

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 POST-HEARING REQUEST FOR INFORMATION
TO LOUISVILLE GAS & 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 November 22, 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 Commission Staff's Second Request for Information at its response to Item 2. The response states that LG&E's initial review of records indicates that the operating pressure of the Ballardsville transmission pipeline exceeded 300 psig on 72 days from January 5, 1998, to April 30, 2011, but that as a result of anomalies in the data, the actual number of days may be less than 72. The response further states that LG&E is continuing to investigate this issue. Provide an update to this response. If the information in the response remains accurate and no supplementation is necessary, so state.

2. LG&E previously provided to the Commission the DOT Form PHMSA F 7100.2, dated October 17, 2014, by which LG&E reported the September 17, 2014

incident to the Pipeline and Hazardous Materials Safety Administration (“PHMSA”). Provide copies of all other reports relating to the incident that LG&E submitted to PHMSA pursuant to 49 C.F.R. Part 191.

3. Provide the written agreement pursuant to which Southern Pipeline employees performed the excavation work that exposed the mechanical coupling system that failed on September 17, 2014.

4. Regarding the Southern Pipeline employees who were injured as a result of the failure of the mechanical coupling system on September 17, 2014:

a. State whether either employee asserted a claim against LG&E for damages sustained as a result of the September 17, 2014 incident.

b. If either Southern Pipeline employee asserted a claim for damages against LG&E, state whether LG&E has satisfied or settled any such claims.

c. If LG&E has settled or resolved a claim asserted against it by either Southern Pipeline employee, describe the terms upon which the claim was resolved, and provide all agreements or releases relating to such claim.

5. Describe the policy and procedure by which LG&E inspects welds on transmission pipelines by X-ray, and state when LG&E implemented the policy to X-ray 100 percent of welds on its transmission system.

6. State whether leak surveys indicate a greater occurrence of leaks on pipelines joined by mechanical coupling system versus pipelines joined by welds.



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DATED NOV 15 2017

cc: Parties of Record

Case No. 2017-00119

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