

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)	

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, shall file with the Commission an electronic version of the following information. The information requested is due on May 30, 2024. The Commission directs LG&E to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 preparer or the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 March 29, 2024 LG&E letter to Linda Bridwell.
 - a. For each potential customer with whom LG&E has been in discussion regarding the delivery of renewable natural gas (RNG), provide the expected volumetric amount of RNG that will be delivered to LG&E from that customer on a daily and annual basis.

b. Explain how the revised total heating value would impact the cost of the delivery service.

2. Refer to the March 29, 2024 LG&E letter to Linda Bridwell. Explain whether LG&E is aware of any facilities capable of producing RNG that already have pipelines capable of connecting, or are already connected, to its existing pipelines. If so, provide a map indicating LG&E's pipelines and the locations of these facilities.

3. Refer to the March 29, 2024 LG&E letter to Linda Bridwell. Explain whether there is a minimum volume requirement that must be met by local gas suppliers before LG&E will purchase the gas.

4. Refer to LG&E's proposed tariff revisions, P.S.C. Gas No. 13, First Revision of Original Sheet No. 36.

a. Explain why LG&E gas received by means other than pipeline will not be considered local gas.

b. Define "virtual pipeline."

c. Explain whether LG&E is capable of accepting gas currently by virtual pipeline. If not, describe what actions would have to be taken in order to accept local gas via virtual pipeline.

5. Refer to LG&E's proposed tariff revisions, P.S.C. Gas No. 13, First Revision of Original Sheet No. 36.

a. Explain whether local gas is required to be of pipeline quality (Btu, moisture, absence of sulfur or other hazardous compounds, etc.) at the point of receipt into LG&E's pipeline facilities.

b. Define “hazardous waste” and the sources, or potential sources, of local gas produced from hazardous waste.

6. Refer to LG&E’s proposed tariff revisions, P.S.C. Gas No. 13, First Revision of Original Sheet No. 36.


a. Explain why it is necessary to exclude gas delivered by transportation methods other than a pipeline from the definition of local gas.

b. To the extent LG&E is aware, identify any other utilities that exclude gas delivered by transportation methods other than a pipeline from the definition of local gas.

7. Refer to LG&E’s proposed tariff revisions, P.S.C. Gas No. 13, First Revision of Original Sheet No. 36.11 and First Revision of Original Sheet No. 36.12.

a. Provide an explanation of the rationale for each revision to the gas quality specifications.

b. Provide any studies LG&E performed, or relied upon, to arrive at the revised gas quality specifications.



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

DATED MAY 14 2024

cc: Parties of Record

*Honorable Allyson K Sturgeon
Managing Senior Counsel - Regulatory &
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Michael Hornung
Manager, Pricing/Tariffs
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

*Monica Braun
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Sara Judd
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202