

**Commonwealth of Kentucky
Before the Public Service Commission**

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR A DECLARATORY)
ORDER REGARDING THE PROPER METHOD)
OF MUNICIPAL FRANCHISE FEE RECOVERY)

Case No.
2016-00137

Request for Information to

LG&E from

Louisville/Jefferson County Metro Government

Mike O'Connell v/p/d
GTD

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INSTRUCTIONS

- (1) Please identify the witness (es) who will be prepared to answer questions concerning each request.
- (2) Please repeat the question to which each response is intended to refer. An electronic version of these data requests can be provided, upon request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon. Those supplemental responses shall be provided as soon as the Company becomes aware of or in possession of the new or additional information.
- (4) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, 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.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (6) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available.
- (7) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.
- (8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.
- (9) Please provide all spreadsheets used in responses to these requests for information in excel format with all cells unlocked and functional.

Electronic Application of Louisville Gas and Electric Company for a Declaratory Order
Regarding the Proper Method of Municipal Franchise Fee Recovery
Case No. 2016-00317
Initial Discovery Requests of LG&E from Louisville Metro

- 1-1. Refer to the Direct Testimony of Bellar, page 5, and provide the results from the network analysis model used by LG&E that shows the directions of flow and all nullity points for LG&E's entire gas distribution system in Kentucky, whether that model is based on Synergee or another software product that performs the same function, for the following time periods:
 - a. The latest peak day, and
 - b. The latest base sendout day.
- 1-2. Please describe the engineering tool(s) and related software systems utilized by LG&E to properly size distribution pipe diameter for the Company's distribution and/or transmission systems.
- 1-3. Refer to the Direct Testimony of Bellar, page 11 at 18-20:
 - a. Identify the names of "the 83 incorporated municipalities in Jefferson County that are separate and apart from Louisville Metro". Please also indicate these cities on a revised version of Exhibit LEB-2, "List of Municipalities in Jefferson County."
 - b. Identify the citation to an official state or county government source upon which this statement is based.
- 1-4. For the 83 municipalities provided listed in the answer to question 3 above, provide
 - a. Whether they can negotiate their own individual franchise agreement with an electric, gas or combined electric and gas utility; and
 - b. What are the fees each municipality charges in its current franchise agreement with LG&E for use of each municipality's right of way.
- 1-5. Provide a list of all municipalities within LG&E Service territory and the franchise fee they currently charge. Additionally, provide:
 - a. Whether the fee is collected as a line item on the customer's bill.
 - b. The total fee collected annually.
 - c. The fee collected from the average customer.
- 1-6. In regards to the answer to question 5(a) above, where the fee is collected as a line item on the bill, is the fee structured to allow LG&E to collect the franchise fee as a dollar amount, a percentage of another part of the bill, or per therm or ccf used?
- 1-7. How does LG&E reconcile actual fees collected with the amount remanded to the municipalities, and when?

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- 1-8. Please confirm whether LG&E uses the Synergie software system for natural gas distribution system planning. If not, please identify the system that LG&E does use for distribution system planning. Did LG&E request approval to recover the cost of the associated license for this software system through rates in its latest rate case? What is the latest approved rate case that includes the cost of this license fee in the total amount to be recovered through rates?
- 1-9. Refer to the Direct Testimony of Bellar, page 7 at 5-7 and confirm whether the 2016 Franchise (agreement) is in effect today and LG&E is recovering the cost for it on current bills.
- 1-10. Refer to the Direct Testimony of Bellar, page 6 at 11-13, wherein Mr. Bellar states that the referenced maps affirmatively establish that all LG&E's gas customers *do not* receive their gas from distribution lines located within Louisville Metro's rights-of-way. Please confirm that neither do the referenced maps affirmatively establish that no LG&E's customers receive their gas from distribution lines located within Louisville Metro's rights-of-way.
- 1-11. Refer to Exhibit LEB-1, "LG&E's Gas System" (map) and identify and provide the receipt pressures for each of LG&E's city gate station interconnections ("Gas Take Points") with the interstate pipelines that interconnect with LG&E's Gas System.
- 1-12. Please provide the most recent schematic of LG&E's transmission and distribution system identifying all node points and the pressure at which gas received at the city gate station is injected into the Company's distribution system, for both the peak day and the base sendout.
- 1-13. Refer to Exhibit LEB-1, "LG&E's Gas System" (map) and identify and provide the maximum daily receipt obligations of the interstate pipelines that interconnect with LG&E's Gas System at each of the city gate stations ("Gas Take Points") shown on this map.
- 1-14. Refer to Exhibit LEB-1, "LG&E's Gas System" (map) and identify the local load areas or zones served by each of the city gate stations and their maximum and base loads in mcf per hour.
- 1-15. Refer to Mr. Bellar's testimony, page 5, lines 16 – 20 and explain if this statement means that it is Mr. Bellar's assertion that the interconnectivity of the distribution system and rights of way in many different communities provides benefits that allow gas customers in other communities to be served? If no such interconnectivity existed in the many different communities referenced by Mr. Bellar, what changes would LG&E have to make to its distribution system to provide service so that gas did not flow across county boundaries?