

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR APPROVAL OF)	CASE NO.
REVISED RATES TO BE RECOVERED)	2018-00057
THROUGH ITS GAS LINE TRACKER)	

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 the original and an electronic version of the following information. The information requested herein is due on April 9, 2018. Responses to requests for information in paper medium 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 the Testimony of Lonnie E. Bellar in Case No. 2012-00222,¹ Bellar Exhibit 1, at page 6. Provide this same schedule, which is named GLT Form 1.5, showing forecasted projects for 2018.

2. Refer to the Application, paragraph 6.

a. Provide a detailed breakdown of the \$59.5 million dollar original estimate for the Transmission Pipeline Modernization Program (“TPMP”).

b. Provide a detailed breakdown of the revised \$82.1 million dollar current estimate for the TPMP.

¹ 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).

c. Provide a list showing how many miles of 16-inch diameter pipe will be replaced with 24-inch pipe, and how many miles of 20-inch pipe will be replaced with 24-inch pipe.

d. Confirm that LG&E's original TPMP cost estimate did not include the replacement of 20- and 16-inch pipeline with 24-inch pipeline, and that replacing with larger pipe is one of the reasons for the understatement of the cost of the program.

e. Explain why LG&E decided to make the change to replace with larger diameter pipe, and why this change was not included in the program as originally proposed.

f. Explain whether LG&E will be installing any pipe larger than 24 inches in diameter as part of the TPMP.

g. If not shown in part b. above, provide the cost of modernizing the valve nest.

3. Provide a copy of the Application in Excel format will all cells unprotected and all formulas intact.


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

DATED MAR 30 2018

cc: Parties of Record

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

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

*Rick E Lovekamp
Manager - Regulatory Affairs
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