

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF LOUISVILLE</b>	)	
<b>GAS AND ELECTRIC COMPANY FOR</b>	)	<b>CASE NO.</b>
<b>MODIFICATION OF ITS PERFORMANCE-BASED</b>	)	<b>2021-00028</b>
<b>RATEMAKING MECHANISM</b>	)	

**SEPTEMBER 30, 2021 SUPPLEMENTAL RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**TO**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**  
**DATED MARCH 3, 2021**

**FILED: SEPTEMBER 30, 2021**



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**September 30, 2021 Supplemental Response to Commission Staff's  
First Request for Information  
Dated March 3, 2021**

**Case No. 2021-00028**

**Question No. 2**

**Witness: Pamela L. Jaynes**

Q-2. Refer to LG&E's responses to Commission Staff's First Request for Information, Item 16, in Case No. 2019-00437 regarding LG&E's gas procurement methodology. Provide all updates to the information requested in Item 16 of that request for information through the date of this request and on a continuing basis during the pendency of this case.

A-2. **March 17, 2021 Original Response:**

For the sake of clarity and ease of reference, LG&E has repeated the 14 subparts from Question No. 16 in summary form and responds to those 14 subparts accordingly with any changes that have occurred since LG&E's response dated February 21, 2020.

- a. Provide copies of all interstate pipeline transportation and storage contracts entered into and tariffs effective since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information dated February 6, 2020, in Case No. 2019-00437.
- b. Provide copies of all contracts for commodity supply entered into since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information dated February 6, 2020, in Case No. 2019-00437.
- c. Provide any updates to gas supply and capacity contract summaries showing significant contract terms; daily, monthly, and annual entitlements; and pricing for contracts entered into since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437. Identify capacity changes (renegotiated and expired agreements, contract cancellations, assignments, or long-term releases) that have occurred since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.
- d. Provide any updates to LG&E's storage arrangements, and state the maximum daily injection and withdrawal rates and the decline in deliverability that occurs as gas is withdrawn, updated to reflect any changes since LG&E's February 21, 2020, response

to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.

- e. Provide any updates to peaking arrangements made since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.
- f. Provide a copy of all written procedures in use by LG&E for nominations and dispatching that have changed since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.
- g. If LG&E has utilized gas marketing/trading organizations to obtain gas supplies since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437, indicate which organizations were employed, gas volumes purchased, prices, terms, and current contractual arrangements between LG&E and these marketing firms.
- h. Provide any changes to the Request for Proposal or bidding process for gas supply that have changed since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437; for the same period provide the original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, the evaluation process that led to the selection of a supplier, and any written procedures that exist for this activity.
- i. Provide a copy of LG&E's gas supply plan and a written description of its gas supply planning process made since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.
- j. Provide any changes to any supply-planning computer models currently being used by LG&E since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.
- k. Provide organization charts of the overall corporate organization and of the gas planning, gas purchasing, and gas operations functions that have changed since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437. Describe any changes that have occurred in the corporate, gas planning and purchasing, and gas operations organizations since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.
- l. Provide any updates to job descriptions of the personnel working in the gas planning, gas purchasing, and gas operating functions since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.

- m. Provide copies of reports or internal audits or reviews of any aspect of the supply function conducted since Staff's gas procurement methodology request since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437. Include reports prepared by LG&E and outside auditors.
- n. Provide an updated copy of LG&E's strategic plan with primary emphasis on gas procurement, transmission, delivery, and expansion, including all significant related capital expenditures that has been prepared since LG&E's February 21, 2020, response to Question No. 16 from Commission Staff's First Request for Information in Case No. 2019-00437.

LG&E's responses to the above questions have been updated through February 28, 2021 below. As needed, quarterly updates will be provided hereafter through the pendency of this proceeding which will be filed with the Commission within thirty (30) days of the close of the applicable three-month period.

- a. For gas supply activity covering the most recent gas contract year (12 months ended October 31, 2020), the capacity contracts with interstate pipelines under Rates NNS, FT, and FT-A are the same as those referenced in LG&E's response dated February 21, 2020 to Commission Staff's Question No. 16(a) from Case No. 2019-00437. Those pipeline capacity contracts have not experienced any change for the contract year beginning November 1, 2020.

While there have been no changes to the terms and conditions of these transportation arrangements since that response, the "8-year" NNS contract that was subject to termination October 31, 2021, has been extended for an additional 5-year roll-over term through October 31, 2026. No new contractual documents were required to be executed.

**The following updated information has been included as attachments to this response:**

- Texas Gas Transmission, LLC Tariff Sheets:
  - Fuel Retention Percentages for Service under Rate Schedules NNS and FT (applicable to service from November 1, 2019 through June 30, 2020; from July 1 through October 31, 2020; and beginning November 1, 2020)
- Tennessee Gas Pipeline Company, LLC Tariff Sheets:
  - Rates for Service under Rate Schedule FT-A (applicable to service from November 1, 2019 through October 31, 2020 and beginning November 1, 2020)

- Fuel Retention Percentages for Service under Rate Schedule FT-A (applicable to service from April 1, 2020 through March 31, 2021 and beginning April 1, 2021)
- b. Attached are copies of the following documents with respect to LG&E's contracts for gas commodity supply in effect from November 1, 2019 through February 28, 2021. These documents include the following:
  - all new base forms of agreement under which LG&E was able to purchase gas supplies effective since LG&E's February 21, 2020 filing in Case No. 2019-00437; these base forms of agreement set forth the framework for a potential gas commodity transaction such as billing, payment, title transfer, etc., but do not include the specifics with respect to a particular transaction such as price, volume, or duration (term)
  - base forms of agreement under which LG&E was able to purchase gas supplies have been terminated since LG&E's February 21, 2020 filing in Case No. 2019-00437, of which there are none
  - a summary of the key terms and conditions of the gas supply commodity transactions in effect from November 1, 2019 through February 28, 2021 taken from the below referenced Nomination Schedules
  - all Nomination Schedules in effect from November 1, 2019 through February 28, 2021, which reference and are Exhibits to the above base forms of agreement which memorialize gas supply transactions, including the specifics of each transaction with respect to price, volume, and duration (term), but excluding transactions for a single day or weekend

As with the inquiry conducted in Case No. 2019-00437, LG&E has not included Nomination Schedules associated with the purchase of any daily gas supplies simply because they are voluminous. However, any updates to the bid solicitations and the awards associated with each daily purchase are provided in the response to Question No. 1-2(h). These purchases are made under the same base forms of agreements provided herewith and in order to satisfy either daily changes in load requirements or to optimize LG&E's gas supply portfolio as discussed, for example, in any updates to the response to Question No. 1-2(f).

