

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

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

**ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Data Requests to Louisville Gas & Electric Company [hereinafter “LG&E” or “the Company”] to be answered by the date specified in the Commission’s Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for LG&E with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or

otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or

transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



LAWRENCE W. COOK  
JUSTIN M. McNEIL  
ASSISTANT ATTORNEYS GENERAL  
700 CAPITOL AVE., SUITE 20  
FRANKFORT KY 40601  
(502) 696-5453  
FAX: (502) 564-2698  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Justin.McNeil@ky.gov](mailto:Justin.McNeil@ky.gov)

*Certificate of Service and Filing*

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on November 15, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 15<sup>th</sup> day of November, 2019



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Assistant Attorney General

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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.
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.
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?
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?