

May 5, 2016

Acting Executive Director
Public Service Commission
Commonwealth of Kentucky
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

RECEIVED

MAY 06 2016

PUBLIC SERVICE
COMMISSION

RE: In the matter of the Application of Columbia Gas of Kentucky, Inc. for a
Limited Deviation from the Requirements of 807 KAR 5:022, Section 14(22)(a), PSC
Case No. 2015-00084

Dear Sir or Madame,

Enclosed for docketing with the Commission are an original and ten (10)
copies of Columbia Gas of Kentucky, Inc.'s Responses to the Commission's
Informal Conference Data Requests as well as Motion for Confidential
Treatment. Should you have any questions about this filing, please contact me at
614-460-5558.

Very truly yours,

Brooke E. Wanchuck (gmc)

Brooke E. Wanchuck
Assistant General Counsel

Enclosure

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MAY 06 2016

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

In the Matter of the 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

MOTION OF COLUMBIA GAS OF KENTUCKY, INC.
FOR CONFIDENTIAL TREATMENT OF DATA

Columbia Gas of Kentucky, Inc., ("Columbia") petitions the Kentucky Public Service Commission ("Commission") pursuant to 807 KAR 5:001 13 and KRS 61.878(1)(m)(1) to grant confidential protection indefinitely on information contained in one response to Commission Staff's Informal Conference Data Requests. Specifically, Columbia requests confidential treatment of portions of its response to Staff Informal Conference Data Request ("IC DR") 2, 5 and 6 . The information requested is highly confidential, proprietary and the disclosure of which would create a reasonable likelihood of threatening the public safety. For the reasons set forth herein, the responses should be given confidential treatment.

STAFF IC DR 2, 5 and 6.

Staff IC DR 2 asks Columbia to "provide an update of the spreadsheet that was attached to Columbia's response to Commission Staff's Initial Request for Information ("Staff's Initial Request") Item 5." Staff's Initial Request Item 5 asked Columbia to "[i]dentify each location for which a deviation from 807 KAR 5:022,

Section 14(22)(a), is sought.” On June 26, 2015, Columbia filed a Motion for Confidential Treatment of that data contained in its response to Staff Initial Request Item 5, arguing that the precise addresses of CKY’s distribution system and the locations for which deviation is sought should be classified as confidential pursuant to KRS 61.878 (1)(m)(1) because the disclosure of the information “would have a reasonable likelihood of threatening the public safety by exposing a vulnerability in preventing, protecting against, mitigation, or responding to a terrorist act. “

This Commission has recognized that maps “are infrastructure records that disclose the location, configuration or security of public utility systems” and therefore should be treated as confidential.¹ Consistent with the information contained in Columbia’s initial response, the updated information requested in IC DR 2, while not an actual map, contains the same identifying information that are included in maps and should be given the same confidential treatment. Similarly, the information contained in the attachments to the responses to IC DR 5 and 6 contain location information and should be treated as confidential.

By granting this Motion and providing for confidential treatment of Columbia’s responses to the aforementioned data request, the Commission can fully evaluate Columbia’s proposed Limited Deviation from the Requirements of

¹ Case No. 2014-000166 *In the Matter of 2014 Integrated Resource Plan of Big Rivers Electric Corporation*, KY PSC Order, p. 7 (August 26, 2014).

807 KAR 5:022, Section 14(22)(a), while maintaining the general confidentiality of such data, thereby balancing the public interest with the personal safety concerns identified in KRS 61.878(1)(m)(1). Columbia requests that the information be kept confidential indefinitely as Columbia does not foresee a time when this information would be non-confidential.

WHEREFORE, Columbia respectfully requests that the Commission issue an order authorizing the confidential treatment of Columbia's responses to the request described herein, pursuant to 807 KAR 5:001, Section 13.

Dated at Columbus, Ohio this 5th day of May 2016

Respectfully submitted,
**COLUMBIA GAS OF KENTUCKY,
INC**



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**COLUMBIA GAS OF KENTUCKY,
INC**

KY PSC Case No. 2015-00084
Staff's Informal Conference Request No. 1
Respondent: Gary Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
DATED MARCH 17, 2016**

1. Provide PDF copies of the three types of regulator station drawings presented and discussed.

Response:

Please see the three attachments.

