

**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 MOTION FOR A HEARING**

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Comes the Louisville/Jefferson County Metropolitan Sewer District (“MSD”), 700 West Liberty Street, Louisville, Kentucky 40203, by counsel, pursuant to the April 30, 2024 Order (“April 30<sup>th</sup> Order”) of the Kentucky Public Service Commission (“Commission”) and other applicable law, and for its Motion a Hearing in this case and respectfully states as follows:

The Commission’s April 30<sup>th</sup> Order set forth the procedural schedule for this proceeding. The Commission issued its initial set of information requests on May 14, 2024, which were answered by Louisville Gas & Electric Company (“LG&E”) on May 30, 2024. Additionally, MSD sought timely intervention and was granted intervention in this proceeding on May 17, 2024. LG&E also responded to initial information requests from MSD on May 30, 2024. The Commission and MSD issued supplemental information requests on June 13, 2024, which were answered by LG&E on June 27, 2024. MSD filed intervener testimony in this case on July 3, 2024. MSD then responded to requests for information from LG&E and the Commission on July 31, 2024. The Commission also issued a third set of information requests to LG&E on July 17, 2024 which were answered on July 31, 2024. The April 30, 2024 Order allows MSD to request or waive a hearing on or before August 14, 2024.

MSD believes that a hearing is necessary to fully address this case. The requested tariff change has substantial impact on the Morris Forman Water Treatment Quality Center (“Morris

Forman”) by eliminating the viability of using renewable natural gas (RNG). There are public comments, dated August 14, 2024 filed with the Commission, from the Coalition for Renewable Natural Gas (“RNG Coalition”) addressing that members of the RNG Coalition are exploring RNG projects in Kentucky including in LG&E’s territory. The RNG Coalition has raised concerns about LG&E’s amended tariff impacting the viability of RNG projects which in turn impacts economic development in the Commonwealth if the amended tariff is approved. The RNG Coalition’s public comments also include information addressing successful RNG injection sites across the country with relevant heating values contrary to LG&E’s position. MSD believes a hearing is appropriate to address this case.

WHEREFORE, on the basis of the foregoing, MSD respectfully moves the Commission to schedule a hearing in this matter.

This 14<sup>th</sup> day of August 2024.

Respectfully submitted,

*/s/Matt Malone*

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Counsel for the Petitioner,

LOUISVILLE/JEFFERSON COUNTY

METROPOLITAN SEWER DISTRICT

**CERTIFICATE OF SERVICE**

I hereby certify that MSD's August 14, 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 August 14, 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 August 14, 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