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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

MAR 22 2017

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COMMISSION

In the Matter of:

CITY OF LIBERTY GAS COMPANY)
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)

CASE NO. 2017-00053

ALLEGED FAILURE TO COMPLY WITH)
KRS 278.492 AND 49 C.F.R. PART 192)

**CITY OF LIBERTY’S LIST OF ANTICIPATED WITNESSES AND EXHIBITS
FOR AN EVIDENTIARY HEARING**

The City of Liberty (“City”),¹ by counsel, provides the following witness and exhibit list for an evidentiary hearing to be held in this matter.

The City anticipates that it will call City Clerk Bridgett Blake and Mayor Steven Brown as witnesses. It is anticipated that Blake will testify on the following topics:

- Blake’s positions with the City, including her current role as City Clerk and additional duties;
- the City of Liberty and its gas department, including its size, organization, and operations;
- the City’s understanding of historical facts relevant to this matter, including knowledge of any leakage surveys and the Commission inspections;
- efforts to correct any deficiencies, including internal steps taken to ensure leakage surveys are conducted in the future;
- the failure of the City to receive the Commission’s Order dated February 6, 2017, in this matter when it was originally issued;

¹ The City’s gas system is a department of the City. The City of Liberty Gas Company is not a separate entity.

- generally, the adequacy, safety, and reasonableness of the City's practices related to conducting periodic leakage surveys of its gas distribution system as they relate to the facts of this case and whether such practices require revision; and
- any records that the City has in its possession related to leakage surveys.

It is anticipated that Mayor Brown will testify on the following topics:

- Mayor Brown's position with the City;
- how he and the City have taken steps to ensure leakage surveys of the City's system will be conducted in the future;
- the City's budget; and
- the City's interest in compliance with regulations in the future.

The City reserves the right to amend this witness list, in the interest of due process, for rebuttal purposes or for cross-examination, if necessary.

The City anticipates that it will introduce the following exhibits at an evidentiary hearing in this matter:

- City of Liberty's Operations and Maintenance Plan for its gas system;
- City's Contract with Heath Consultants, including the Option to Renew;
- Report by Heath Consultants completed in 2016;
- December 2016 emails to/from a representative from Heath confirming that the City had an option to renew and that Heath would perform future leakage surveys;
- March 2017 emails to/from a representative from Heath indicating that Heath should be able to perform the leakage surveys in early August 2017;
- City's Calendar for gas system-related events; and
- Commission's Order of February 6, 2017.

The City may also introduce the 2012 and 2015 reports from the Commission inspections, but it understands that the Commission Staff plans on introducing those documents as exhibits prior to

the City's presentation of witnesses and exhibits. The City reserves the right to introduce any document for the purposes of cross-examination and redirect examination of witnesses depending on the responses of the witness.

Respectfully submitted,



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