

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 INITIAL 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 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



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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 October 17, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 17th day of October, 2019



Assistant Attorney General

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1. Reference the Application, generally.
 - a. Cite any applicable PHMSA or other regulatory requirement mandating the use of inline inspections for gas pipeline assessments.
 - b. How has LG&E previously performed assessments for the line segments at issue in this case?
 - c. How does LG&E perform assessments for other non-uniform diameter pipelines in its system?
 - d. Provide the number and length of multi-diameter pipelines in LG&E's system.

2. Reference the Direct Testimony of John P. Malloy ("Malloy Direct") at 3, wherein he states that "ILIs are an excellent way of thoroughly and timely assessing pipe in a non-destructive manner."
 - a. Provide the other approved ways of assessing pipelines. Any response should differentiate assessment methodologies approved for Moderate Consequence Areas and High Consequence Areas ("HCA"s) as those terms are used by PHMSA.

3. With regard to the multi-diameter tool to be constructed by Rosen USA for the purpose of performing in-line inspections ("ILI"s):
 - a. Provide the tool's total projected cost.
 - b. Will the Company own the tool, or will Rosen USA? If the Company will own it, will the Company's personnel always perform the proposed ILIs, or will Rosen USA personnel?
 - a. Provide the tool's expected lifespan. If the Company will own the tool, explain the Company's anticipated depreciation treatment of the tool.
 - b. Refer to the Direct Testimony of Robert M. Conroy("Conroy Direct"), at 5. Explain why a cost for the tool is provided for the years 2020-2021, but not any other years. Explain whether additional costs will be incurred in later years, and if so, identify those costs and the reasons therefor.
 - c. Explain whether the Company engaged in an RFP process for the acquisition of the multi-diameter tool. If so, provide the results of the RFP.
 - d. Provide a breakdown of each item of projected O&M costs (incremental/recurring and one-time) associated with the multi-diameter tool.
 - e. Refernce Conroy Direct, at 5, lines 10-11. Explain why the Company will have to pay Rosen USA additional O&M expense for its development of the tool.

- f. Identify any and all other costs associated with the development, construction, deployment, operation and ownership of the multi-diameter tool for which the Company will be responsible.
4. Explain whether the multi-diameter tool can appropriately be referred to as a smart pig. If so, identify the types of ILI inspections it will be capable of performing.
 - a. State whether the multi-diameter tool is capable of performing multiple analyses simultaneously.
 - b. Explain also whether multiple runs of the multi-diameter tool may be required to perform some types of analyses.
5. Reference Malloy Direct, generally. Explain whether the Company has developed an all-in operating cost basis for use of the multi-diameter tool which includes crew labor, O&M, etc. State whether costs were developed on a time-of-use basis (whether by hour or day), distance (whether in feet, or meters), or some other basis.
6. Reference Malloy Direct, generally. Provide a discussion of the process by which the Company decided that ILIs, in general, were the most cost-effective means of meeting compliance with all regulatory requirements at issue in this filing, as opposed to pressure testing, direct assessment, or other technologies.
 - a. Refer also to Exhibit JPM-1, Executive Summary, wherein it is stated that the Company “has considered various alternatives in assessing the safety, integrity, and reliability of several of [its] gas pipelines. . . .” Identify all other options which the Company considered in lieu of ILIs, including any alternatives that may not be identified in Exhibit JPM-1. Provide any cost-benefit analyses performed with regard to all such alternatives.
 - b. Provide an additional discussion of the process by which the Company decided that the use of the proposed multi-diameter tool was the least-cost means of conducting the ILIs.
7. Reference Malloy Direct, generally. Explain whether the multi-diameter tool could be used to conduct future ILIs in other 16-inch and 20-inch pipe segments not identified in the current filing.
8. Reference Malloy Direct, at 3, wherein he states, “However, ILI tools with the enhanced inspection technologies are not currently available for pipelines of varying diameter with operating characteristics such as those in the Western Kentucky A and

B pipelines and other lines in the LG&E's gas transmission system." Explain whether this statement excludes or includes the proposed multi-diameter tool.

9. Reference Malloy Direct, at 3-4. Explain how the multi-diameter tool will be able to avoid the problem of speed excursions.
 - a. Explain how the Company will be able to determine whether a speed excursion, and any resulting data gaps has or have occurred when the multi-diameter tool is passing through a transition point from a 16-inch pipe to a 20-inch pipe, and vice versa.
10. Assuming the Commission approves the instant application, explain whether any of the Company's remaining 22-inch pipes will require ILIs or other types of inspections prior to being replaced.
11. Explain whether any of the proposed pipe replacement projects are located in areas that are HCAs.