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**VIA OVERNIGHT DELIVERY**

April 9, 2015

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

Re: *Duke Energy Kentucky, Inc. Alleged Failure to Comply with KRS 278.042, Case No. 2014-00165.*

Dear Mr. Derouen:

Per paragraphs 5 and 6 of the August 27, 2014, Stipulation in the above-referenced case, Duke Energy Kentucky, Inc. (Duke Energy Kentucky) hereby reports the following updates:

**Paragraph #5**

Within ten days of the adoption of the Work Standards Manual revisions described above, and the Health and Safety Handbook, Duke Energy will file a notice with the Commission indicating the dates of adoption of the Work Standard Manual revisions and the Health and Safety Handbook.

**Response**

The Health and Safety Handbook and revisions to the Work Standards Manual are complete and were effective April 1, 2015.

**Paragraph # 6**

Duke Energy will provide the Commission with a copy of the revised Work Standards Manual and a copy of its new Health and Safety Handbook within ten days of their adoption.

Mr. Jeff Derouen  
April 9, 2015  
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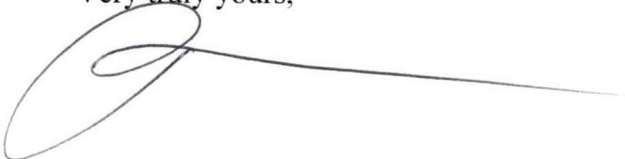
**Response**

Copies of the Confidential Health and Safety Handbook and Work Standards Manual are being provided on the enclosed CD, along with a Petition for Confidential Treatment. Please note the applicable section of the Work Standards Manual is 1.5.

Please file stamp the two copies of this letter and return in the enclosed return-addressed envelope.

Thank you for your consideration in this matter.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal line extending to the right.

Rocco D'Ascenzo  
Associate General Counsel

cc: Staff Counsel

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: )  
DUKE ENERGY KENTUCKY, INC. )  
\_\_\_\_\_)  
ALLEGED FAILURE TO COMPLY WITH )  
KRS 278.042 )

Case No. 2014-00165

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**PETITION OF DUKE ENERGY KENTUCKY, INC.  
FOR CONFIDENTIAL TREATMENT OF INFORMATION  
CONTAINED IN ITS RESPONSE TO THE AUGUST 27, 2014 STIPULATION**

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Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), pursuant to 807 KAR 5:001, Section 13, respectfully requests the Commission to classify and protect certain information provided by Duke Energy Kentucky in its response to the August 27, 2014, Stipulation (Stipulation). The information being provided includes Duke Energy Corporation's Health and Safety Handbook and Work Standards Manual and Duke Energy Kentucky now seeks confidential treatment (Confidential Information), as these documents contain proprietary business information and are prepared for internal purposes only. Disclosure of this proprietary business information would injure Duke Energy Kentucky and its business interests.

In support of this Petition, Duke Energy Kentucky states:

1. The Kentucky Open Records Act exempts from disclosure certain commercial information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the commercial

information would permit an unfair advantage to competitors of that party. Public disclosure of the information identified herein would, in fact, prompt such a result for the reasons set forth below.

2. The Confidential Information is distributed within Duke Energy Corporation for business purposes only and is not known outside of Duke Energy Corporation.

3. Duke Energy Kentucky does not object to limited disclosure of the confidential information described herein, pursuant to an acceptable protective agreement, with the Attorney General or other intervenors with a legitimate interest in reviewing the same for the purpose of participating in this case.

4. This information was, and remains, integral to Duke Energy Kentucky's effective execution of business decisions. And such information is generally regarded as confidential or proprietary. Indeed, as the Kentucky Supreme Court has found, "information concerning the inner workings of a corporation is 'generally accepted as confidential or proprietary.'" *Hoy v. Kentucky Industrial Revitalization Authority*, 904 S.W.2d 766, 768 (Ky. 1995).

5. In accordance with the provisions of 807 KAR 5:001, Section 13(3), the Company is filing one copy of the Confidential Information separately under seal.

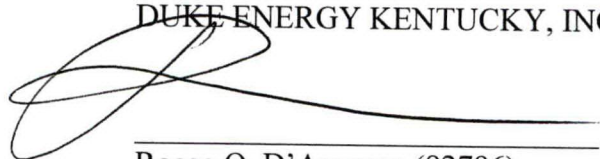
6. Duke Energy Kentucky respectfully requests that the Confidential Information be withheld from public disclosure for a period of ten years. This will assure that the Confidential Information – if disclosed after that time – will no longer be commercially sensitive so as to likely impair the interests of the Company or its customers if publicly disclosed.

7. To the extent the Confidential information becomes generally available to the public, whether through filings required by other agencies or otherwise, Duke Energy Kentucky will notify the Commission and have its confidential status removed, pursuant to 807 KAR 5:001 Section 13(10)(a).

WHEREFORE, Duke Energy Kentucky, Inc., respectfully requests that the Commission classify and protect as confidential the specific information described herein.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



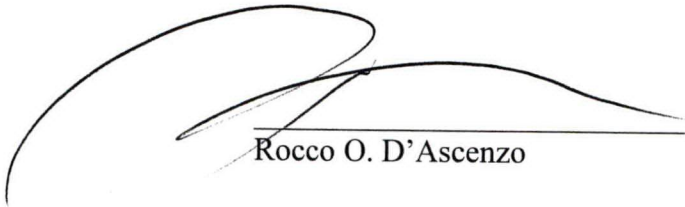
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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been served via overnight mail delivery to the following party on this 9<sup>th</sup> day of April 2015:

Staff Counsel  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, Kentucky 40601



Rocco O. D'Ascenzo