

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 AND JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT

Louisville and 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 on July 31, 2024. The Commission directs MSD 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.

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 Direct Testimony of W. James Gellner (Gellner Direct Testimony), page 3, lines 1–8, and page 4, lines 5–21.

a. Explain whether MSD has a renewable vehicle fuel buyer for its RNG.

b. Explain whether the renewable vehicle fuel buyer has RNG quality parameters that must be met by MSD.

c. Compare and explain any similarities and differences between the RNG eligible for use as renewable vehicle fuel, for the uses contemplated in Louisville Gas and Electric Company's (LG&E) proposed tariff, and those of interstate pipeline quality gas.

d. If not answered above, explain whether motor vehicle engines could operate effectively and efficiently burning RNG of the quality produced by MSD's Renewable Natural Gas Project, but below the quality required by LG&E's proposed tariff.

2. Refer to the Gellner Direct Testimony, page 4, lines 5–21.

a. Explain whether the heating value of MSD's RNG is such that it is of interstate pipeline quality, including heating value and the absence of other contaminants and potentially corrosive substances.

b. Explain whether the heating values of MSD's RNG is the only issue preventing it from potentially being transported via LG&E's pipelines.

c. Provide all test results and any other documentation demonstrating that the RNG is of pipeline quality such that absent transporting the gas through LG&E's pipelines, MSD's RNG could be transported through an interstate pipeline.

3. Refer to the Gellner Direct Testimony, page 4, lines 34–38. Explain the volume of RNG MSD expects to produce annually.

a. Identify MSD's expected average household usage of RNG.

b. Identify the number of households that MSD expects to supply RNG to on an annual basis.

4. Refer to the Gellner Direct Testimony, page 5, lines 25–34. Provide the average heating values of RNG produced from the various sources enumerated in the response.

5. Refer to the Gellner Direct Testimony, page 5, lines 36–50. Provide copies of all correspondence with LG&E regarding the RNG project.

6. Assume that MSD’s RNG is eligible for LG&E’s LGDS transportation service.

a. Explain the volume MSD anticipates it would produce for transport and sale. Include in the response the estimated size and description of truck envisioned to be used for transport and the number of trucks per month.

b. Explain how MSD would certify that its RNG was of pipeline quality for acceptance by LG&E.

c. Explain how MSD would transport its RNG to LG&E’s system. Include in the explanation whether the RNG will be pressurized and condensed in a manner similar to liquefied natural gas (LNG).

7. Explain whether MSD has explored business case alternative uses of RNG. Examples could include use for facilities heating or behind the meter electric generation, both of which could presumably reduce MSD’s energy or electricity bills.

8. Explain how MSD transports, stores and provides its RNG currently.

9. If MSD proposes to inject RNG into LG&E’s pipelines, provide a table and a map identifying the specific RNG injection points where MSD anticipates injecting its RNG into LG&E’s pipelines and the specific points in LG&E’s system where its RNG

customers will receive gas. Include in the response MSD's anticipated monthly RNG volumes for delivery into LG&E's system.



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DATED JUL 17 2024

cc: Parties of Record

Case No. 2024-00125

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