

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|--------------------------------|---|------------|
| 2020 SAFETY MODIFICATION AND |) | CASE NO. |
| REPLACEMENT PROGRAM FILING OF |) | 2019-00383 |
| COLUMBIA GAS OF KENTUCKY, INC. |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of entry of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response 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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Columbia Kentucky shall make timely amendment to any prior response if it contains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Columbia Kentucky fails or refuses to furnish all or part of the requested

information, it shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

Careful attention shall 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, Columbia Kentucky 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 application, SMRP Form 2.0, page 1 of 3. For the forecasted plant additions, retirements, and removals for 2020, provide the following separately by project:

- a. Location;
- b. Number, length, and size of mains and service lines;
- c. Associated costs;
- d. Projected construction start date;
- e. Projected month of completion;
- f. Type of material removed; and
- g. Explain in full detail the specific safety issue that each proposed

project is addressing.

2. Refer to the application, SMRP Form 2.0, pages 1 and 2 of 3, and the Commission's final Order in Case No. 2019-00257¹ (2019-00257 Order), pages 16–17. Confirm that Columbia Kentucky did not include costs associated with the Low Pressure Program incurred before the date of the 2019-00257 Order. If this cannot be confirmed, identify the location and amounts of those costs.

3. Refer to the application, SMRP Form 2.0, page 3 of 3, and Case No. 2019-00097,² AMRP Form 2.0. Explain the differences in column "2018 Additions & Retirements."

4. Refer to the application, SMRP Form 3.0, and Case No. 2019-00257, Columbia Kentucky's response to Commission Staff's First Request for Information, Item 5. Explain whether "Projected 2020 O&M Account 887 Costs" include projected increases in operations and maintenance (O&M) expenses attributable to the low-pressure gas distribution system safety enhancement program (LP Program) and, if so, provide the amount.

5. Provide an electronic copy of the application in Excel spreadsheet format with all formulas intact and cells unprotected.

¹ Case No. 2019-00257, *Electronic Application of Columbia Gas of Kentucky, Inc. for: 1) A Declaration that Construction of a Low Pressure System Safety Improvement is an Extension of its System in the Ordinary Course of Business; 2) In the Alternative, for the Issuance of a Certificate of Public Convenience and Necessity for Such Constructions; 3) Approval of an Amendment and Expansion of its Accelerated Main Replacement Tariff to its Safety Modification and Replacement Tariff; and 4) Approval to Modify the 2019 AMRP Construction Plan* (Ky. PSC Nov. 7, 2019).

² Case No. 2019-00097, *Electronic Accelerated Main Replacement Program Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC May 8, 2019), Order.


Gwen R. Pinson
Executive Director
Public Service Commission
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DATED NOV 20 2019

cc: Parties of Record

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