COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	**)**	
LOUISVILLE GAS AND ELECTRIC	**)**	**CASE NO. 2019-00301**
COMPANY FOR AN AMENDED	**)**	
GAS LINE TRACKER	**)**	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS
DATED NOVEMBER 15, 2019

FILED: DECEMBER 6, 2019

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Peter Clyde**, being duly sworn, deposes and says that he is Manager Transmission Integrity and Compliance for Louisville Gas and Electric Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Peter Clyde

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 6th day of December 2019.

Notary Public (SEAL)

My Commission Expires:

Judy Schooler
Notary Public, ID No. 603967
State at Large, Kentucky
Commission Expires 7/11/2022

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Attorney General's Supplemental Data Requests
Dated November 15, 2019

Case No. 2019-00301

Question No. 1

Witness: Peter J. Clyde

Q-1. Reference Case No. 2018-00348, the LG&E-KU response to AG 1-1 in which the Companies stated, in pertinent part, "Enhanced inline inspection ["ILI"] technologies cannot be used in the Ballardsville pipeline due to pipeline characteristics and pressure restrictions on the pipeline."

a. Explain whether there are any other pipelines or segments thereof in which ILI technologies cannot be used. If so, explain also why ILIs cannot be used, and identify the means by which inspections will be conducted.

A-1. a. A 2018 year end review identified 103 miles of gas transmission pipe in LG&E's system not able to be inspected by ILI. Much of this pipe is in storage fields or compressor stations which are not conducive for ILI due to there being numerous short branch connections. Other locations are pipelines which have not been upgraded to permit ILI by replacing valves, installing launchers and receivers, and making any other needed pipeline modifications. Some of the 103 miles, and some additional pipe, will not have adequate flow rates to move some or all ILI tools at the required speeds. Some pipe currently designated as able to be inspected by ILI based on historic ILI technologies deployed in the line may require further modification to allow additional ILI technologies to be used. Where appropriate, LG&E will evaluate on a case by case basis the appropriate path forward.

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Question No. 2

Witness: Peter J. Clyde

Q-2. Explain whether PHMSA's pending Safety of Gas Transmission and Gathering Pipelines regulation ["SGTGP"], and/or any other PHMSA regulation whether in draft or final versions, mandate specific types of inspection techniques for transmission and/or distribution pipelines, and service lines under any particular circumstances.

a. Provide a discussion regarding whether the SGTGP, and/or any other PHMSA regulations, allow a pipeline operator discretion as to which inspection technique(s) to deploy. Include in the discussion any advantages/disadvantages to using one technique over any other.

b. Provide copies of any studies, including any cost-benefit analyses the Company may have conducted regarding costs and benefits for various types of inspection techniques.

A-2. See the response to AG 1-1 for the requested explanation and the response to part a below.

a. See the response to AG 1-1 for a discussion of the inspection techniques permitted and the advantages/disadvantages of the techniques. The response is focused on transmission lines since PHMSA has not issued equivalent regulatory inspection mandates for distribution lines or service lines.

b. See the response to AG 1-1 for a discussion of the cost-benefit of inspection techniques. See the response to PSC 1-12 for the replacement alternative cost-benefit analysis.

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Question No. 3

Witness: Peter J. Clyde

Q-3. Reference the response to AG 1-1 (a) in the instant case. Explain whether under 49 CFR § 192.624 (MAOP Reconfirmation) the same techniques / technology can be utilized for HCAs and MCAs as are allowed under 49 CFR §§ 192.921 and 192.710.

a. Based on LG&E's response, is it correct to conclude that the Company will be utilizing "an expanded set of technologies," and not relying exclusively on ILIs to achieve compliance with these regulations?

A-3.

a. The techniques/technologies can be deployed as follows.
   - The ILI technologies used under 192.624 (MAOP reconfirmation) can also be used for 192.921 (HCA integrity assessments), 192.710 (assessments outside of HCA), and 192.607 (material verification).
   - Pressure tests permitted under 192.624 (MAOP reconfirmation) can also be used for 192.921 (HCA integrity assessments) and 192.710 (assessments outside of HCA), but would not satisfy the requirements of 192.607 (material verification). In addition, pressure testing is not cost effective as discussed in AG 1-1, may require interruption of service to customers, and does not provide quantitative data on the condition of the pipeline.
   - Pressure reduction permitted under 192.624 (MAOP reconfirmation) could not be used for 192.921 (HCA integrity assessments), 192.710 (assessments outside of HCA), or 192.607 (material verification). A pressure reduction would also inhibit the Company's ability to meet customer load requirements and the Company would lose system reliablility in winter periods. In addition, reducing pressure does not provide quantitative data on the condition of the pipeline.
   - Pipe replacement permitted under 192.624 (MAOP reconfirmation) could be used for 192.921 (HCA integrity assessments) and 192.710 (assessments outside of HCA) on an ongoing basis if the pipe is repeatedly replaced over and over again. Pipe replacement could be used for 192.607 (material verification).

   LG&E expects to rely predominantly on ILI and follow up inditch examinations to achieve compliance with these regulations.

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Question No. 4

Witness: Peter J. Clyde

Q-4. Reference the response to PSC 1-12. Clarify whether the tool actually chosen and under development will be able to gather data in the 20-inch pipe segments. If so, when and under what circumstances?

A-4. The tools under development are being designed to be able to collect data on the 20-inch segments referenced in the response to PSC 1-12 under the conditions in which the segments are operated in LG&E's system.