**The following updated information has been included as attachments to this response subject to a Petition for Confidential Treatment:**

- Annual Supply Statistics for: November 1, 2019 through October 31, 2020 and from November 1, 2020 through February 28, 2021

- A copy of all new base forms of agreement and contractual documentation reflecting name changes and assignments effective since LG&E's February 21, 2020 filing in Case No. 2019-00437
  - A summary of all transactions in effect from November 1, 2019 through February 28, 2021 (excluding transactions lasting only a single day or weekend)
  - The Nomination Schedules for each of the transactions from November 1, 2019 through February 28, 2021 (excluding transactions lasting only a single day or weekend)
- c. LG&E's response to Question No. 1-2(a) includes any updates to capacity changes (renegotiated and expired agreements, de-contracting, assignment, or long-term release) that have taken place since February 21, 2020.

LG&E's response to Question No. 1-2(b) includes a discussion of any updates to significant contract terms, daily/monthly/annual entitlements, and pricing.

- d. LG&E's off-system storage arrangements are made under Texas Gas's No-Notice Service ("NNS") which is a bundled service that includes pipeline transportation capacity and storage service. There have been no changes to these arrangements since February 21, 2020.

Parameters associated with LG&E's on-system storage are included with the 2020 Annual Gas Supply Plan provided in the response to Question No. 1-2(i). Specifically, LG&E's on-system storage injection parameters can be found in Exhibit V of Exhibit 4 of the 2020 Annual Gas Supply Plan, and LG&E's on-system withdrawal parameters can be found in Exhibit V of Exhibit 4 of the 2020 Annual Gas Supply Plan.

- e. Updated information with respect to storage facilities, pipeline transportation services and gas supply agreements have been identified in the responses to Questions Nos. 1-2(a), 1-2(b), 1-2(c), and 1-2(d).
- f. No changes to the written procedures previously submitted on February 21, 2020 in Case No. 2019-00437.
- g. There has been no change in the information submitted by LG&E since its response dated February 21, 2020 in Case No 2019-00437. LG&E's gas supply arrangements (which may include arrangements with both producers and marketers) are discussed in the response to Question Nos. 1-2(a), 1-2(b) and 1-2(c).
- h. The following written procedure has been modified since the previous submission dated February 21, 2020 in Case No 2019-00437:
- Section 2.15: "Supplier Credit Assessment and Daily Net Exposure"

Also, attached are copies of LG&E's gas commodity supply solicitations conducted between November 1, 2019 and February 28, 2021. The documentation is provided in the date order of the bid release. These documents include a copy of the original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, and the evaluation process that led to the selection of a supplier. The longer-term bid solicitations associated with the 2020 Annual Gas Supply Plan (including copies of original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, and the evaluation process that led to the selection of a supplier) are included with LG&E's 2020 Annual Gas Supply Plan provided as a part of the response to Question No. 1-2(i).

**The following information has been included as an attachment to this response subject to a Petition for Confidential Treatment:**

- Section 2.15: "Supplier Credit Assessment and Daily Net Exposure"; original submission dated July 1, 2020, superseding the version dated August 1, 2019, which was provided on February 21, 2020
  - Bid documentation for gas commodity supply solicitations conducted between November 1, 2019 and February 28, 2021
- i. LG&E's 2020 Annual Gas Supply Strategies ("Gas Supply Plan") was prepared by the Gas Management, Planning, and Supply Department. Exhibit 1 to the 2020 Annual Gas Supply Plan includes the "Summary of Bid Evaluations for Natural Gas Supply Transactions (2020 Gas Supply Plan)" including the Bid Evaluation (Appendix A), Bid Invitation (Appendix B), list of suppliers invited to bid (Appendix C), bids provided by suppliers (Appendix D), and Bid Evaluation Methodology (Appendix E).

While the Annual Gas Supply Plan develops details for the upcoming year, it is primarily focused on deliveries for the upcoming winter season. The Summer Plan is more closely focused on summer season purchases which are primarily used for storage refill. The 2020 Summer Purchase Plan Analysis is also included.

**The following information has been included as attachments to this response subject to Petition for Confidential Treatment:**

- 2020 Annual Gas Supply Plan (including 2020 bid documentation)
  - 2020 Summer Purchase Plan Analysis
- j. No change.
- k. Beginning in 2020, a new Director – Asset Integrity Management & Compliance was created. There have been no other changes. See attached organizational chart.
- l. No change.



- m. No change.
- n. See attached.

**June 25, 2021 Supplemental Response:**

In its First Request for Information in Case No. 2021-00028 dated March 3, 2021, the Commission Staff requested updates to Question No. 2 of that Request for Information through the pendency of the case.

LG&E's responses to the below questions have now been updated for March 1, 2021, through May 31, 2021; the next quarterly update will cover June 1 through August 31 and be filed on or before September 30 assuming the case is still pending.

For the sake of clarity and ease of reference, LG&E has repeated the 14 subparts in summary form and responds to those 14 subparts accordingly with any changes that have occurred since LG&E's response dated March 17, 2021.

