

Ms. Linda Bridwell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601-8294

July 30, 2021

RE:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC

COMPANY FOR APPROVAL OF REVISED GAS LINE TRACKER

RATES EFFECTIVE FOR SERVICES RENDERED ON AND

AFTER MAY 1, 2021 – CASE NO. 2021-00091

Dear Ms. Bridwell,

Pursuant to the Commission's June 28, 2021 Order in the above-referenced proceeding and the Commission's June 30, 2021 Order issued in Case No. 2020-00350 ("June 30, 2021 Order"), Louisville Gas and Electric Company ("LG&E") is filing a rate reconciliation incorporating the revisions approved for its Gas Line Tracker ("GLT") in the June 30, 2021 Order, as well as revised tariff sheets for P.S.C. Gas No. 13, Original Sheet No. 84. I am also enclosing updated exhibits (in PDF and native Excel format) that contain the calculations and supporting documentation of the proposed GLT charges which now reflect the GLT project eliminations approved in the June 30, 2021 Order.

In LG&E's most recent base rate case, LG&E proposed to eliminate certain GLT programs and projects (the Steel Services Program, the Transmission Modernization Program, the Main Replacements portion of the Leak Mitigation Project, and the Aldyl-A Mains and Services Replacement Project) from recovery in the GLT mechanism to recovery in base rates¹. As such, in the base rate case, LG&E proposed revised GLT charges that reflected the removal of such GLT programs and projects². During the pendency of the base rate case, LG&E filed

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¹ See Case No. 2020-00350, Direct Testimony of Robert M. Conroy, 54.

² GLT charges previously approved by the Commission's April 28, 2020 Order in Case No. 2020-00302, Electronic Application of Louisville Gas and Electric Company for Approval of

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its 2021 GLT Annual Filing in Case No. 2021-00091³ but did not reflect the proposed eliminations since approval had not yet been granted by the Commission. In the base rate case⁴, LG&E committed to providing a rate reconciliation or tariff filing in order to reflect the current year's forecasted revenue requirement, the prior year's revenue requirement true-up, and the project eliminations effective as of the date new base rates are approved by the Commission⁵. The enclosed updated exhibits from LG&E's 2021 Annual GLT Filing reflect these items and provide the resulting GLT charges which are incorporated into a revised GLT tariff sheet with a requested effective date of services rendered on or after September 1, 2021.

To assist in the Commission's review, I am enclosing as Appendix A a comparison of GLT charges from the 2020 GLT Annual Filing (filed on February 28, 2020 in Case No. 2020-00032), 2020 Base Rate Case (filed on November 26, 2020 in Case No. 2020-00350), 2021 GLT Annual Filing (filed on March 1, 2021 in Case No. 2021-00091) and the GLT Rate Reconciliation (filed on July 30, 2021 in Case No. 2021-00091 post-case correspondence and the Commission's Tariff Filing System). It is important to note that the normal operation of the GLT mechanism functions so that the component of the total GLT charges that relates to the current year's forecasted revenue requirement is an estimated rate billed to customers. Once the actual revenue requirement is determined in the next GLT Annual Filing and compared to the actual GLT revenues collected based on the estimated rate, a true-up is calculated and incorporated into the new GLT charges. As such, the 2021 true-up will be calculated and reflected in LG&E's 2022 Annual GLT filing.

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on July 30, 2021 and that there are currently no parties in this

Revised Rates to be Recovered Through Its Gas Line Tracker Beginning with the First Billing Cycle for May 2020, were revised to remove the proposed GLT projects being eliminated.

³ Revised GLT charges incorporated the 2021 forecasted GLT revenue requirement and the 2020 revenue requirement true-up. These charges were approved effective June 28, 2021 on a services rendered basis (Commission's June 28, 2021 Order in Case No. 2021-00091).

⁴ See Case No. 2020-00350, Direct Testimony of Robert M. Conroy, 55.

⁵ Base rates (and the revised GLT charges) were approved effective July 1, 2021 on a services rendered basis (Commission's June 30, 2021 Order in Case No. 2020-00350).

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proceeding that the Commission has excused from participation by electronic means.

Sincerely, Andrea M. Fackler

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