



December 26, 2003

Louisville Gas and Electric Company
East Operations Center
10300 Ballardsville Road
Louisville, Kentucky 40241

Mr. Eddie B. Smith
Manager, Gas Branch
Division of Engineering
Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
Frankfort, Kentucky 40601

RECEIVED

JAN 05 2004

**PUBLIC SERVICE
COMMISSION**

2004-00006

Re: Louisville Gas & Electric Company's Ballardsville Gas Transmission Pipeline

Dear Mr. Smith:

On December 9, 2003, the Louisville Gas and Electric Company completed replacing a total of 352 feet of a 26.5-mile gas transmission pipeline where creeks had eroded and exposed the pipeline in two locations. The pipeline segments were lowered utilizing Mueller bottom out line stopper fittings. This was done in order to comply with 49 CFR Part 192. 327 entitled "Cover". The Mueller bottom out line stopper fittings that were utilized are not designed to accommodate the passage of internal inspection devices as required in 49 CFR 192.150 entitled "Passage of Internal Inspection Devices".

The reasons the Mueller bottom out line stopper fittings were used are as follows:

- To correct the pipeline exposure in a timely manner and eliminate hazards associated with an exposed gas transmission line. LG&E has Mueller fittings and equipment in-house. However, LG&E does not possess the equipment necessary to tap fittings that can pass internal inspection devices. Contractors who do possess this equipment need to be scheduled several months in advance.
- The exposed pipeline has only a single feed and serves numerous gas distribution facilities. LG&E was required to use fittings and equipment that allowed the pipeline to be repaired without taking the pipeline out of service. Mueller fittings and equipment enable pipelines to be repaired without taking the pipelines out of service.
- The Ballardsville gas pipeline was constructed in 1965 prior to the implementation of 49 CFR Part 192. None of this pipeline was designed and constructed to accommodate the passage of instrumented internal inspection devices.

In accordance with 49 CFR 192.150 and 190.9, LG&E is petitioning for approval that the design and construction to accommodate the passage of instrumented internal inspection devices was impracticable for the small section of the Ballardsville gas transmission pipeline replaced for the reasons stated above.

If you have any questions regarding this matter, please do not hesitate to call me at (502) 333-1813 or Russell Cloyd, Senior Engineer, at (502) 333-1932.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph R. Ryan". The signature is fluid and cursive, with the first name "Joseph" being the most prominent part.

Joseph R. Ryan
Manager, Operating Policies & Standards
Louisville Gas and Electric Company