- a. Provide copies of all interstate pipeline transportation and storage contracts entered into and tariffs effective since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information dated March 3, 2021, in Case No. 2021-00028.
- b. Provide copies of all contracts for commodity supply entered into since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information dated March 3, 2021, in Case No. 2021-00028.
- c. Provide any updates to gas supply and capacity contract summaries showing significant contract terms; daily, monthly, and annual entitlements; and pricing for contracts entered into since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028. Identify capacity changes (renegotiated and expired agreements, contract cancellations, assignments, or long-term releases) that have occurred since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- d. Provide any updates to LG&E's storage arrangements, and state the maximum daily injection and withdrawal rates and the decline in deliverability that occurs as gas is withdrawn, updated to reflect any changes since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.

- e. Provide any updates to peaking arrangements made since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- f. Provide a copy of all written procedures in use by LG&E for nominations and dispatching that have changed since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- g. If LG&E has utilized gas marketing/trading organizations to obtain gas supplies since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028, indicate which organizations were employed, gas volumes purchased, prices, terms, and current contractual arrangements between LG&E and these marketing firms.
- h. Provide any changes to the Request for Proposal or bidding process for gas supply that have changed since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028; for the same period provide the original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, the evaluation process that led to the selection of a supplier, and any written procedures that exist for this activity.
- i. Provide a copy of LG&E's gas supply plan and a written description of its gas supply planning process made since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- j. Provide any changes to any supply-planning computer models currently being used by LG&E since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- k. Provide organization charts of the overall corporate organization and of the gas planning, gas purchasing, and gas operations functions that have changed since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028. Describe any changes that have occurred in the corporate, gas planning and purchasing, and gas operations organizations since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- l. Provide any updates to job descriptions of the personnel working in the gas planning, gas purchasing, and gas operating functions since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- m. Provide copies of reports or internal audits or reviews of any aspect of the supply function conducted since Staff's gas procurement methodology request since LG&E's

March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028. Include reports prepared by LG&E and outside auditors.

- n. Provide an updated copy of LG&E's strategic plan with primary emphasis on gas procurement, transmission, delivery, and expansion, including all significant related capital expenditures that has been prepared since LG&E's March 17, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.

Please see LG&E's supplemental responses below:

- a. There have been no changes since the previous response.
- b. There have been no changes since the previous response except as follows:
  - A summary of the key terms and conditions of the new gas supply commodity transactions entered into between March 1, 2021, through May 31, 2021, taken from the below referenced Nomination Schedules.
  - All Nomination Schedules entered into between March 1, 2021, through May 31, 2021, which reference and are Exhibits to the base forms of agreement which memorialize gas supply transactions, including the specifics of each transaction with respect to price, volume, and duration (term), but excluding transactions for a single day or weekend.

As with the inquiry conducted in Case No. 2021-00028, LG&E has not included Nomination Schedules associated with the purchase of any daily gas supplies. However, any updates to the bid solicitations and the awards associated with each daily purchase are provided in LG&E's response to part (h) of this response. These purchases are made under the base forms of agreements previously provided and in order to satisfy either daily changes in load requirements or to optimize LG&E's gas supply portfolio as discussed, for example, in any updates to LG&E's response to part (f) of this response.

**The following updated information has been included as attachments to this response subject to the Petition for Confidential Treatment filed with the original response:**

- Annual Supply Statistics for: November 1, 2020, through May 31, 2021.
- A summary of all transactions entered into between March 1, 2021, through May 31, 2021, (excluding transactions lasting only a single day or weekend).

- The Nomination Schedules for each of the transactions entered into between March 1, 2021, through May 31, 2021, (excluding transactions lasting only a single day or weekend).
- c. There have been no changes since the previous response.
  - d. There have been no changes since the previous response.
  - e. There have been no changes since the previous response.
  - f. There have been no changes since the previous response.
  - g. There have been no changes since the previous response.
  - h. Attached are copies of LG&E's gas commodity supply solicitations conducted between March 1, 2021, and May 31, 2021.

**The following information has been included as an attachment to this response subject to the above-referenced Petition for Confidential Treatment:**

- Bid documentation for gas commodity supply solicitations completed between March 1, 2021, and May 31, 2021.
- i. There have been no changes since the previous response.
  - j. There have been no changes since the previous response.
  - k. Effective May 31, 2021, Pam Jaynes has been promoted to Director—Gas Management Planning and Supply. See attached organizational chart.
  - l. There have been no changes since the previous response.
  - m. There have been no changes since the previous response.
  - n. There have been no changes since the previous response.

**September 30, 2021 Supplemental Response:**

In its First Request for Information in Case No. 2021-00028 dated March 3, 2021, the Commission Staff requested updates to Question No. 2 of that Request for Information through the pendency of the case.

On June 25, 2021, LG&E's original responses were updated for March 1, 2021 through May 31, 2021.

LG&E's responses to the questions below are now updated for June 1, 2021, through August 31, 2021; the next quarterly update will cover September 1, 2021 through November 30, 2021 and be filed on or before December 31, 2021 if the case is still pending.

For the sake of clarity and ease of reference, LG&E has repeated the 14 subparts in summary form and responds to those 14 subparts accordingly with any changes that have occurred since LG&E's response dated June 25, 2021.

- a. Provide copies of all interstate pipeline transportation and storage contracts entered into and tariffs effective since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information dated March 3, 2021, in Case No. 2021-00028.
- b. Provide copies of all contracts for commodity supply entered into since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information dated March 3, 2021, in Case No. 2021-00028.
- c. Provide any updates to gas supply and capacity contract summaries showing significant contract terms; daily, monthly, and annual entitlements; and pricing for contracts entered into since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028. Identify capacity changes (renegotiated and expired agreements, contract cancellations, assignments, or long-term releases) that have occurred since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- d. Provide any updates to LG&E's storage arrangements, and state the maximum daily injection and withdrawal rates and the decline in deliverability that occurs as gas is withdrawn, updated to reflect any changes since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- e. Provide any updates to peaking arrangements made since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.

