

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE COMMISSION STAFF'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 Commission Staff’s Post-Hearing Request for Information
Dated November 13, 2024**

Case No. 2024-00125

Question No. 1

Responding Witness: Tom C. Rieth

- Q-1. Provide the lowest and highest Btu rating for gas entering LG&E’s pipeline from the Texas Gas and Tennessee Gas systems for 2023 and 2024. If measured by online chromatographs or some other means of measurement, provide the readings reflecting the heating information.

- A-1. The following table provides the lowest and highest daily Btu readings (“ratings”) for gas entering LG&E’s pipeline from the Texas Gas and Tennessee Gas systems for 2023, and for 2024 through October 31.

Interstate Pipeline	2023 Lowest Btu Rating	2023 Highest Btu Rating	2024 Lowest Btu Rating	2024 Highest Btu Rating
Texas Gas	1,012	1,074	1,019	1,072
Tennessee Gas*	1,049	1,069	1,048	1,071

* Daily Btu ratings for Tennessee Gas can be skewed by very low volumes being delivered to LG&E by the interstate pipeline on a particular day. Btu ratings for days with less than 100 Mcf flowing were excluded from the table above.

The daily Btu ratings for each pipeline for November 1, 2021 through October 31, 2024, are provided in the attached exhibit. Additional data has been provided to respond to MSD’s Post Hearing Data Request No. 3. These Btu ratings were calculated by dividing the daily energy quantities (measured in MMBtu) by volumes (measured in Mcf) determined by each interstate pipeline.

The daily Btu ratings for both interstate pipelines are higher than the current minimum heating value of 967 Btu/Scf required by Rate LGDS for every day in 2023 and 2024. The daily Btu ratings are at or above the proposed minimum heating value of 1,035 Btu/Scf on 92% of the days in 2023 and 2024 for Texas Gas and for 100% of the days in 2023 and 2024 for Tennessee Gas.

Daily heating value variability associated with gas received from LG&E’s interstate pipeline suppliers is experienced consistently across LG&E’s gas system as opposed to only in isolated areas of the system. Given that LG&E’s customers are billed based on their volumetric usage, LG&E strives to provide a consistent natural gas product to all customers.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Commission Staff's Post-Hearing Request for Information
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Question No. 2

Responding Witness: Tom C. Rieth

- Q-2. Of the renewable natural gas (RNG) entities sending inquiries to LG&E about its Local Gas Delivery Service (LGDS), confirm if any of the entities currently produce RNG. Provide scenario information, including customer class breakdown and number of customers by class impacted, on modeling for the various scenarios outlined in TCR-1.
- A-2. Of the entities who have sent inquiries, to the best of LG&E's knowledge, none currently produce RNG in LG&E's service area, including the four entities listed by LG&E in response to Commission Data Request 1-1.

LOUISVILLE GAS AND ELECTRIC COMPANY

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Question No. 3

Responding Witness: Tom C. Rieth

- Q-3. Provide information on other modeling scenarios conducted by LG&E using the Synergi modeling techniques for the purpose of ascertaining information on potential RNG customer impact.
- A-3. LG&E employs a standard approach to all inquiries it receives for RNG site evaluations. When it receives a request, LG&E first determines if the proposed RNG injections are hydraulically feasible (which means that LG&E can transport the gas into its system year-round.)

The RNG producer provides a location and proposed maximum injection rate (mcfh). The injection location is built into the Synergi model. The proposed maximum injection rate is applied to that location in the Design Day Model (-9° F), which represents typical winter operation on the LG&E system adjusted to account for extreme cold temperatures. . The model determines a required discharge pressure at the injection point. If the calculated discharge pressure exceeds the pipeline normal operating pressure -- which would indicate the volume of RNG injected exceeds the demand on the pipeline system -- the RNG injection rate is deemed infeasible, and no additional scenarios are run.

For scenarios that are deemed feasible in the Design Day model, however, the location and maximum injection rate are next loaded into the 65-degree model, which represents typical summer operations on the LG&E system at 65° F, or warmer. As described above, the scenario is again run in the model. The model determines a required discharge pressure at the injection point. If the calculated discharge pressure exceeds the pipeline normal operating pressure -- which would indicate the volume of RNG injected exceeds the demand on the pipeline system -- the RNG injection rates is deemed infeasible, and then no additional scenarios are run.

LG&E does not perform a more detailed customer impact analysis unless a site is determined to be hydraulically feasible in the Design Day and 65-degree models.

LOUISVILLE GAS AND ELECTRIC COMPANY

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Question No. 4

Responding Witness: Tom C. Rieth

- Q-4. Confirm that the Btus correctly provided for in the proposed tariff eliminate the transport of RNG unless the producer used an additive to increase the heating value. If not confirmed, explain why not.
- A-4. Confirmed. An RNG producer would have to inject a higher BTU gas (such as propane) to meet the minimum 1,035 BTU/scf specification proposed for Rate LGDS transportation service.