certain portions of the confidential Attachment C, even in the confidential

version, since those portions are not responsive or relevant to the question requesting reasons for ***Columbia of Kentucky's*** increase in the FTP over 2025 levels.

11. Overall, the Confidential Information consists of sensitive and proprietary information that is retained by Columbia on a "need-to-know" basis. NiSource and Columbia take all reasonable measures to prevent disclosure of the Confidential Information. Moreover, the Confidential Information is distributed within Columbia only to those employees who must have access for business reasons and is generally recognized as confidential and proprietary in the energy industry.

12. Columbia 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. Columbia reserves the right to object to providing the Confidential Information to any intervenor if said provision could result in liability to Columbia under any Confidentiality Agreement or Non-Disclosure Agreement. Columbia further reserves the right to object to sharing the Confidential Information with any party that may have a mixed-motive for accessing the Confidential Information, that may be a competitor of Columbia in any market, who may have a commercial conflict of interest or for any other reason.

13. In accordance with the provisions of 807 KAR 5:001, Section 13(2), Columbia is filing separately under seal one (1) unredacted copy of the information. For

the Attachments to Staff's Third Request, Item 24 Columbia is providing the document with highlights. The rest of the documents do not contain highlights because confidential treatment is requested for the entirety of the document. Columbia is noting in the public version the filing confidential responses.

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

15. If, and to the extent, the Confidential Information becomes publicly available or otherwise no longer warrants confidential treatment, Columbia 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, Columbia respectfully requests that the Commission classify and protect as confidential the Confidential Information described herein for an indefinite period.

This the 4th day of August 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 August 4, 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.

L Allyson Honaker

Counsel for Columbia Gas of Kentucky, Inc.