- f. Provide a copy of all written procedures in use by LG&E for nominations and dispatching that have changed since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- g. If LG&E has utilized gas marketing/trading organizations to obtain gas supplies since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028, indicate which organizations were employed, gas volumes purchased, prices, terms, and current contractual arrangements between LG&E and these marketing firms.
- h. Provide any changes to the Request for Proposal or bidding process for gas supply that have changed since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028; for the same period provide the original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, the evaluation process that led to the selection of a supplier, and any written procedures that exist for this activity.
- i. Provide a copy of LG&E's gas supply plan and a written description of its gas supply planning process made since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- j. Provide any changes to any supply-planning computer models currently being used by LG&E since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- k. Provide organization charts of the overall corporate organization and of the gas planning, gas purchasing, and gas operations functions that have changed since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028. Describe any changes that have occurred in the corporate, gas planning and purchasing, and gas operations organizations since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- l. Provide any updates to job descriptions of the personnel working in the gas planning, gas purchasing, and gas operating functions since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.
- m. Provide copies of reports or internal audits or reviews of any aspect of the supply function conducted since Staff's gas procurement methodology request since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028. Include reports prepared by LG&E and outside auditors.

- n. Provide an updated copy of LG&E's strategic plan with primary emphasis on gas procurement, transmission, delivery, and expansion, including all significant related capital expenditures that has been prepared since LG&E's June 25, 2021, response to Question No. 2 from Commission Staff's First Request for Information in Case No. 2021-00028.

Please see LG&E's responses below:

- a. There have been no changes since the previous response.
- b. There have been no changes since the previous response except as follows:
- Executed a base form of agreement with two new suppliers. An existing supplier changed its name.
  - A summary of the key terms and conditions of the new gas supply commodity transactions entered into between June 1, 2021 through August 31, 2021, taken from the below referenced Nomination Schedules.
  - All Nomination Schedules entered into between June 1, 2021 through August 31, 2021, which reference and are Exhibits to the base forms of agreement which memorialize gas supply transactions, including the specifics of each transaction with respect to price, volume, and duration (term), but excluding transactions for a single day or weekend.

Consistent with the prior responses in Case No. 2021-00028, LG&E has not included Nomination Schedules associated with the purchase of any daily gas supplies. However, any updates to the bid solicitations and the awards associated with each daily purchase are provided in LG&E's response to part (h). These purchases are made under the base forms of agreements previously provided in order to satisfy either daily changes in load requirements or to optimize LG&E's gas supply portfolio as discussed, for example, in the original and updated responses to part (f).

**The following updated information has been included as attachments to this response subject to the Petition for Confidential Treatment filed with the original response:**

- Annual Supply Statistics for: November 1, 2020, through August 31, 2021.
- A copy of the base form of agreement with two new suppliers. Documentation reflecting the name change of one supplier.
- A summary of all transactions entered into between June 1, 2021, through August 31, 2021 (excluding transactions lasting only a single day or weekend).

- The Nomination Schedules for each of the transactions entered into between June 1, 2021, through August 31, 2021 (excluding transactions lasting only a single day or weekend).
- c. There have been no changes since the previous response.
- d. There have been no changes to these arrangements since the previous filing dated June 25, 2021 except as follows: Parameters associated with LG&E's on-system storage are included with the confidential 2021 Annual Gas Supply Plan attached to the supplemental response to part (i). Specifically, LG&E's on-system storage injection parameters can be found in Exhibit V of Exhibit 4 of the 2021 Annual Gas Supply Plan, and LG&E's on-system withdrawal parameters can be found in Exhibit V of Exhibit 4 of the 2021 Annual Gas Supply Plan.
- e. There have been no changes since the previous response.
- f. There have been no changes since the previous response.
- g. There have been no changes since the previous response.
- h. Attached are copies of LG&E's gas commodity supply solicitations conducted between June 1, 2021 and August 31, 2021. The documentation is provided in the date order of the bid release. These documents include a copy of the original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, and the evaluation process that led to the selection of a supplier. The longer-term bid solicitations associated with the 2021 Annual Gas Supply Plan (including copies of original bid documents, a listing of the suppliers that were contacted, the responses to the request for bid, and the evaluation process that led to the selection of a supplier) are included with LG&E's 2021 Annual Gas Supply Plan provided as a confidential attachment to the supplemental response to part (i).

**The following information has been included as an attachment to this response subject to the Petition for Confidential Treatment filed with the original response:**

- Bid documentation for gas commodity supply solicitations completed between June 1, 2021 and August 31, 2021.
- i. LG&E's 2021 Annual Gas Supply Plan was prepared by the Gas Management, Planning and Supply Department. Exhibit 1 to the 2021 Annual Gas Supply Plan includes the "Summary of Bid Evaluations for Natural Gas Supply Transactions (2021 Gas Supply Plan)" including the Bid Evaluation (Appendix A), Bid Invitation (Appendix B), list of suppliers invited to bid (Appendix C), bids provided by suppliers (Appendix D), and Bid Evaluation Methodology (Appendix E).



