

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE	)	
GAS AND ELECTRIC COMPANY FOR	)	CASE NO.
APPROVAL OF REVISED GAS LINE TRACKER	)	2021-00091
RATES EFFECTIVE FOR SERVICES	)	
RENDERED ON AND AFTER MAY 1, 2021	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company (LG&E), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on April 19, 2021. The Commission directs LG&E to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E shall make timely amendment to any prior response if LG&E obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E fails or refuses to furnish all or part of the requested information, LG&E shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, LG&E shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, Exhibits 1–4. Provide an electronic version of these spreadsheets in Excel spreadsheet format with all formulas, row, and columns unprotected and fully accessible.

2. For each completed distribution project for which LG&E has recovered or is recovering its costs through its Gas Line Tracker (GLT) rates provide:

- a. The date of completion;
- b. The total number of mains, service lines, or risers that were replaced;

- c. The approximate number of miles of pipe associated with the completion;
  - d. The final cost of the project; and
  - e. A comparison of LG&E's projected cost and the final actual cost.
3. Confirm the Transmission Pipeline Modernization Program (TMP) has been completed and provide:
  - a. The date of completion;
  - b. The approximate number of miles of pipe associated with the completion;
  - c. The final cost of the project; and
  - d. A comparison of LG&E's projected cost and the final actual cost.
4. If Item 3 cannot be confirmed, provide:
  - a. An estimated date of completion;
  - b. Estimated costs of completion;
  - c. Estimated number of miles of pipe associated with completion; and
  - d. A comparison of LG&E's original projected cost with its current projected cost of completion.
5. For the Steel Service Replacement Program approved in Case No. 2016-00371,<sup>2</sup> provide:
  - a. The number of steel service lines, county loops, and steel curbed services replaced to date;

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<sup>2</sup> Case No. 2016-00371, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity*, (Ky. PSC June 22, 2017).

- b. The number of steel service lines, county loops, and steel curbed services remaining to be replaced;
- c. The total cost of the project to date;
- d. The estimated total cost of completion; and
- e. A comparison of LG&E's original projected cost with its current projected cost of completion.

6 For the Customer Service Line Replacement project approved in Case No. 2012-00222,<sup>3</sup> provide:

- a. The number of service lines replaced to date;
- b. The costs to date associated with the program; and
- c. The estimated number of customer-owned service lines still to be replaced.

7. State whether LG&E intends to continue the Customer Service Line Replacement project approved in Case No. 2012–00222 as only a reactive project, or plans to include a systematic replacement of customer-owned service lines in addition to the reactive replacement of service lines in the future.

8. If LG&E intends to continue the Customer Service Line Replacement project as a reactive project only, state the reason a more systematic approach is not being considered as well.

9. Refer to the Application, Exhibit 4, pages 4–16 of 18. Page 4 of 18 is a summary of forecasted monthly capital and operating costs for 2021. On pages 5–16 of

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<sup>3</sup> Case No. 2012-00222, *Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, a Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Lines and Risers and a Gas Line Surcharge*, (Ky. PSC Dec. 20, 2012).

18, column 6 contains monthly additions of plant. The Mains-Transmission Capex information listed on line 2 of page 4 of 18 does not match the information contained in the monthly forecasts in column 6 on pages 5–14 of 18.

a. Provide an explanation, reconciliation, and updated Exhibit 4 with the correct information.

b. Provide the details and support for the proposed Mains-Transmission figure listed on line 2, column 6, pages 5–16 of 18.

c. Refer to pages 5–16 of 18. Provide an analysis of the Retirements, Total Plant, and Cost of Removal for each month.

10. Refer to the Application, Exhibit 4, page 17. Reconcile the columns 2017 additions, 2018 additions, 2019 additions, and 2020 additions with Exhibit 4, page 17, from Case No. 2020–00032.<sup>4</sup>

11. Identify generally the locations of the major main replacements that were made in 2020, the miles of line replaced, and describe how those specific locations and projects were selected and prioritized.

12. Identify generally the locations of the major main replacements that are going to be made in 2021, provide the proposed miles of line to be replaced, and describe how those specific locations and projects will be prioritized.

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<sup>4</sup> Case No. 2020-00032, *Electronic Application of Louisville Gas and Electric Company for Approval of Revised Rates to be Recovered Through its Gas Line Tracker Beginning with the First Billing Cycle for May 2020*, (Ky. PSC Feb. 28, 2020).

13. State how many gas risers LG&E has replaced to date, and state how many riser replacements LG&E estimates remain.

14. Provide how many miles of main replacements, service line replacements, and customer service replacements LG&E projects there will be left to replace through the GLT by the end of 2021.

15. Provide an analysis as to whether LG&E projects it will complete its main replacements, service line replacements, and customer service replacements according to the original schedule as approved in Case No. 2016-00371<sup>5</sup> and subsequently updated in Case No. 2018-00295,<sup>6</sup> and compare its current projections of the total cost of its GLT program as originally approved and amended.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED APR 08 2021

cc: Parties of Record

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<sup>5</sup> Case No. 2016-00371, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity*, (Ky. PSC June 22, 2017).

<sup>6</sup> Case No. 2018-00295, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates*, (Ky. PSC Apr. 30, 2019).

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