

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR A)	CASE NO.
CERTIFICATE OF PUBLIC CONVENIENCE)	2017-00195
AND NECESSITY FOR THE CONSTRUCTION)	
OF AN ELECTRIC TRANSMISSION LINE)	

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 with six copies in paper medium and an electronic version of the following information. The information requested herein is due within nine days of the date of this request. 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 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 the personal information cannot be read.

1. Refer to the Application, page 6, which requests that an Order be issued by September 15, 2017. Explain why LG&E requested a decision by September 15, 2017, and how the proposed project would be affected if LG&E has not received a decision by the requested date.

2. Refer to the Application, page 2, footnote 1, regarding the relocation of a gas transmission line that is also located on Waste Management's property.

a. Explain why LG&E did not request a declaratory ruling regarding whether the relocation of the gas transmission line would be exempt under the ordinary course of business exemption set forth in 807 KAR 5:001, Section 15(3).

b. Explain in specific detail the basis for LG&E's assertion that a CPCN is not required for the relocation of the gas transmission line.

c. Explain why LG&E has requested a CPCN for the relocation of the electric transmission line, but has not requested a CPCN for the gas transmission line.

d. Explain in specific detail the basis for LG&E's decision to increase the diameter of the gas pipe located at the Outer Loop Landfill that is being relocated.

3. Provide a schedule with the total capital cost to construct and relocate the gas transmission line, broken out by cost component.

4. Refer to the Application, page 4, which states that the relocated line will be “tied in with the main circuit during a period of low demand.” State whether the tie-in process will interrupt electric service to customers other than Waste Management, and if so, what type of notice will be given to the affected customers.

5. Refer to the Application, page 5, which states that Waste Management will fund the project costs, with the exception of the taxes LG&E will pay on Waste Management’s contributions.

a. Provide a schedule with the total cost of the project, broken out by cost component.

b. Provide the monetary amount of taxes that LG&E will have to pay on Waste Management’s contributions, and explain how it will affect LG&E’s rates.

c. LG&E states that it may offset a portion or all of the tax payments through future tax savings through depreciation during the following 20 years. Provide a detailed explanation of the criteria LG&E will rely upon when deciding whether to offset all or a portion of the tax payments.

6. Refer to the Application, page 5, which states that the annual cost of operation is anticipated to be *de minimis*. Provide the estimated annual cost of operation of the proposed transmission line and the annual cost of operation for the current transmission line.

7. Refer to the Application, page 3, which states that an alternate route on a portion of land designated as wetlands was rejected, in part, because of the increased

environmental risks and permitting challenges resulting from a larger footprint in the wetlands. Also refer to the Application, Exhibit 6, a permit issued by the U.S. Army Corps of Engineers to “expand an existing landfill by filling 66 acres of wetlands and relocating 1600 linear feet of Wet Woods Creek.” Reconcile the statement on page 3 of the Application with the permit granted in Exhibit 6.

8. Refer to the Application, Exhibit 5. The Kentucky Pollutant Discharge Elimination System (“KPDES”) permit expired on May 31, 2017. Provide an updated KPDES permit, or a detailed explanation as to why an updated permit is not available.

9. Refer to the Application, Exhibit 7, page 33 of 34. Confirm that LG&E has no liability for wetland mitigation related to its easements on Waste Management’s property. If this cannot be confirmed, fully describe the nature and circumstances of LG&E’s liability.

10. Refer to the Application, Exhibit 10. Explain whether future landfill expansions will require subsequent relocation of LG&E’s electric distribution line from the proposed route.



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Public Service Commission
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DATED JUL 17 2017

cc: Parties of Record

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