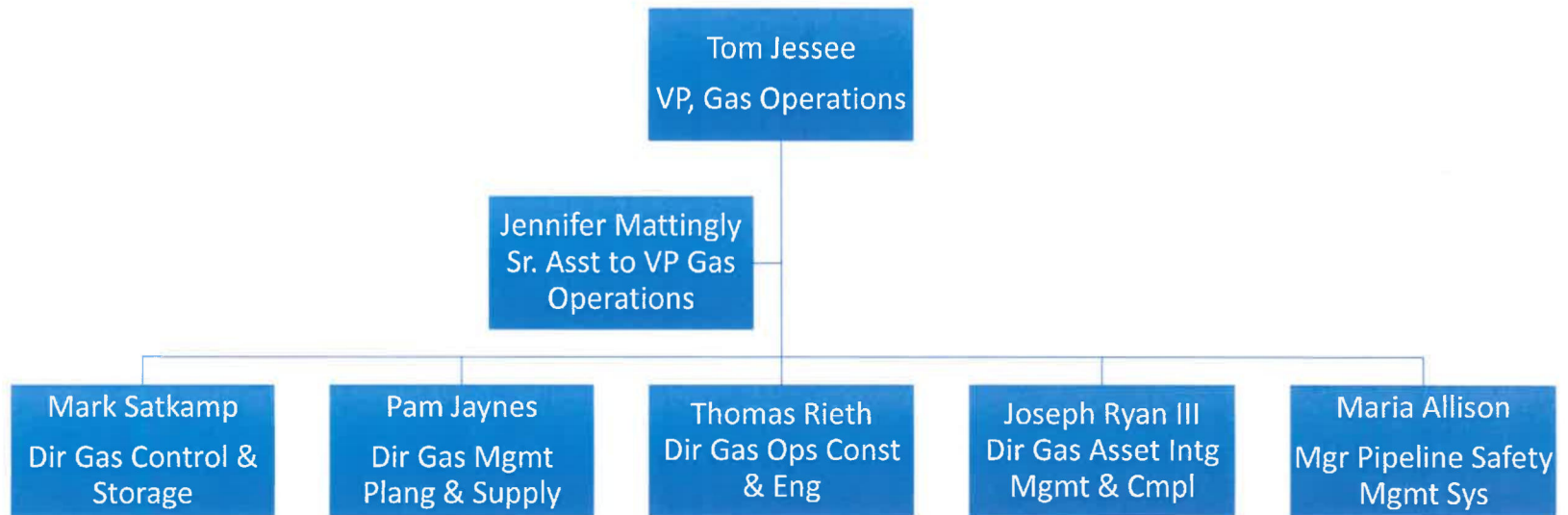
While the 2021 Annual Gas Supply Plan develops details for the upcoming year, it is primarily focused on deliveries for the upcoming winter season.

**The following information has been included as an attachment to this response subject to the Petition for Confidential Treatment filed with the original response:**

- 2021 Annual Gas Supply Plan (including 2021 bid documentation).
- j. There have been no changes since the previous response.
- k. Effective June 14, 2021, Mark Satkamp was promoted to Director, Gas Control & Storage. Effective July 1, 2021, Clay Murphy and Barry Walker retired. Effective August 23, 2021, Laura Thielen was promoted to Lead Gas Supply Specialist. See attached organizational charts.
- l. The following job descriptions have been updated and are included as attachments: Gas Supply Specialist I, Gas Supply Specialist II, Gas Supply Specialist III, Lead Gas Supply Specialist and Manager Gas Supply.
- m. There have been no changes since the previous response.
- n. There have been no changes since the previous response.

Supplemental  
Attachments to  
Response to  
Questions 2(b),  
2(h), and 2(i) are  
Confidential and  
provided separately  
under seal.

# VP Gas Operations



# Dir Gas Mgmt Plang & Supply





### Completed by Compensation Department

Job Code:	E7550
FLSA Classification	
EEO Category	
Approved By	M Denham
Effective Date	
Revision Date	July 2021
Mkt Pricing Date	

Job Title: Gas Supply Specialist I  
 Department: Gas Supply  
 Reports to Title: Director, Gas Management, Planning,  
 And Supply  
 Direct Report Title(s): N/A

### Purpose

This position is responsible for activities associated with developing LG&E's strategic gas supply and transportation position and policies; managing gas supply and transportation contracts; and managing the transportation of natural gas to qualifying industrial/commercial customers.

### Core Responsibilities

#### Strategy

With direction, conducts and analyzes various industry and competitive studies and provides strategic recommendations as to natural gas purchase, transportation, contract trends, inventory levels, alternate gas supply strategies, regulatory issues, and other matters.

With direction, develops strategic position; understands and explains relative competitive positions; recommends actions based on positions, strategies, and initiatives.

With direction, prepares guidelines for evaluation of supply and transportation service options, strategies and negotiations; develops contractual negotiation parameters; analyzes pricing methods and pricing tools; determines natural gas and transportation availability; develops and negotiates contractual language; oversees analysis and evaluation of contract proposals and bids; anticipates potential impact of future market conditions, trends, and regulations; makes associated recommendations and implements them when required so to do.

With direction, analyzes regulations, filings and testimony related to gas supply matters at the Federal Energy Regulatory Commission and the Kentucky Public Service Commission; oversees routine regulatory issues; makes associated recommendations and acts upon them when required so to do.

With direction, coordinates strategies with internal groups to ensure support of long-term strategic plans and initiatives; interacts with Gas Control, Corporate Law, State Regulation and Rates, and Forecasting.

#### Procurement

With direction, manages gas supply and transportation contracts to ensure full compliance, performance, and maximum cost efficiencies resulting in lower costs and reliable quantities of natural gas supplies; contracts are monitored for performance and deviations; makes recommendations as appropriate; interacts with Gas Control as necessary.

With direction, performs accounting functions and analyses associated with the purchase of natural gas; reviews gas supply and transportation invoices for accuracy and recommends approval; interacts with Internal and External Auditing and Revenue Accounting as necessary.

With direction, performs various complex statistical, cost and rate analyses within established guidelines related to supply/transportation solicitations.

With direction, negotiates contracts and contractual amendments for natural gas supplies; interacts with Corporate Law as necessary.

End-User Transportation

With direction, manages all gas activities, including the coordination of end-use customer volumes, associated with the functioning and operation of natural gas transportation by qualifying commercial and industrial customers in order to ensure the highest levels of customer service; interacts with large gas customers, Gas Control and other operating areas as necessary.

With direction, ensures full contract and tariff compliance by LG&E and end-user; all contract negotiations, communications and transactions are fully documented; interacts with Corporate Law as necessary.

With direction, works with IT to ensure applications that track end-user gas transportation activities are operating as required. Proposes, supports and tests modifications to applications as required.

