

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

In the matter of: :

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

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**LOUISVILLE/JEFFERSON COUNTY METROPOLITAN SEWER  
DISTRICT'S SUPPLEMENTAL REQUEST OF INFORMATION TO  
LOUISVILLE GAS AND ELECTRIC COMPANY**

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Comes the Louisville/Jefferson County Metropolitan Sewer District (“MSD”), 700 West Liberty Street, Louisville, Kentucky 40203, by counsel and intervener in this action, and respectfully requests the applicant, Louisville Gas and Electric Company (the “Company”), to respond to the Supplemental Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.

B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit MSD to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

#### Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means the Company or the witness, as the context requires.
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Company or its officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.
3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or

attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief

that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

#### **SUPPLEMENTAL REQUEST FOR INFORMATION OF MSD**

Q. 2-1 When LG&E states local customers would be required to purchase 7% more gas due to the lower heating value of RNG compared to fossil gas supplies (response to PSC Staff Q-1(b)), does this ignore effects of blending and diffusion within the local pipeline and assume customers connected near RNG producers would receive 100% RNG?

Q. 2-2 Does LG&E have any empirical data or case studies which show RNG may significantly affect the quality of pipeline gas delivered to local customers?

Q. 2-3 Has LG&E considered alternative solutions or special circumstances that would rectify concerns about adverse effects to local customers without increasing the heating value requirement to a level that is infeasible to meet by RNG, such as an RNG provider purchasing about the same amount of gas from the distribution system as they produce?

Q. 2-4 Would accepting RNG reduce the amount of fossil natural gas that LG&E purchases from interstate suppliers and transports through their gas grid?

Q. 2-5 In regard to the "RNG Quality Verification and Monitoring Program" (Attachment 2 to Response to PSC-1 Question No. 7(b)), have the proposed terms and conditions ever been accepted and utilized by an RNG producer in an actual application?

Q. 2-6 Did LG&E or its consultants develop any cost estimates or consider costs impacts to RNG providers for the blending systems proposed? Also, were operational, safety, regulatory or other impacts to the RNG provider for the recommended additional blending systems evaluated beyond the gas quality impacts to the natural gas utility?

Q. 2-7 The Entrust Solution report states: “No universal solution exists for how operators should handle the potential impacts of RNG injection on gas quality, heat content, and gas interchangeability. Every situation is unique – from regulatory compliance in the local jurisdiction to producer relationships and interconnect agreements, from the size and complexity of the gas distribution system to the quality of biomethane produced.” Given this statement, does LG&E intend to develop terms and conditions for RNG connections to their distribution system(s) on a case-by-case basis, evaluating the impacts noted above for each application or do they intend to implore a “one size fits all” approach by requiring a blanket minimum RNG gas quality requirement for all RNG providers in all cases? For example, in many wastewater RNG applications where biosolids dryers are used, the dryer natural gas demand exceeds the plant’s RNG production. Inasmuch the interconnect can be designed so that the majority of the RNG produced will not go beyond the interconnection site; thus, the impact from lower BTU RNG can be isolated and can be controlled.

Respectfully submitted,

/s/Matt Malone

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METROPOLITAN SEWER DISTRICT

### **CERTIFICATE OF SERVICE**

I hereby certify that MSD’s June 13, 2024 electronic filing is a true and accurate copy of MSD’s pleading and Read 1<sup>st</sup> Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on June 13, 2024; that an original and one copy of the filing will not be mailed to the Commission given the pandemic orders; that there are currently no parties excused from participation by electronic service; and that, on June 13, 2024, electronic mail notification of the electronic filing is provided to all parties of record.

/s/Matt Malone

ATTORNEY FOR LOUISVILLE/JEFFERSON COUNTY

METROPOLITAN SEWER DISTRICT