EXHIBIT 1

TYPICAL INSTALLATION FOR A MULTI-SUPPLY DISTRIBUTION SYSTEM

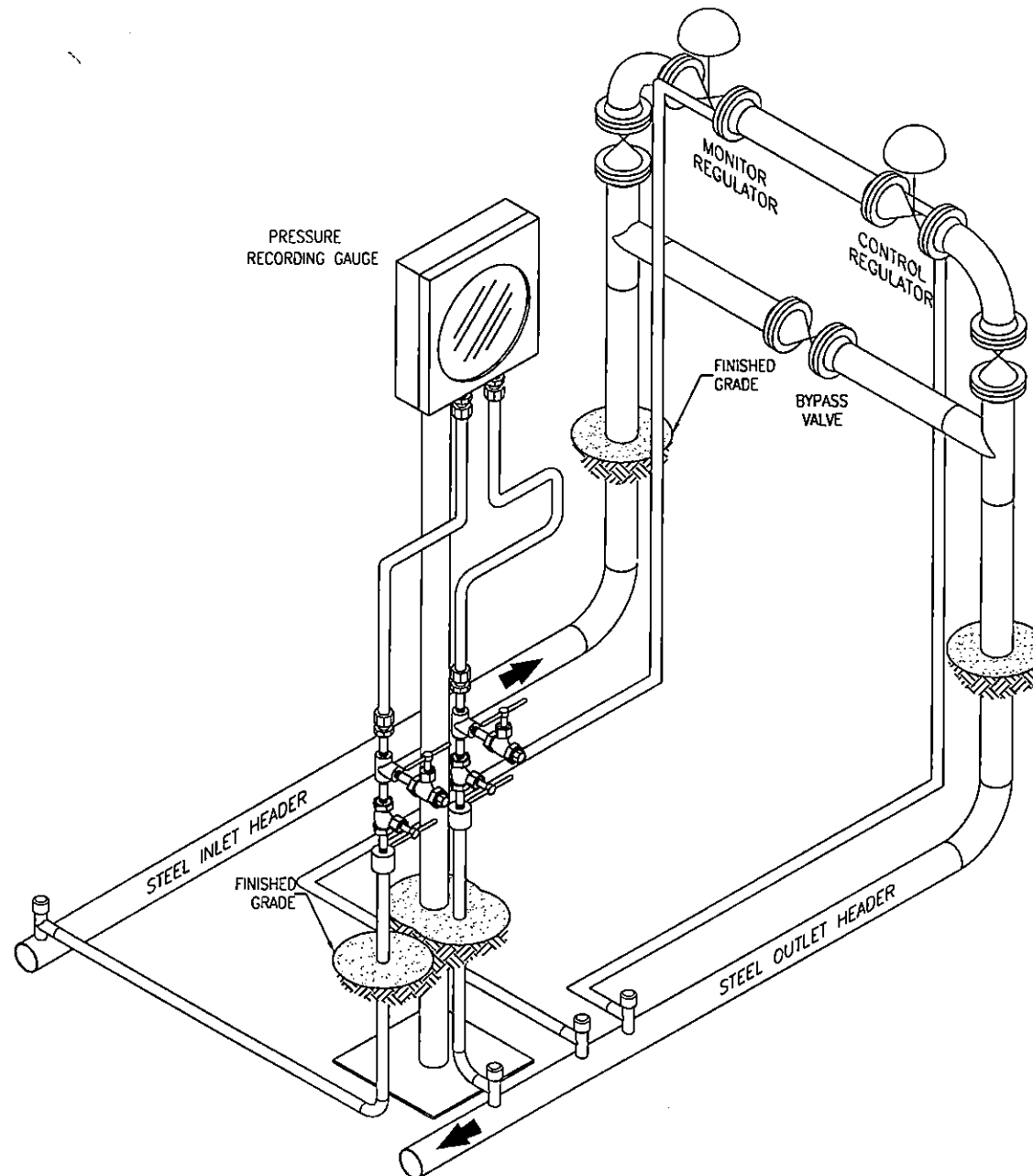


EXHIBIT 2

TYPICAL COLUMBIA INSTALLATION FOR A SINGLE SUPPLY DISTRIBUTION SYSTEM
THAT SUPPLIES LESS THAN 100 CUSTOMERS

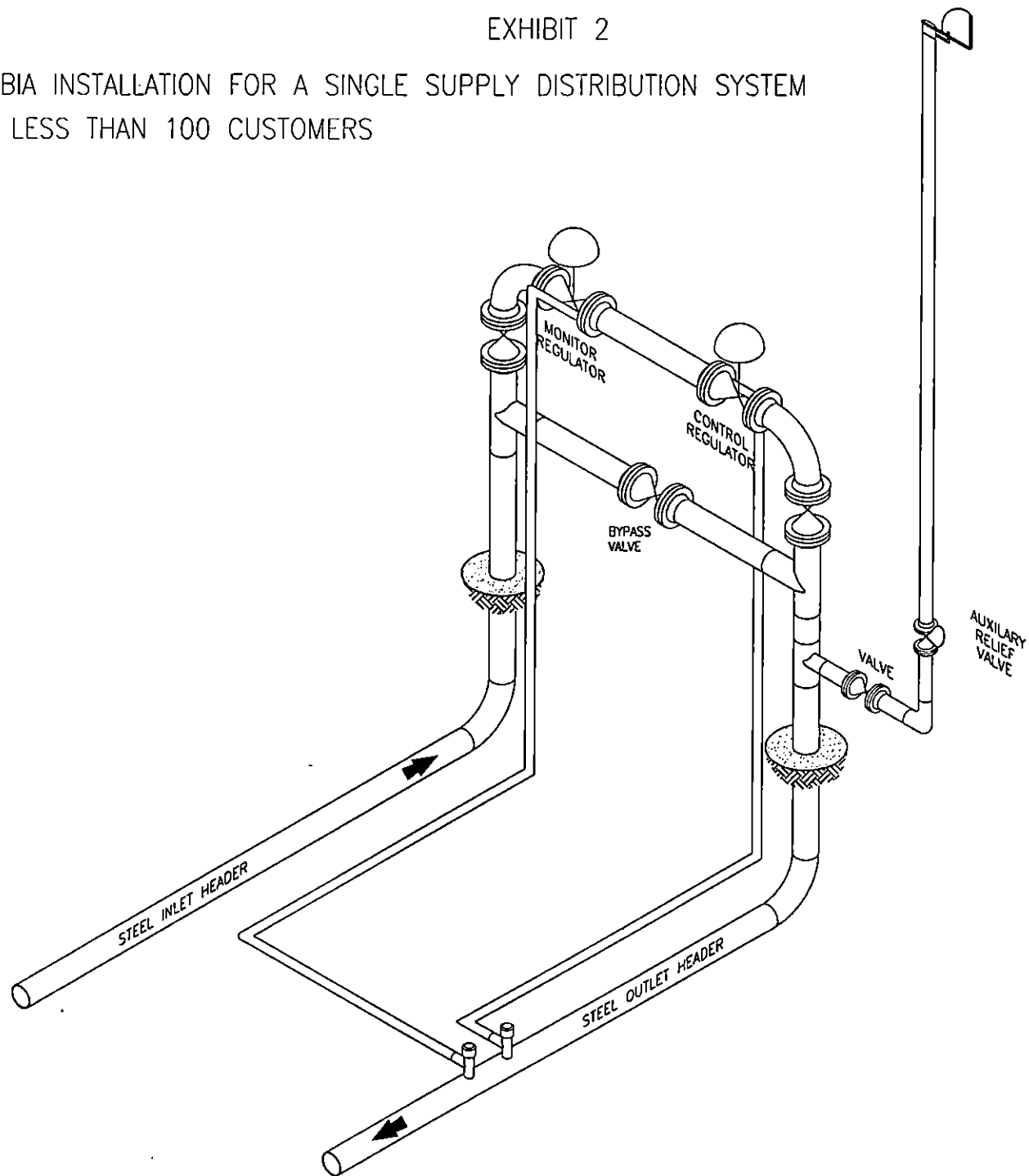