With direction, closely works with other groups within LG&E to ensure adequate and timely gas quantities are delivered, measured, and billed; interacts with Gas Control, Billing Integrity, Major Accounts and Corporate Law as necessary.

---

**Education/Experience/Qualifications**

Bachelor's degree in business, mathematics, engineering, or science is required.

Must have valid driver's license.

---

**Preferred Qualifications**

Good analytical skills. Possess sound knowledge of Word and Excel applications. Ability to master a variety of IT applications. Very good oral and written communication skills as well as interpersonal relations skills. Ability to coordinate complex projects and issues. Gas industry experience is preferred.

---

**Attendance**

Regular attendance is essential for satisfactory performance.

---

**Work Conditions**

Normal office environment. May occasionally visit off-site locations such as customer facilities and gas storage fields.

---

**Physical Effort**

Primarily sitting. Some standing, walking, stooping.

---

**Job Hazards**

Low degree of danger or hazard in office setting and in field.

---



### Completed by Compensation Department

Job Code:	E7540
FLSA Classification	
EEO Category	
Approved By	M Denham
Effective Date	
Revision Date	July 2021
Mkt Pricing Date	

Job Title: Gas Supply Specialist II  
 Department: Gas Supply  
 Reports to Title: Director, Gas Management, Planning,  
 And Supply  
 Direct Report Title(s): N/A

### Purpose

This position is responsible for activities associated with developing LG&E's strategic gas supply and transportation position and policies; managing gas supply and transportation contracts; and managing the transportation of natural gas to qualifying industrial/commercial customers.

### Core Responsibilities

#### *Strategy*

Conducts and analyzes various industry and competitive studies and provides strategic recommendations as to natural gas purchase, transportation, contract trends, inventory levels, alternate gas supply strategies, regulatory issues, and other matters.

Develops strategic position; understands and explains relative competitive positions; recommends actions based on positions, strategies, and initiatives.

Prepares guidelines for evaluation of supply and transportation service options, strategies and negotiations; develops contractual negotiation parameters; analyzes pricing methods and pricing tools; determines natural gas and transportation availability; develops and negotiates contractual language; oversees analysis and evaluation of contract proposals and bids; anticipates potential impact of future market conditions, trends, and regulations; makes associated recommendations and implements them when required so to do.

Analyzes regulations, filings and testimony related to gas supply matters at the Federal Energy Regulatory Commission and the Kentucky Public Service Commission; oversees routine regulatory issues; makes associated recommendations and acts upon them when required so to do.

Coordinates strategies with internal groups to ensure support of long-term strategic plans and initiatives; interacts with Gas Control, Corporate Law, State Regulation and Rates, and Forecasting.

#### *Procurement*

Manages gas supply and transportation contracts to ensure full compliance, performance, and maximum cost efficiencies resulting in lower costs and reliable quantities of natural gas supplies; contracts are monitored for performance and deviations; makes recommendations as appropriate; interacts with Gas Control as necessary.

Performs accounting functions and analyses associated with the purchase of natural gas; reviews gas supply and transportation invoices for accuracy and recommends approval; interacts with Internal and External Auditing and Revenue Accounting as necessary.

Performs various complex statistical, cost and rate analyses within established guidelines related to supply/transportation solicitations. Performs scenario analysis using supply planning and optimization model.

Negotiates contracts and contractual amendments for natural gas supplies; interacts with Corporate Law as necessary.

#### *End-User Transportation*

Manages all gas activities, including the coordination of end-use customer volumes, associated with the functioning and operation of natural gas transportation by qualifying commercial and industrial customers in order to ensure the highest levels of customer service; interacts with large gas customers, Gas Control and other operating areas as necessary.

Ensures full contract and tariff compliance by LG&E and end-user; all contract negotiations, communications and transactions are fully documented; interacts with Marketing and Corporate Law as necessary.

Works with IT to ensure applications that track end-user gas transportation activities are operating as required. Proposes, supports, and tests modifications to applications as required.

Closely works with other groups within LG&E to ensure adequate and timely gas quantities are delivered, measured, and billed; interacts with Gas Control, Billing Integrity, Major Accounts, and Corporate Law as necessary.

---

#### **Education/Experience/Qualifications**

Bachelor's degree in business, mathematics, engineering, or science and a minimum of three years' gas industry experience is required.

Must have valid driver's license.

---

#### **Preferred Qualifications**

Good analytical skills. Possess sound knowledge of Word and Excel applications. Ability to master a variety of IT applications. Excellent oral and written communication skills as well as interpersonal relations skills. Ability to coordinate complex projects and issues.

---

#### **Attendance**

Regular attendance is essential for satisfactory performance.

---

#### **Work Conditions**

Normal office environment. May occasionally visit off-site locations such as customer facilities and gas storage fields.

---

#### **Physical Effort**

Primarily sitting. Some standing, walking, stooping.

---

#### **Job Hazards**

Low degree of danger or hazard in office setting and in field.

---



**Completed by Compensation Department**

Job Code:	<b>E7545</b>
FLSA Classification	
EEO Category	
Approved By	M Denham
Effective Date	
Revision Date	July 2021
Mkt Pricing Date	

Job Title: Gas Supply Specialist III  
 Department: Gas Supply  
 Reports to Title: Director, Gas Management, Planning,  
 And Supply  
 Direct Report Title(s): N/A

**Purpose**

This position is responsible for activities associated with developing LG&E's strategic gas supply and transportation position and policies; managing gas supply and transportation contracts; and managing the transportation of natural gas to qualifying industrial/commercial customers.

**Core Responsibilities*****Strategy***

Conducts and analyzes various industry and competitive studies and provides strategic recommendations as to natural gas purchase, transportation, contract trends, inventory levels, alternate gas supply strategies, regulatory issues, and other matters.

Develops strategic position; understands and explains relative competitive positions; recommends actions based on positions, strategies, and initiatives.

