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PUBLIC SERVICE
COMMISSION

Mr. Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

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Company**
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April 19, 2010

RE: *Application of Louisville Gas and Electric Company for a Certificate of
Public Convenience and Necessity for the Construction of Transmission
Facilities in Trimble County, Kentucky*
Case No. 2005-00155

Dear Mr. DeRouen:

Enclosed please find and accept an original and three copies of "as-built" maps of the 345 kV transmission line built by Louisville Gas and Electric Company pursuant to the Commission's Order dated September 8, 2005 in the above mentioned proceeding.

These maps are being filed pursuant to a Petition for Confidential Protection.

Please contact me if you have any questions concerning this filing.

Sincerely,

Rick E. Lovekamp

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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**PUBLIC SERVICE
COMMISSION**

In the Matter of:

**APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR A CERTIFICATE OF) CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR) 2005-00155
THE CONSTRUCTION OF TRANSMISSION)
FACILITIES IN TRIMBLE COUNTY, KENTUCKY)**

**PETITION OF LOUISVILLE GAS AND ELECTRIC COMPANY
FOR CONFIDENTIAL PROTECTION OF CERTAIN AS-BUILT MAPS**

Louisville Gas and Electric Company (“LG&E” or the “Company”) pursuant to 807 KAR 5:001, Section 7, respectfully petitions the Commission to classify as confidential and protect from public disclosure maps provided pursuant to the Commission’s Order dated September 8, 2005 in the above-referenced case. Specifically, the maps contained herein provide detailed information concerning the Company’s transmission system and, in their entirety, contain critical energy infrastructure information. For reasons involving homeland security, the Company respectfully requests that the Commission grant confidential protection to these documents.

In further support of this Motion, the Company states as follows:

1. Under the Kentucky Open Records Act, the Commission is entitled to withhold from public disclosure information confidentially disclosed to it to the extent that open disclosure would “have a reasonable likelihood of threatening the public safety by exposing a vulnerability in preventing, protecting against, mitigating, or responding to a terrorist act and limited to: ... (f) infrastructure records that expose a vulnerability referred to in this subparagraph through the disclosure of the location, configuration, or security of critical systems, including public

utility critical systems. These critical systems shall include but not be limited to information technology, communication, electrical, fire suppression, ventilation, water, wastewater, sewage, and gas systems and (g) the following records when their disclosure will expose a vulnerability referred to in this subparagraph: detailed drawings, schematics, maps, or specifications of structural elements, floor plans, and operating, utility, or security systems of any building or facility owned, occupied, leased, or maintained by a public agency.” See KRS 61.878(1)(m)1. Succinctly put, the maps attached hereto provide very detailed information about the Company’s transmission system; as such, the disclosure of which could threaten the public safety generally.

2. The information for which the Company is seeking confidential treatment is not known outside of the Company, is not disseminated within the Companies except to those employees with a legitimate business need to know and act upon the information, and is generally recognized as confidential and proprietary information in the energy industry.


3. If the Commission disagrees with this request for confidential protection, it must hold an evidentiary hearing (a) to protect the Company’s due process rights and (b) to supply the Commission with a complete record to enable it to reach a decision with regard to this matter. Utility Regulatory Commission v. Kentucky Water Service Company, Inc., Ky. App., 642 S.W.2d 591, 592-94 (1982).

4. The Company is filing with the Commission an original and three copies of the “as built” maps identified as confidential.

WHEREFORE, Louisville Gas and Electric Company respectfully requests that the Commission grant confidential protection to these documents, in their entirety.

Dated: April 16, 2010

Respectfully submitted,

A handwritten signature in black ink that reads "Allyson K. Sturgeon". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Allyson K. Sturgeon
Senior Corporate Counsel
E.ON U.S. LLC
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Louisville, Kentucky 40202
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Counsel for Louisville Gas and Electric
Company