

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 SECOND 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 June 27, 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 LG&E's response to Commission Staff's First Request for Information (Staff's First Request), Item 5a. Explain whether the verification tests to ensure natural or manufactured gas (gas) quality specifications for LG&E are the same tests and specifications required for authorization to inject gas into interstate pipelines. If not, explain the similarities and differences of the tests.

2. Refer to LG&E's response to Staff's First Request, Item 7b, REEthink report, Section 4, pages 8-9. Explain whether LG&E will conduct or currently conducts its own testing and monitoring of gases taken from interstate pipelines prior to entering its pipeline system.

a. If so, explain its testing protocols and procedures.

b. If not, explain how LG&E will verify the veracity of third-party test verification results from renewable natural gas (RNG) producers. Include in the response whether there are industry gas testing vendors that are commonly considered reliable in the gas utility industry.

c. Explain the approximate volume of RNG necessary to make the business case for LG&E to invest in the facilities necessary to take local RNG gas.

3. Refer to LG&E's response to Louisville/Jefferson County Metropolitan Sewer District First Information Request, Item 11.

a. Explain whether LG&E, the local distribution company (LDC), would purchase RNG for retail customer heating, cooking, or other commercial purposes.

b. Explain which customers/customer classes, if any, are eligible to purchase local RNG from LG&E or from the local RNG supplier where LG&E is the RNG transporter. If there are any customers/customer classes able to purchase local RNG, provide a reference to the tariff(s) under which such the sales occur.



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DATED JUN 13 2024

cc: Parties of Record

Case No. 2024-00125

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