## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF KENTUCKY, INC. FOR A LIMITED DEVIATION FROM THE REQUIREMENTS OF 807 KAR 5:022, SECTION 14(22)(a)

) CASE NO. ) 2015-00084

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

Columbia Gas of Kentucky, Inc. ("Columbia Gas"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days from the date of this request. Responses to requests for information 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 Gas shall make timely amendment to any prior response if it obtains 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 Gas 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 completely and precisely respond.

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 document containing personal information, Columbia Gas shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Columbia's Response to Staff's Initial Request for Information ("Response"), Item 5, the first page of the attached four-page spreadsheet ("the Spreadsheet") which identifies the locations for which Columbia is seeking a deviation from 807 KAR 5:022, Section 14(22)(a).

a. Describe what is meant by the term "Station Number," as found at the top of the first column. Based on this description, how many "Station Numbers" does Columbia have?

b. Describe what is meant by the term "System Number," as found at the top of the second column. Based on this description, how many "System Numbers" does Columbia have?

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c. Describe what is meant by the term "System Name," as found at the top of the sixth column. Based on this description, how many "System Names" does Columbia have?

d. Describe what is meant by the term "Premise ID," as found at the top of the ninth column. Based on this description, how many "Premise IDs" does Columbia have?

e. Describe what is meant by the term "Station Location," as found at the top of the tenth column. Based on this description, how many "Station Locations" does Columbia have?

2. Refer to Columbia's Response, Item 5, page 1 of the Spreadsheet. Lines 7 and 8 both reference Station Number 1061 and have the same Station Location, but all other identifiers, including the System Number, Customer Number, Pipe Length, Pipe Size, System Name, MAOP, Normal Operating Pressure, and Premise ID, are different. Is the Station Number 1061 accurate for both? Explain.

3. Refer to Columbia's Response, Item 5, page 2 of the Spreadsheet.

a. Lines 17 and 18 both reference Station Number 1230 and have the same Station Location, but other identifiers, including the System Number, Customer Number, Pipe Length, Pipe Size, System Name, MAOP, Normal Operating Pressure, and Premise ID, are different. Is the Station Number 1230 accurate for both? Explain.

b. Line 17, Station Number 1230, lists an MAOP of 5 and normal operating pressure of 10 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

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c. Line 19, Station Number 1237, lists an MAOP of 10 and normal operating pressure of 100 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

d. Line 21, Station Number 1251 lists an MAOP of 20 and a normal operating pressure of 40 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

e. Line 24, Station Number 1277 lists an MAOP of 10 and a normal operating pressure of 38 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

f. Line 26, Station Number 1279, lists an MAOP of 10 and a normal operating pressure of 11 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

g. Line 36, Station Number 1405, lists an MAOP of 10 and a normal operating pressure of 35 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

4. Refer to Columbia's Response, Item 5, page 3 of the Spreadsheet. Line 22, Station Number 1585, lists an MAOP of 5 and a normal operating pressure of 41 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

5. Refer to Columbia's Response, Item 5, page 4 of the Spreadsheet.

a. Line 5, Station Number 1693, lists an MAOP of LP and a normal operating pressure of 10 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

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b. Line 7, Station Number 1695, lists an MAOP of LP and a normal operating pressure of 10 psig. Are these numbers accurate? If so, explain why the operating pressure exceeds the MAOP.

Refer to Columbia's Response, Item 5, page 4 of the Spreadsheet. Line
17, Station No. 803523, indicates that there are no customers being served. Is this correct?

7. Refer to Columbia's Response, Item 5, second sentence. Columbia states that changes in its "infrastructure since the application was filed and optimum identification of monitoring points has reduced the number of gauges sought in the deviation to 159 locations."

a. Describe the changes that occurred to Columbia's infrastructure to cause the reduction in the number of gauges sought in the deviation.

b. Explain what is meant by "optimum identification of monitoring points" and how this caused a reduction in the number of gauges sought in the deviation.

c. Does Columbia expect any further reductions in the number of gauges sought in the deviation? If so, identify the station number and explain.

d. Provide a detailed cost estimate for installing the pressure gauges at the 159 locations that Columbia has identified.

e. Provide a detailed cost estimate of the operations and maintenance expenses for the 159 pressure gauges.

8. Refer to Columbia's Response, Item 8. Of the locations for which a deviation is sought, provide which locations and the number of pressure surveys per

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location that Columbia conducted during winter operations for each of the previous five winters. Explain how the presence of permanent pressure-recording gauges, as required in 807 KAR 5:022, Section 14, would affect Columbia's winter operations planning at these locations.

9. Refer to Columbia's Response, Item 9. Columbia states that its station design considers the following items to comply with 49 CFR 192.741(b): 1) the pressure differential across the district station; 2) the number of valves in the by-pass; 3) the capacity of the station; 4) the presence of internal relief on the regulators; and 5) the presence of customers having large volume measurement equipment on the system. Explain each item and identify the threshold of each item at which Columbia determines a recording gauge is necessary. Explain whether Columbia considers the number of customers supplied.

Caron D. Grunnal for

Jeff Derouen Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

8 2015 DATED

cc: Parties of Record

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