

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)

LOUISVILLE GAS AND ELECTRIC COMPANY’S
NOTICE OF ERRATA TO REBUTTAL TESTIMONY

Louisville Gas and Electric Company (“LG&E”), hereby submits an errata filing to correct Tom C. Rieth’s Rebuttal Testimony and Exhibit TCR-1 filed on August 7, 2024. LG&E states as follows:

1. On August 7, 2024, LG&E submitted Rebuttal Testimony from Tom C. Rieth. Mr. Rieth’s testimony explained that based on system modeling, Louisville Metropolitan Sewer District’s (“MSD”) renewable natural gas (“RNG”) will likely be delivered to at least 1,600 retail LG&E customers. In support, Mr. Rieth’s Rebuttal Testimony included Exhibit TCR-1, which is the confidential modeling analysis that predicts how many customers will receive the RNG that MSD proposes to deliver to LG&E’s system in four different operating scenarios.

2. On August 8, 2024, LG&E discovered an error in Exhibit TCR-1. LG&E learned that the gas system modeling software module, Synergi – Customer Management Module (“CMM”), did not utilize current customer information but instead applied outdated customer data. This resulted in understated projections regarding the number of customers that will receive MSD’s RNG.

3. LG&E learned of this error while performing gas modeling work that required accessing the CMM database, which displayed the outdated customer information date. LG&E

investigated the source of the error, which is a synchronization of the “test” and “production” environments in CMM that did not complete correctly.

4. The only difference between the Exhibit TCR-1 that was initially submitted, and the corrected Exhibit TCR-1 is that updated customer information was utilized in the modeling. No changes were made to the four scenarios, including the load information and temperatures. In the corrected analysis, the model predicts that at least 6,500 retail customers will receive MSD’s RNG.

5. Mr. Rieth’s corrected testimony is attached hereto as Exhibit A. Exhibit TCR-1 has been revised to reflect the modeling analyses based upon the corrected customer information. Within the Rebuttal Testimony, the following customer numbers have been corrected, with the original and amended text identified in bold:

Page	Line	Original Rebuttal Testimony	Corrected Rebuttal Testimony
1	18-19	(2) that based on system modeling MSD’s RNG will likely be delivered to at least 1,600 retail customers	(2) that based on system modeling MSD’s RNG will likely be delivered to at least 6,500 retail customers
8	19-22	The modeling results for this scenario predict that approximately 1,900 retail customers, including residential, commercial, and industrial/firm transportation customers, receive RNG in an amount up to 24% of their supply.	The modeling results for this scenario predict that approximately 9,000 retail customers, including residential, commercial, and industrial/firm transportation customers, receive RNG in an amount up to 24% of their supply.
9	3-7	The results for this scenario predict that approximately 1,000 retail customers receive RNG in an amount up to 24% of their gas supply and approximately 600 customers receive RNG in an amount up to 49% of their gas supply. A total of approximately 1,600 customers are impacted by this scenario.	The results for this scenario predict that approximately 4,000 retail customers receive RNG in an amount up to 24% of their gas supply and approximately 2,500 customers receive RNG in an amount up to 49% of their gas supply. A total of approximately 6,500 customers are impacted by this scenario.
9	10-14	This scenario assumes MSD delivers RNG at a rate of 60 Mcf per hour and uses gas at a rate of 40 Mcf per hour. In this scenario approximately 3,400 retail customers receive RNG in an amount up to 24% of their gas supply,	This scenario assumes MSD delivers RNG at a rate of 60 Mcf per hour and uses gas at a rate of 40 Mcf per hour. In this scenario approximately 12,600 retail customers receive RNG in an amount up to 24% of their gas supply,

Page	Line	Original Rebuttal Testimony	Corrected Rebuttal Testimony
		and approximately 2,800 retail customers receive RNG in an amount up to 49% of their gas supply. A total of approximately 6,200 customers are impacted by this scenario.	and approximately 13,200 retail customers receive RNG in an amount up to 49% of their gas supply. A total of approximately 25,800 customers are impacted by this scenario.
9	19-23	In this scenario approximately 6,000 customers receive RNG in an amount up to 24% of their gas supply, approximately 1,100 customers receive RNG in an amount up to 49% of their gas supply, and approximately 1,600 customers receive RNG in an amount up to 74% of their gas supply. A total of approximately 8,700 customers are impacted by this scenario.	In this scenario approximately 26,000 customers receive RNG in an amount up to 24% of their gas supply, approximately 6,000 customers receive RNG in an amount up to 49% of their gas supply, and approximately 7,300 customers receive RNG in an amount up to 74% of their gas supply. A total of approximately 39,300 customers are impacted by this scenario.
14	15-19	In the case of MSD's proposed RNG project, the system modeling provided in Exhibit 1 predicts that over 1,600 other customers will be impacted by the RNG injection with the number of customers and concentration varying based on factors such as temperature, system loads and operating conditions.	In the case of MSD's proposed RNG project, the system modeling provided in Exhibit 1 predicts that over 6,500 other customers will be impacted by the RNG injection with the number of customers and concentration varying based on factors such as temperature, system loads and operating conditions.

6. As demonstrated in the preceding table, the corrections to Mr. Rieth's Rebuttal Testimony are limited only to the number of customers affected in each of the four modeled scenarios.

WHEREFORE, LG&E respectfully provides notice of its errata filing to correct Mr. Rieth's Rebuttal Testimony and Exhibit TCR-1.

Dated: August 13, 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 August 13, 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", is positioned above a horizontal line.

Counsel for Louisville Gas and Electric Company