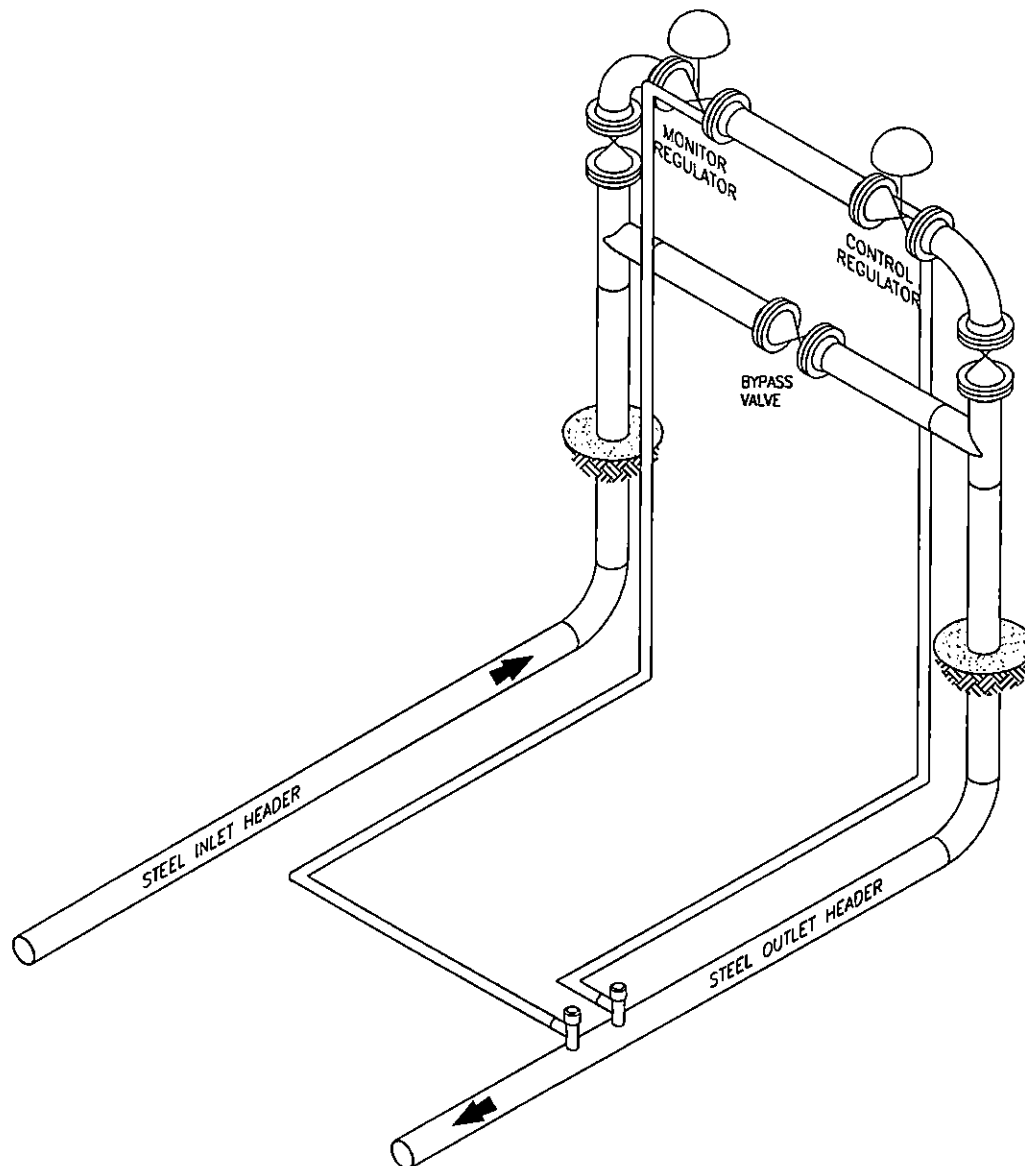


EXHIBIT 3

TYPICAL COLUMBIA INSTALLATION FOR A SINGLE SUPPLY DISTRIBUTION SYSTEM
THAT SUPPLIES MORE THAN 100 CUSTOMERS



KY PSC Case No. 2015-00084
Staff's Informal Conference Request No. 2
Respondent: Gary Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
DATED MARCH 17, 2016**

2. Provide an update of the spreadsheet that was attached to Columbia's response to Commission Staff's Initial Request for Information ("Staff's Initial Request"), Item 5. This update should indicate which customers it considers to be high volume customers.

