

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

In the Matter of:

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

**RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
LOUISVILLE/JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT'S
POST-HEARING REQUEST FOR INFORMATION
DATED NOVEMBER 13, 2024**

FILED: NOVEMBER 27, 2024

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Tom Rieth**, being duly sworn, deposes and says that he is Vice President – Gas Operations for Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Tom Rieth

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 21st day of November _____ 2024.



Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Louisville/Jefferson County Metropolitan Sewer District's Post-Hearing Request for Information
Dated November 13, 2024**

Case No. 2024-00125

Question No. 3-1

Responding Witness: Tom C. Rieth

- Q-3-1. Please refer to MSD's cross-examination of the Companies' Witness Rieth at approximately 9:22 a.m. Please provide data on the variation in heating value for gas received from Tennessee Gas and Texas gas over the last three years. Monthly average data for one year was provided in testimony. Are shorter duration average heating values available (i.e. daily or weekly averages)? If so, please provide that data for the three-year period.
- A-3-1. See attachment to PSC Post Hearing Data Response No. 1 for three years of daily heating values for Tennessee Gas and Texas Gas.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Louisville/Jefferson County Metropolitan Sewer District's Post-
Hearing Request for Information
Dated November 13, 2024**

Case No. 2024-00125

Question No. 3-2

Responding Witness: Tom C. Rieth

Q-3-2. Please refer to MSD's cross-examination of the Companies' Witness Rieth at approximately 9:36 a.m. Is there a higher pressure and higher flow gas main where RNG from the MFWQTC (Morris Forman) could be injected into LG&E's system? Where is the main line located, and what is the flow and pressure in that line? Where is the location of LG&E's connection to the interstate pipeline (Tennessee Gas and Texas Gas supply)?

A-3-2. The nearest LG&E transmission pipeline is located approximately 3,300 feet south when measured from the Morris Forman plant entrance at its intersection with Algonquin Parkway. The path from the Morris Foreman plant to the transmission pipeline is densely congested. MSD, at its sole cost and expense, would be responsible for designing, engineering, procuring, constructing, installing, testing, owning, operating, and maintaining a pipeline to interconnect with the LG&E transmission pipeline.

The 16-inch steel transmission pipeline runs east to west on the north side of Bell's Lane, and it dead ends approximately 1 mile west of the intersection of Bell's Lane and South 41st Street. The pipeline feeds one high pressure regulator facility in the area -- the Bell's Lane regulator station. The average operating pressure on this segment of pipeline from November 1, 2023 to November 1, 2024 was 148.59 psig, with a minimum of 119.13 psig and maximum of 213.7 psig. The average pressure calculation was based on hourly average pressure data.

Flow on the transmission pipeline would vary based on time of year and temperature. The below table outlines the flows predicted at the Bell's Lane regulator facility by the Synergi model for the four scenarios provided in the response to TCR-1.

TCR-1 Scenario	Bell's Ln Regulator Station Flow
#1 (-9° F)	2879 mcfh

#2 (30° F)	947 mcfh
#3 (65° F)	1294 mcfh
#4 (65° F)	495 mcfh

LG&E has ten custody transfer connection points with the Texas Gas pipeline and two with the Tennessee Gas pipeline system. The ten Texas Gas connections are spread across four counties (Meade, Jefferson, Oldham and Trimble). The nearest LG&E Texas Gas connection- point to the Morris Foreman plant is 8.6 miles to the south near Fairdale, Kentucky. The two LG&E connections with the Tennessee Gas pipeline system are located in Hart County, Kentucky and Washington County, Kentucky. The nearest LG&E Tennessee Gas connection point to the Morris Foreman plant is approximately 70.3 miles south in Hart County, KY.

Below are publicly available maps of the natural gas transmission pipeline systems.

PHMSA's National Pipeline Mapping System

[NPMS – Home \(dot.gov\)](#)

- **Click Use Public Map Viewer**
- **In the Choose State or Federal Waters Category drop-down box, select Kentucky**
- **In the Choose County or Federal Waters Area drop-down box, select a county (see suggestions above)**
- **Gas transmission pipelines are blue on the map. The pipelines may or may not be operated by LG&E.**

Tennessee Pipeline

[TGP Segment - Pin Map-20211116072358.pdf \(kindermorgan.com\)](#)

- **https://pipeline2.kindermorgan.com/Documents/TGP/TGP_Segment_-_Pin_Map-20211116072358.pdf**

Texas Pipeline

[Boardwalk Pipelines - Our Business - System Map \(bwpipelines.com\)](#)

- **<https://www.bwpipelines.com/our-business/system-map/default.aspx>**

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Louisville/Jefferson County Metropolitan Sewer District's Post-Hearing Request for Information
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Case No. 2024-00125

Question No. 3-3

Responding Witness: Tom C. Rieth

- Q-3-3. Please refer to MSD's cross-examination of the Companies' Witness Rieth at approximately 10:52 a.m. The configuration of the tie-in of RNG supply to the Morris Forman WQTC service line, upstream of the LG&E gas meter was discussed in testimony. The purpose of this connection would be to maximize the consumption of produced RNG by MSD for their gas needs at the Morris Forman WQTC. Please confirm the location and number of pressure regulators between the gas main and the Morris Forman WQTC gas meter.
- A-3-3. The new meter facility for the Morris Foreman plant is located on the south corner of the intersection of Algonquin Parkway and Gibson Lane, approximately 50 feet from the high pressure distribution main. The meter installation includes two Dresser 23M rotary meters and two 2-inch Mooney Flowgrid regulator runs with matching monitors. The meters and regulators are mounted on the same pad.