



a PPL company

LG&E and KU Services Company
Tom Rieth
6900 Enterprise Drive
Louisville, KY 40214
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July 29, 2025

VIA eMail

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: Notice of Amendment, CPF 1-2025-023-NOA

Dear Mr. Burrough:

Louisville Gas and Electric Company ("LG&E") received the July 1, 2025, Notice of Amendment, CPF 1-2025-023-NOA, ("NOA") addressing findings from the Pipeline and Hazardous Materials Safety Administration ("PHMSA") review of LG&E's underground natural gas storage facility procedures for the Magnolia Upper Storage Field in Larue County, Kentucky. In the NOA, PHMSA describes two apparent inadequacies identified as a result of the inspection. LG&E provides the following revisions to its procedures in response to the NOA.

A. Response to Alleged Inadequacies

(1) Inclusion of a Training Requirement for Underground Storage Operating Personnel

Based on the alleged inadequacy described in the NOA, LG&E has modified its Storage Integrity Management Plan ("SIMP") to include a training requirement for underground storage operating personnel prior to the implementation of procedural changes as required by section 11.12.2 in American Petroleum Institute's Recommended Practice 1171 (2015) (API RP 1171). Specifically, language was added to Section 16.1 of the SIMP requiring storage operating personnel to be trained as a part of the LG&E Management of Change ("MOC") process, and for training records to be attached to the MOC. The modified SIMP was approved through the LG&E MOC process with an effective date of July 25, 2025. The modified SIMP is attached to this response in accordance with the instructions in the NOA.

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(2) Quantifiable Criteria for Evaluation of Wells Without Annular Ports and Remediation

Based on the alleged inadequacy described in the NOA, LG&E has modified LG&E's *Gas Operation, Maintenance, and Inspection Manual Monitoring Gas Storage Wells Annular Areas* ("GOMI-SO-MA-004") to incorporate additional language around triggers for an evaluation for wells without annular ports. Section 10.2.3 has been revised to remove the threshold of "creates an unsafe work area" and instead insert quantifiable criteria for identifying hazardous and non-hazardous leaks.

In addition, to respond to the alleged inadequacy in NOA, LG&E have added a new Section 11.7 to GOMI-SO-MA-004 that provides a detailed description of investigation and remediation activities to be performed to remediate hazardous leaks to the non-hazardous conditions.

The modified GOMI-SO-MA-004 was approved through the LG&E MOC process with an effective date of July 25, 2025. The modified GOMI-SO-MA-004 is attached to this response in accordance with the instructions in the NOA.

B. Communications

To ensure an efficient and expedient response, please send any further communications on this matter to the following individuals:

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C. Conclusion

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We appreciate PHMSA's time and attention to detail given in the review of underground storage procedures, as well as the feedback from the inspection team. LG&E believe that the revisions to the LG&E SIMP and GOMI-SO-MA-004 address the alleged inadequacies with the procedures identified in the NOA. Please let us know if you have any questions or need any additional information.

Sincerely,

A handwritten signature in blue ink that reads "Tom Rieth". The signature is written in a cursive, slightly stylized font.

Tom Rieth