

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LOUISVILLE GAS & ELECTRIC)	
COMPANY)	
_____)	CASE NO.
)	2017-00119
)	
ALLEGED FAILURE TO COMPLY)	
WITH KRS 278.495, 807 KAR 5:022,)	
AND 49 C.F.R. PART 192)	

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

Louisville Gas & Electric Company ("LG&E"), pursuant to 807 KAR 5:001, shall file with the Commission the original and ten copies of the following information. The information requested herein is due no later than October 13, 2017. 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 the 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 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 LG&E's Responses to the requests for information listed in the Appendix to the Order entered May 18, 2017.

a. Provide an update to LG&E's response to Item 1 regarding mechanical coupling systems on the Ballardsville gas transmission pipeline system. Without limitation, this update should provide information regarding any additional mechanical coupling systems identified by LG&E on the Ballardsville pipeline system, including whether LG&E determined whether a mechanical coupling was installed on the 2-inch branch line referenced in LG&E's response to Item 1.a.

b. State whether LG&E performed, or caused to be performed, any testing or inspection of the mechanical coupling systems removed from the Ballardsville

natural gas transmission system, other than the one involved in the September 17, 2014 incident. If so, state whether such testing/inspection identified any defects in the coupling systems, as installed, and provide records and documentation of the testing/inspection.

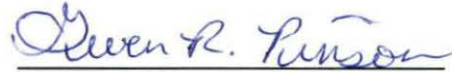
2. Provide a spreadsheet in electronic Excel format showing pressure records for the Ballardsville gas pipeline system for the period from installation of the coupling system involved in the September 17, 2016 incident through April 30, 2011, and state the total number of days during this period that the operating pressure of the Ballardsville pipeline system exceeded 300 psig.

3. Refer to the Commission Staff Incident Investigation Report dated September 17, 2017 ("Report"), which is attached as the Appendix to the Commission's March 15, 2017 Order in this case. Table 79.2 and Drawing Number 1319-A, which set forth requirements from LG&E's Gas Operating, Maintenance and Inspection Procedures ("GOM&I") for the installation of "harnessing" sections of pipe, are attached to the Report at Attachment C. Confirm that these requirements were in effect at the time the mechanical coupling system that failed on September 17, 2014, was installed. If these requirements were not then in effect, provide the manual of operating and maintenance procedures in effect at the time the coupling was installed.

4. Provide the written procedures for the installation of mechanical coupling systems that were in effect at the time LG&E installed each of the other mechanical couplings on the Ballardsville pipeline system.

5. Disclose the identity of each person LG&E intends to present as an opinion witness or expert witness at the formal hearing scheduled in this matter. For each such

person, provide a written report containing the information specified in Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

DATED: OCT 04 2017

cc: Parties of Record

Case No. 2017-00119

*Honorable Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Sara Veeneman
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Louisville Gas and Electric Company
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010