

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR APPROVAL OF REVISED RATES TO	)	CASE NO.
BE RECOVERED THROUGH ITS GAS LINE TRACKER	)	2015-00360
BEGINNING WITH THE FIRST BILLING CYCLE FOR	)	
JANUARY, 2016	)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within seven days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

LG&E fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, LG&E shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to pages 3-4 of the application, specifically to the descriptions of three incidents that have occurred in the gas industry on Aldyl-A piping. The complete paragraph contains a sentence which indicates that DuPont Chemical Company was the manufacturer of Aldyl-A piping from 1965 to 1991. For each of the incidents, which occurred in 1994, 1996, and 2011, respectively, provide the year, or years, in which the piping associated with the incident was installed.

2. Refer to the second full paragraph on page 4 of the application, which refers to initiatives taken by utilities to replace Aldyl-A piping, with some utilities using accelerated, large-scale programs. Provide a list of the utilities undertaking these initiatives, the year in which the utility began its initiative, and the jurisdiction(s) in which the utility operates. Indicate the utilities with accelerated programs and the planned duration (number of years) of their accelerated programs.

3. Refer to the third full paragraph on page 4 of the application, which shows the miles of Aldyl-A mains and the number of Aldyl-A services on the LG&E system. Identify the decade (1960s, 1970s, etc.) in which these Aldyl-A facilities were installed.

4. Refer to the first paragraph on page 5 of the application, which refers to how the planned replacement of Aldyl-A piping will follow the same process as "LG&E's Large Scale Main Replacement program." Explain if replacement of the Aldyl-A piping will differ in any way from the Large Scale Main Replacement program regarding whether the old piping will be buried or be excavated.

5. Refer to Exhibit 2 of the original and amended applications, specifically, the pages identified as Exhibit A, page 1 of 1.

a. On Exhibit A to the original application, the total shown on line 6 of the column headed "Revenue Requirement" is \$25,558,398. Confirm that the amount of revenue generated using (1) the number of bills and (2) the year 2016 monthly rate per bill amounts on this exhibit is \$25,575,325, approximately \$17,000 greater than the amount of the revenue requirement.

b. On Exhibit A to the amended application, line 1 in the "Year 2016 Monthly Rate Per Bill" shows the rate for Rate RGS as \$4.88. Clarify whether this rate is intended to be \$4.89 rather than \$4.88.

c. The revenue requirement for Rate RGS on Exhibit A to the original application is \$17,235,938, while the corresponding amount on Exhibit A to the amended application is \$17,254,632. Confirm that the resulting rates, based on the number of bills of 3,535,390, are \$4.875 using the revenue requirement in the original application and \$4.881 using the revenue requirement in the amended application.

d. On Exhibit A to the amended application, the total shown on line 6 of the column headed "Revenue Requirement" is \$25,586,119.

(1) Confirm that the amount of revenue generated using (1) the number of bills and (2) the year 2016 monthly rate per bill amounts on this exhibit (if rate RGS is \$4.89) is \$25,620,226, approximately \$34,000 greater than the amount of the revenue requirement.

(2) Confirm that if Rate RGS is \$4.88, the revenue generated is \$25,584,872, which results in an approximate \$1,250 revenue shortfall.

(3) Confirm that increasing Rate IGS from \$246.48 to \$246.49 increases the revenue generated to \$25,587,891, exceeding the revenue requirement.

6. Refer to the Application. Provide an electronic copy of the Application in Excel format with all formulas intact and cells unprotected.

7. Refer to the Testimony of Lonnie E. Bellar in Case No. 2012-00222,<sup>1</sup> Bellar Exhibit 1, at page 6. Provide this same schedule, which is named GLT Form 1.5, showing forecasted projects for 2016.

8. Identify generally the locations of the major main replacements that have occurred in 2015 and describe how those specific projects were selected and prioritized.

  
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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED: NOV 25 2015

cc: Parties of Record

<sup>1</sup> Case No. 2012-00222, *Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Line, and Risers, and a Gas Line Surcharge* (Ky. PSC, Dec 20, 2012).

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