

refuses to furnish all or part of the requested information, Delta shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied 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, Delta shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify the general locations of the major main replacements that occurred in 2015, and describe how those specific projects were selected and prioritized.

2. Provide a list of the remaining items to be replaced and an estimate of the associated costs eligible to be recovered through the Pipe Replacement Program ("PRP") as originally enumerated by Delta in Case No. 2010-00116.¹ The information should include:

- a. The amount of pipe remaining to be replaced through the PRP. Pipe should be categorized by material (i.e. bare steel, coated steel, etc.); age; size; and location.

- b. The number of services remaining to be replaced through the PRP.

¹ Case No. 2010-00116, *Application of Delta Natural Gas Company, Inc. for an Adjustment of Rates* (Ky. PSC Oct. 21, 2010). See Direct Testimony of John B. Brown at 8–12.

c. The number of years Delta expects to use the PRP mechanism to recover the cost of bare and coated steel pipes along with associated services.

d. The estimated remaining cost per year of the PRP, broken down by pipe, services, and any other eligible PRP activities.

James W. Gardner

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P.O. Box 615
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DATED **MAR 31 2016**

cc: Parties of Record

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