

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE	)	
GAS AND ELECTRIC COMPANY FOR	)	
APPROVAL OF REVISED RATES TO BE	)	CASE NO.
RECOVERED THROUGH ITS GAS LINE	)	2020-00032
TRACKER BEGINNING WITH THE FIRST	)	
BILLING CYCLE FOR MAY 2020	)	

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 an electronic version of the following information. The information requested herein is due within ten days of the date of this request. The Commission directs LG&E to the Commission’s March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085,<sup>1</sup> regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 LG&E 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, LG&E 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 application, Exhibits 2, 3, and 4. Provide an electronic version of these spreadsheets in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible. Include any corrections and modifications that may occur as a result of the responses to the below questions. Be sure

to note all corrections made with a detailed explanation as to why the correction or modification was necessary.

2. Refer to the application Exhibit 4, pages 4–16 of 18. Page 4 of 18 is a summary of forecasted monthly capital and operating costs for 2020. On pages 5–16 of 18, column 6 contains monthly additions of plant. The Mains-Transmission Capex information listed on line 2 does not match the information contained in the monthly forecasts in column 6 on pages 5–14 of 18.

a. Provide an explanation, reconciliation, and updated Exhibit 4 with the correct information.

b. Provide the details and support for the proposed Mains-Transmission figure listed on line 2, column 6, pages 5–16 of 18.

c. Refer to pages 5–16 of 18. Provide an analysis of the Retirements, Total Plant, and Cost of Removal for each month.

3. Refer to Exhibit 4, page 17. Reconcile the columns 2017 Year 1 additions, 2018 Year 2 additions, and 2019 Year 3 additions with Exhibit 4, page 17, from Case No. 2019-00043.<sup>2</sup>

4. Refer to Exhibit 4, page 18, line 1, column 4, the 2020 Year 4 additions. The amount listed is \$44,456,281. Provide the source for this number. Also, provide the source for the adjacent cell of \$62,002,198, tax depreciation.

5. Identify generally the locations of the major main replacements that were made in 2019, the miles of line replaced, and describe how those specific locations and projects were selected and prioritized.

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<sup>2</sup> Case No. 2019-00043, *Electronic Application of Louisville Gas And Electric Company for Gas Line Tracker* (filed. Feb 28, 2019).

6. Identify generally the locations of the major main replacements that are going to be made in 2020, provide the proposed miles of line to be replaced, and describe how those specific locations and projects will be prioritized.

7. State how many gas risers LG&E has replaced to date, and state how many riser replacements LG&E estimates remain. Explain the \$18,480 Cost of Removal shown for Risers in Exhibit 4.

8. Provide how many miles of main replacements, service line replacements, and customer service replacements LG&E projects there will be left to replace through the Gas Line Tracker (GLT) by the end of 2020.

9. Provide an analysis as to whether LG&E projects it will complete its main replacements, service line replacements, and customer service replacements according to the original schedule as may have been approved in Case No. 2016-00371<sup>3</sup> and subsequently updated in Case No. 2018-00295,<sup>4</sup> and compare its current projections of the total cost of its GLT program as originally approved and amended.

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<sup>3</sup> Case No. 2016-00371, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric And Gas Rates and for Certificates of Public Convenience and Necessity*, (Ky. PSC. June 22, 2017).

<sup>4</sup> Case No. 2018-00295, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric And Gas Rates*, (Ky. PSC Apr. 30, 2019).



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DATED APR 07 2020

cc: Parties of Record

Case No. 2020-00032

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