

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 POST-HEARING REQUEST FOR INFORMATION  
TO LOUISVILLE/JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT

Louisville/Jefferson County Metropolitan Sewer District (MSD), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than November 27, 2024. The Commission directs MSD to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

MSD shall make timely amendment to any prior response if MSD 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 MSD fails or refuses to furnish all or part of the requested information, MSD 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, MSD 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 Corrected Rebuttal Testimony of Tom C. Rieth, on behalf of Louisville Gas and Electric Company (LG&E), along with exhibit TCR-1 filed in the confidential record. Assuming the impacts represented in the four scenarios are valid, explain whether MSD believes that the attendant increase to customer bills is reasonable if customers must use more gas to achieve the same heating value to meet the needs of their gas-burning appliances.

2. Refer to LG&E's response to Commission Staff's Fourth Request for Information, Item 1.

a. Explain whether MSD has undertaken an engineering analysis as contemplated on page 10 of this agreement.

b. Confirm that MSD would be unable to comply with the credit section as referenced on page 14 of this agreement. If not confirmed, explain why not.



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Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED NOV 13 2024

cc: Parties of Record

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