Prepares guidelines for evaluation of supply and transportation service options, strategies and negotiations; develops contractual negotiation parameters; analyzes pricing methods and pricing tools; determines natural gas and transportation availability; develops and negotiates contractual language; oversees analysis and evaluation of contract proposals and bids; anticipates potential impact of future market conditions, trends, and regulations; makes associated recommendations and implements them when required so to do.

Analyzes regulations, filings and testimony related to gas supply matters at the Federal Energy Regulatory Commission and the Kentucky Public Service Commission; oversees routine regulatory issues; makes associated recommendations and acts upon them when required so to do.

Coordinates strategies with internal groups to ensure support of long-term strategic plans and initiatives; interacts with Gas Control, Corporate Law, State Regulation and Rates, and Forecasting.

***Procurement***

Manages gas supply and transportation contracts to ensure full compliance, performance, and maximum cost efficiencies resulting in lower costs and reliable quantities of natural gas supplies; contracts are monitored for performance and deviations; makes recommendations as appropriate; interacts with Gas Control as necessary.

Performs accounting functions and analyses associated with the purchase of natural gas; reviews gas supply and transportation invoices for accuracy and recommends approval; interacts with Internal and External Auditing and Revenue Accounting as necessary.

---

Performs various complex statistical, cost and rate analyses within established guidelines related to supply/transportation solicitations. Performs scenario analysis using supply planning and optimization model.

Jaynes

Negotiates contracts and contractual amendments for natural gas supplies; interacts with Corporate Law as necessary.

#### *End-User Transportation*

Manages all gas activities, including the coordination of end-use customer volumes, associated with the functioning and operation of natural gas transportation by qualifying commercial and industrial customers in order to ensure the highest levels of customer service; interacts with large gas customers, Gas Control and other operating areas as necessary.

Ensures full contract and tariff compliance by LG&E and end-user; all contract negotiations, communications and transactions are fully documented; interacts with Marketing and Corporate Law as necessary.

Works with IT to ensure applications that track end-user gas transportation activities are operating as required. Proposes, supports, and tests modifications to applications as required.

Closely works with other groups within LG&E to ensure adequate and timely gas quantities are delivered, measured, and billed; interacts with Gas Control, Billing Integrity, Major Accounts, and Corporate Law as necessary.

---

#### **Education/Experience/Qualifications**

Bachelor's degree in business, mathematics, engineering, or science and a minimum of five years gas industry experience required.

Must have valid driver's license.

---

#### **Preferred Qualifications**

Excellent analytical skills. Possess sound knowledge of Word and Excel spreadsheet applications, and optimization models. Ability to master a variety of IT applications. Excellent oral and written communication skills as well as interpersonal relations skills. Ability to coordinate complex projects and issues.

---

#### **Attendance**

Regular attendance is essential for satisfactory performance.

---

#### **Work Conditions**

Normal office environment. May occasionally visit off-site locations such as customer facilities and gas storage fields.

---

#### **Physical Effort**

Primarily sitting. Some standing, walking, stooping.

---

#### **Job Hazards**

Low degree of danger or hazard in office setting and in field.

---


**Completed by Compensation Department**

Job Code:	E7555
FLSA Classification	
EEO Category	
Approved By	R Lacy
Effective Date	
Revision Date	Jun 2021
Mkt Pricing Date	

Job Title: Lead Gas Supply Specialist  
 Department: Gas Supply  
 Reports to Title: Manager, Gas Supply  
 Direct Report Title(s): N/A

**Purpose**

This position is responsible for activities associated with developing LG&E's strategic gas supply and transportation position and policies; managing gas supply and transportation contracts; and managing the transportation of natural gas to qualifying industrial/commercial customers. This position is considered an industry expert level. Incumbent will be multi-knowledgeable and multi-skilled in all aspects of the gas supply business and focus on the highly complex work activities. Will work with a high degree of autonomy and serve as work leader to junior level Gas Supply Specialists.

**Core Responsibilities**
***Strategy***

Leads efforts to conduct and analyze various industry and benchmark studies and provides strategic recommendations as to natural gas purchases, transportation services, contract trends, storage inventory levels, alternate gas supply strategies, regulatory issues, and other matters.

Leads efforts to develop strategic position; understands and explains market developments; recommends actions based on industry trends, strategies, and initiatives; anticipates impact of future market conditions (supply/demand/regulations) on price and ability to meet customer requirements; makes associated recommendations and implements them when required so to do.

Leads efforts to prepare guidelines for evaluation of supply and transportation service options, strategies and negotiations; develops contractual negotiation parameters; analyzes pricing methods and pricing tools; determines natural gas supply availability and transportation service options; ; oversees analysis and evaluation of contract proposals and bids in order to make recommendations;

Leads efforts to analyze regulations, filings and testimony related to gas supply matters at the Federal Energy Regulatory Commission and the Kentucky Public Service Commission; oversees routine regulatory issues; makes associated recommendations and acts upon them when required so to do.

Leads efforts to coordinate strategies with internal groups to ensure support of long-term strategic plans and initiatives; interacts with Gas Control, Corporate Law, State Regulation and Rates, and Sales Analysis and Forecasting.

Leads efforts to maintain adequate working knowledge of industry and regulatory developments affecting natural gas in order to explain same in response to enquiries from internal and external parties.

***Procurement***

With direction, leads effort to manage gas supply and transportation contracts to ensure full compliance, performance, and maximum cost efficiencies resulting in lower costs and reliable quantities of natural gas supplies; contracts are monitored for performance and deviations; makes recommendations as appropriate; interacts with Gas Control as necessary.

Leads efforts to perform accounting functions and analyses associated with the purchase of natural gas; reviews gas supply and transportation invoices for accuracy and recommends approval; interacts with Internal and External Auditing and Revenue Accounting as necessary.

Leads efforts to design and perform various complex statistical, cost and rate analyses within established guidelines related to supply/transportation solicitations; recommends appropriate actions.

