

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR APPROVAL OF STATE)	
WAIVER OF THE REASSESSMENT)	CASE NO. 2016-00386
INTERVAL REQUIRED BY 49 C.F.R. § 192.939)	

COMMENTS OF
LOUISVILLE GAS AND ELECTRIC COMPANY IN RESPONSE
TO THE COMMISSION'S ORDER OF APRIL 21, 2017

Louisville Gas and Electric Company (“LG&E”), pursuant to the Commission’s April 21, 2017 Order in this proceeding, hereby submits its final comments regarding its application for approval of the waiver requested in this matter. LG&E appreciates the time and effort of Commission Staff in this proceeding, and believes the following comments and additional information will enhance the record in this matter.

I. In Line Inspection of High Consequence Areas is Underway

LG&E is in the process of completing an in line inspection (“ILI”) of 17 miles of the 12-inch diameter portion of the Ballardsville Pipeline at issue in this matter. The inspection is expected to be completed May 1, 2017. That inspection includes all of the approximate 4-1/4 miles of pipeline in high consequence areas (“HCA”s). As such, LG&E’s inspection of the relevant HCAs will be deemed complete as defined in the applicable regulation. However, the data from the ILI will not be available for approximately two months, and LG&E will not know until that time whether valid data was collected during the ILI.

II. LG&E’s Requested Waiver Remains Necessary

LG&E’s requested waiver remains necessary. The original regulatory deadline that was the subject of LG&E’s application was December 31, 2016. LG&E expects to complete the

requisite inspection on May 1, 2017. However, given the approximately two months required to determine if valid data was collected during LG&E's ILI of the pipeline at issue, and the potential need to react appropriately to that data—including, but not limited to, scheduling and conducting another ILI of the pipeline if the data is not valid—LG&E maintains its request for a waiver as set forth in its application that it be permitted to conduct the inspection prior to August 31, 2018. If another ILI is required due to the invalidity of the data collected recently, scheduling issues and tool availability may prohibit the inspection prior to the heating season and, therefore, prevent the inspection in order to maintain product supply prior to the Spring of 2018.

III. This Matter Should Stand Submitted For A Decision

With the addition of the comments set forth herein, LG&E does not request a hearing in this matter to further supplement the record and therefore requests that it stand submitted for a decision.

IV. Conclusion

Again, LG&E appreciates the hard work of the Commission Staff in this matter. It offers the comments and additional information set forth here in the interest of informing the Commission Staff of factual developments regarding the pipeline at issue and enhancing the accuracy of the record.

Dated: May 1, 2017

Respectfully submitted,

/s/ J. Gregory Cornett

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CERTIFICATE OF SERVICE

This is to certify that Louisville Gas and Electric Company's May 1, 2017 electronic filing of its Comments is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on May 1, 2017; that there are currently no other parties in this case; and that an original and one copy in paper medium of the Comments will be hand delivered to the Commission within two business days.

/s/ J. Gregory Cornett

Counsel for Louisville Gas and Electric Company