

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF)
LOUISVILLE GAS AND ELECTRIC) **CASE NO. 2024-00125**
COMPANY TO REVISE ITS LOCAL)
GAS DELIVERY SERVICE TARIFF)

DATA REQUESTS OF
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO
LOUISVILLE/JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to the Louisville/Jefferson County Metropolitan Sewer District (“MSD”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on April 30, 2024.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, MSD, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if MSD receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If MSD objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground 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.

8. In the event any document requested has been destroyed or transferred beyond the control of MSD, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

1. Please refer to the Direct Testimony of James W. Gellner, P.E. of July 3, 2024 (“Gellner Direct”) at page 3, line 27. Please define “imported,” as it pertains to propane, including whether “imported” refers to propane suppliers in Kentucky and surrounding states.
2. Please refer to Gellner Direct at page 3, line 28. Do RNG production facilities that do not use propane present health and safety hazards?
 - a. If so, please describe the hazards and how MSD manages them.
 - b. If MSD uses propane to increase the Btu value of its RNG, describe its safety and health concerns, and how will it manage those concerns?
3. Please refer to Gellner Direct at page 3. Please provide MSD’s financial analyses regarding (1) the cost of the RNG Project at Morris Forman; (2) the anticipated revenues, including tax credits; and (3) the costs to increase the Btu value of its RNG with propane.
4. Please refer to Gellner Direct at page 3, line 49. With respect to the tax credits:
 - a. Please identify and describe each credit (tax and other) MSD expects to receive and the value of each credit per MMBtu of RNG produced.
 - b. Will the addition of propane to increase the Btu value of RNG change the type or amount of tax credits received by MSD? If yes, please explain.
5. Please refer to Gellner Direct at page 4, lines 9 – 10. Please provide a detailed description of the “other contaminants” that must be removed from MSD’s RNG production.
6. Please refer to Gellner Direct at page 4, lines 12 – 14. With respect to the statement “RNG systems have been widely adopted in numerous states and have been proven to reliably produce pipeline quality gas”:

- a. Please provide all documents, studies and information that supports this statement, along with any information regarding how long those RNG systems have been in operation.
 - b. How many of the RNG systems identified in part a are connected to local gas distribution companies? Please provide a specific list of these facilities.
7. Please refer to Gellner Direct at page 4, line 18 and page 6, line 19. Please confirm that LG&E's customers located in the zone of influence of MSD's RNG injection site will use more gas if the Btu content of the RNG is 969.5 Btu/Scf instead of 1,035 Btu/Scf? If MSD cannot confirm this, please explain why not.
8. Please refer to Gellner Direct at page 4, line 28. Has a customer connected to LG&E's system agreed or been identified to purchase MSD's RNG? If yes, please identify the customer and how they would purchase the gas from MSD.
9. Please refer to Gellner Direct at page 5, line 15. In your experience, please provide the average timeline from start (initial request for site approval presented to pipeline system) to finish ("start implementation") for an RNG project. How many projects are included in the average timeline?
10. Please refer to Gellner Direct at page 6, line 24.
 - a. What is MSD's definition of a "negligible" impact?
 - b. What reduction in heating value would constitute an impact that is greater than "negligible"?
 - c. Provide all analyses performed to determine the impact on nearby LG&E customers resulting from the injection of MSD's RNG onto LG&E's gas distribution system.

11. Please refer to Gellner Direct at page 7, lines 13 – 15. Please provide MSD’s calculation or analysis of the percentage of MSD’s RNG to LG&E’s gas flow near the injection site.
12. Please verify projected LG&E natural gas requirements (usage) and RNG production delivered to LG&E at the MSD Morris Foreman RNG site by average hourly usage/production and max hourly usage/production after the RNG plant is at full capacity.

Dated: July 17, 2024

Respectfully submitted,



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CERTIFICATE OF SERVICE

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 17, 2024, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink, appearing to read "Sam V. Judd".

Counsel for Louisville Gas and Electric Company