

Commonwealth of Kentucky
Before the Public Service Commission

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COMMISSION

In the Matter of:

Louisville/Jefferson County Metro Government)

Complainant,)

v.)

Louisville Gas and Electric Company)

Defendant.)

Case No.
2016- 00347

LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT
ADDENDUM TO AMENDED COMPLAINT

Comes now The Louisville/Jefferson County Metro Government ("Louisville Metro"), hereby gives notice of the following addendum to the Louisville Metro Amended Complaint. The addendum includes two maps: one demonstrating the Louisville Gas and Electric Co. ("LG&E") Jefferson County Gas Mains, and the second demonstrating Gas Transmission in Kentucky, 1984. Both maps will be filed with the Commission under confidential seal, but only the first map will be provided to those parties on the service list due to limitations placed upon Louisville Metro when it received the 1984 Gas Transmission map.

The first map is titled Jefferson County Gas Mains and provides the locations of LG&E's transmission and distribution mains throughout Jefferson County. For the sake of continuity with the Amended Complaint, Louisville Metro has designated this map Amended Complaint Exhibit 10. While the map key does not provide any additional information, judging from the location of the black lines on the map, it appears the Exhibit 10 also contains the location of interstates 64, 65, 71, 264, and 265. Analyzing this map in conjunction with Exhibit 2, which provides the locations of municipalities within Jefferson County, demonstrates that all the

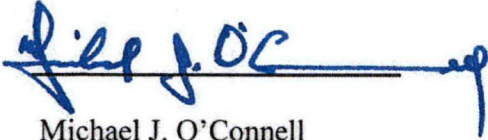
municipalities located within Jefferson County receive natural gas service by utilizing Louisville Metro's rights-of-way. Additionally, this map demonstrates that transmission lines located within Louisville Metro exit Jefferson County and enter neighboring counties.

The second map is titled Gas Transmission in Kentucky and is dated 1984. For the sake of continuity with the Amended Complaint, Louisville Metro has designated this map Amended Complaint Exhibit 11. This map contains the location of gas transmission lines throughout Kentucky and provides the owner of those lines. Based on the information in Exhibit 11 it appears that LG&E gas lines originating in Jefferson County are passing through or terminating in Oldham, Henry, Nelson, Bullitt, Marion, L&arue, Hart, Barren, Metcalfe, Green, and Trimble Counties. This information combined with the information in Exhibits 10 and 4 presents a *prima facie* case that all LG&E gas customers receive their gas through mains located under Louisville Metro rights-of-way.

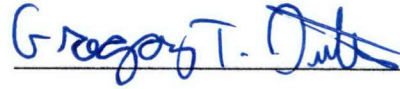
The information contained in the Amended Complaint and this Addendum meets the requirements of 807 KAR 5:001, Section 20(1) and establishes a *prima facie* case. Any additional information the Commission seeks can and should be obtained from LG&E through discovery following the Commission issuing an Order requiring LG&E to respond to the Louisville Metro Amended Complaint.

WHEREFORE, Louisville Metro respectfully requests that the Commission accept this Addendum and make a determination the Amended Complaint meets the requirements of 807 KAR 5:001, Section 20(1) and establishes a *prima facie* case.

Respectfully submitted,




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CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of this document has been served via electronic mail to the persons listed below.



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