



**CARROLLTON UTILITIES**

P.O. BOX 269  
CARROLLTON, KENTUCKY 41008  
PHONE: 502-732-7055  
FAX: 502-732-7058

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COMMISSION

September 14, 2015

Mr. Jeff DeRouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40601

RE: *In the Matter of Carrollton Utilities*  
Case No. 2015-00178

Dear Mr. DeRouen:

In reference to the Intra-Agency Memorandum regarding the informal conference held at the Kentucky Public Service Commission's office on September 10, 2015, between Carrollton Utilities and Commission staff, Carrollton Utilities offers the following information to supplement the record.

During the informal conference discussions were held concerning the remedial measures Carrollton Utilities performed to ensure its staff is familiar with pipeline safety regulations related to the definition of an "incident" and the associated reporting requirements. In this regard, Carrollton Utilities identified the erroneous filing of the PHMSA F7100.1 Form for the event (non-reportable incident) of May 27, 2014 as an area where additional training should be focused.

Carrollton Utilities staff, including its General Manager, Engineer, Gas Superintendent, Plant Superintendent, and other key emergency response personnel, participated in a series of meetings to review all the components of an emergency response. The following is a list of topics and items discussed during these meetings:

1. Recognition and Response to an Abnormal Operating Condition ("AOC")
2. Accessing the AOC
3. Procedures to Request Resources
4. Definition of "Incident"
5. Notification and reporting to USDOT in accordance with 49 CFR Part 191
6. Commission's Memo of March 16, 2015 to all Jurisdictional Natural Gas Utilities and Operators
7. Customer Notification Procedures

Carrollton Utilities staff spent a considerable amount of time reviewing the applicability of the PHMSA F7100.1: Incident Report-Gas Distribution Systems Form and its corresponding Instructions (rev 10-2014). In addition to the meetings with staff, Carrollton Utilities presented a summary of the emergency response procedures to the Carrollton Utilities Commission during a regular board meeting.

Carrollton Utilities views Commission staff as a valuable resource in compliance with all requirements of 49 CFR Part 191 and 192. We believe early and ongoing communication with Commission staff, especially during events such as that of May 27, 2014, is crucial to the safe operation of our system in compliance with applicable pipeline safety regulations.

Also, the last sentence of the fourth paragraph of the informal conference memorandum states:

The parties also discussed the reporting obligations of a non-jurisdictional gas pipeline operator such as Carrollton.

For clarification of the record, Carrollton Utilities is a jurisdictional gas pipeline operator subject to federal pipeline safety regulations, but not state pipeline safety regulations because it is not a "utility" as defined in KRS 278.010(3).

Thank you for the opportunity to submit this supplemental information. Should you have any further questions, please contact me at (502) 732-1215 or by email at [bosborne@carrolltonutilities.com](mailto:bosborne@carrolltonutilities.com).

Sincerely,

CARROLLTON UTILITIES

By 

Bill R. Osborne, P.E.  
General Manager