

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR)	CASE NO.
APPROVAL OF REVISED GAS LINE TRACKER)	2022-00056
RATES EFFECTIVE FOR SERVICES)	
RENDERED ON AND AFTER MAY 1, 2022)	

COMMISSION STAFF'S FIRST 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 an electronic version of the following information. The information requested is due on March 28, 2022. The Commission directs LG&E to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 LG&E obtains information that indicates 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, LG&E shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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 the Application, Exhibits 2–4. Provide an electronic version of these spreadsheets in Excel spreadsheet format with all formulas, row, and columns unprotected and fully accessible.
2. For each completed distribution project for which LG&E has recovered or is recovering its costs through its Gas Line Tracker (GLT) rates provide:
 - a. The date of completion;
 - b. The total number of mains, service lines, or risers that were replaced;

- c. The approximate number of miles of pipe associated with the completion;
 - d. The final cost of the project; and
 - e. A comparison of LG&E's projected cost and the final actual cost.
3. Confirm the Transmission Pipeline Modernization Program (TMP) approved in Case No. 2016-00371,² has been completed and provide:
 - a. The date of completion;
 - b. The approximate number of miles of pipe associated with the completion;
 - c. The final cost of the project; and
 - d. A comparison of LG&E's projected cost and the final actual cost.
4. If Item 3 cannot be confirmed, provide:
 - a. An estimated date of completion;
 - b. Estimated costs of completion;
 - c. Estimated number of miles of pipe associated with completion; and
 - d. A comparison of LG&E's original projected cost with its current projected cost of completion.
5. For the Steel Service Replacement Program approved in Case No. 2016-00371,³ provide:

² Case No. 2016-00371, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity* (Ky. PSC June 22, 2017), Order at 10.

³ *Id.*

- a. The number of steel service lines, county loops, and steel curbed services replaced to date;
- b. The number of steel service lines, county loops, and steel curbed services remaining to be replaced;
- c. The total cost of the project to date;
- d. The estimated total cost of completion; and
- e. A comparison of LG&E's original projected cost with its current projected cost of completion.

6. For the Customer Service Line Replacement project approved in Case No. 2012-00222,⁴ provide:

- a. The number of service lines replaced to date;
- b. The costs to date associated with the program; and
- c. The estimated number of customer-owned service lines still to be replaced.

7. Explain if LG&E has any future pipeline replacement plans.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAR 11 2022

cc: Parties of Record

⁴ 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 Lines and Risers and a Gas Line Surcharge* (Ky. PSC Dec. 20, 2012), Order at 5–6.

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