Leads efforts to negotiate contracts and contractual amendments for natural gas supplies; develops contractual language; interacts with Corporate Law as necessary; maintains good working relationship with suppliers; researches and recommends new suppliers.

Informally manages others by leading efforts to support and teach others within Gas Supply to provide appropriate backup and cross-training.

#### *End-User Transportation*

Leads efforts to manage all gas activities, including the coordination of end-use customer volumes, associated with the functioning and operation of natural gas transportation by qualifying commercial and industrial end-users in order to ensure the highest levels of customer service; interacts with large gas customers, Gas Control and other operating areas as necessary.

Leads efforts to ensure full contract and tariff compliance by LG&E and end-user; all contract negotiations, communications and transactions are fully documented; interacts with Major Accounts, Gas Engineering, and Corporate Law as necessary.

Leads efforts to work with IT to ensure applications that track end-user gas transportation activities are designed and operating as required. Proposes, supports, and tests modifications to applications as required.

Leads efforts to closely work with other groups within LG&E to ensure adequate and timely gas quantities are delivered, measured, and billed; interacts with Major Accounts, Gas Control, Billing Integrity, and Corporate Law as necessary.

Performs other duties as assigned.

---

#### **Education/Experience/Qualifications**

Bachelor's degree in business, mathematics, engineering, or science and a minimum of 7 years of in-depth gas and/or electric industry experience is required. Must have valid driver's license.

---

#### **Preferred Qualifications**

Excellent analytical and problem-solving skills. Possess sound knowledge of Word and Excel spreadsheet applications, and optimization models. Ability to master a variety of IT applications. Excellent oral and written communication skills as well as interpersonal relations skills. Ability to coordinate complex projects and issues. Possess leadership skills.

---

---

**Attendance**

Regular attendance is essential for satisfactory performance.

---

---

**Work Conditions**

Normal office environment. May occasionally visit off-site locations such as customer facilities and storage fields.

---

---

**Physical Effort**

Primarily sitting. Some standing, walking, stooping.

---

---

**Job Hazards**

Low degree of danger or hazard in office setting and in field.

---



Job Title: Manager Gas Supply  
 Department: Gas Supply  
 Reports to Title: Director – Gas Management, Planning,  
 and Supply  
 Direct Report Title(s): Gas Supply Specialist

#### Completed by Compensation Department

Job Code:	E7565
FLSA Classification	
EEO Category	
Approved By	R Lacy
Effective Date	
Revision Date	Jun 2021
Mkt Pricing Date	

#### Purpose

This position is responsible for managing the procurement and transportation of adequate gas supplies for system supply at the most economic cost and the coordination of the transportation of customer-owned gas. This is a leadership position responsible for supporting, coaching and teaching others within the department in order to develop them. Will be responsible for working and making decisions with a high degree of autonomy.

#### Core Responsibilities

Produces viable gas supply strategies through understanding and coordination of gas supply planning, including forecasted gas system supply requirements, expected storage field performance, regulatory requirements, contractual parameters and other criteria to determine and recommend gas supply transactions and pipeline transportation contract demand levels that assure adequate system gas supplies at the most economic cost.

Analyzes forecasts, conducts hedging and pricing analyses and optimization studies as a routine part of the gas supply planning function and documents same.

Develops and solicits proposals, analyzes, evaluates, negotiates, and recommends approval of contracts for natural gas supplies in accordance with established Company policies, so as to mitigate Company exposure to risk of loss.

Interacts with major natural gas producers, marketers, and interstate pipeline natural gas transporters in the role of negotiating and administering the terms and conditions of gas supply and transportation contracts.

Participates in the preparation and presentation of filings, responds to data requests, develops testimony, and assures Company's interest in gas supply matters at the Federal Energy Regulatory Commission and the Kentucky Public Service Commission ("KYPSC"). May be required to testify before the KYPSC.

Uses industry experience to develop innovative ways in which to purchase gas and minimize costs while maintaining supply reliability

Develops, documents and performs ad hoc analyses with little or no guidance by integrating new and existing knowledge and experience in order to make viable recommendations.

Uses expertise to develop procedures and ensure compliance with regulations, including auditing of same.

Establishes policies and procedures and oversees processes related to the coordination, arrangement, and proper accounting of the transportation of customer-owned gas.

Provides Rate Department with estimates of expected costs and quantities of system supply of customer-transported gas for use in Gas Supply Adjustment filings.

---

Must maintain a highly proficient working knowledge of natural gas industry matters and financial reporting requirements, and be able to act on same, as well as explain the importance of these to others in an understandable fashion. **Jaynes**

Supervises and direct others with a focus on coaching, teaching, and skill development

---

**Education/Experience/Qualifications**

Bachelor's degree in business, mathematics, engineering, or science, and a minimum of 5 years of in-depth gas industry experience is required. Should possess both a broad and in-depth knowledge of the gas supply purchase and transportation functions, including end-use customer transport, natural gas commodity purchasing, hedging, forecasting, etc. Must be able to lead actions and projects required to create framework necessary for others to implement various tactical aspects of the gas supply plan. Must possess excellent decision-making and negotiation skills. Should be thoroughly acquainted with state and federal regulations which affect Gas Supply activities. Must be able to discern trends in the marketplace that will impact current gas supply plans and arrangements and must be able to integrate these trends in the development of new gas supply strategies.

---

**Preferred Qualifications**

Excellent strategic thinking, analytical and problem-solving skills. Possess sound knowledge of Word, Excel spreadsheet applications, and optimization models. Ability to master a variety of IT applications. Excellent oral and written communication skills as well as interpersonal relations skills.

---

**Attendance**

Regular attendance is essential for satisfactory performance.

---

**Work Conditions**

Normal office environment. May occasionally visit off-site locations such as customer facilities and storage fields.

---

**Physical Effort**

Primarily sitting. Some standing, walking, stooping.

---

**Job Hazards**

Low degree of danger or hazard in office setting and in field.

---