Response:

The updated spreadsheet is attached and a column has been added to include the measuring station numbers of our large volume customers.

Station Number	System Number	Number Customers	Pipe Length (ft)	Pipe Size (in)	System Name	MAOP	Normal Operating Pressure	Premise ID	Station Location	Large Volume Customers
1018	32010191	103	20,018	4		LP	10.5" w.c.	0200120		
1026	32010193	217	14,488	2,3,4,6,8		LP	10.5" w.c.	0200137		
1027	32010134	148	10,170	2,3,4,6		40	35 psig	0200125		
1029	32010130	45	6,120	2,3,4		60	47 psig	0200095		804625, 848642
1031	32010194	397	19,251	3,4,6,8,10,12		LP	10.5" w.c.	0200139		805147
1052	32010096	139	16,787	2,3,4,6		60	50 psig	0200469		
1061	32010040	202	10,579	2,3,4,6		8	7 psig	0200084		
1061	32010028	26	11,780	2,3,4,6		60	42 psig	0200084		845244
1066	32010133	279	29,445	2,3,4,6		35	30 psig	0200109		804726, 804422, 849006
1067	32010099	164	19,292	2,3,4		8	7 psig	0200062		
1068	32010122	15	4,989	2,4,6		40	25 psig	0200107		804217, 803739, 805709, 848988
1072	32010135	45	7,429	2,4,6		35	30 psig	0200086		
1094	32010101	2346	127,658	2,3,4,6,8		40	32 psig	0209577		
1097	32010086	51	7,508	2,4,6		9	6 psig	0200071		
1100	32010038	337	39,932	2,3,4,6		14	10 psig	0200129		
1112	32010091	34	5,466	2,3,4,6,8		8	7 psig	0200478		
1113	32010108	131	22,644	2,3,4,6		10	8 psig	0200360		
1115	32010107	44	14,070	2,3		8	5 psig	0200362		
1118	32010109	14	3,144	6		10	8 psig	0200074		
1119	32010127	214	16,151	2,3,4,6,8		10	8 psig	0200073		805906
1122	32010085	42	5,590	2,3,4		7	5.5 psig	0200467		
1129	32010042	5	2,523	2,3		8	6 psig	0200369		
1135	32046001	118	42,344	2,3,4		20	17 psig	0200078		
1136	32010079	6	4,457	2,3,4		14	8 psig	0200374		
1142	32010092	161	13,032	2,3,4		60	35 psig	0200378		814058
1145	32010034	27	15,306	2,3,4		60	25 psig	0200380		
1146	32057001	9	1,375	2		60	11 psig	0200381		
1147	32010076	9	669	2		60	8.5 psig	0200382		
1149	32010037	272	18,883	2,3,4		60	20 psig	0200384		
1151	32010185	2	15	4		100	95 psig	0200470		814454
1154	32010083	72	16,335	2,3,4		8	6 psig	0200387		
1157	32010115	8	3,107	2,3		10	8 psig	0200390		
1159	32010093	31	996	4		LP	10" w.c.	0200392		
1163	32010140	1	5000 (aprox)	unk		10	9 psig	0200395		
1164	32010104	32	5,691	2,3,4		LP	10.5" w.c.	0200396		
1165	32010103	17	705	4		LP	10" w.c.	0200397		
1170	32010117	21	4,491	2,3		10	7.5 psig	0200458		
1171	32010095	12	3,455	2,3,4		6	5 psig	0200868		
1172	32010189	12	2,757	4,6		LP	10" w.c.	0200459		
1173	32010074	4	4,972	2,3,4,6,8		LP	10.5" w.c.	0200460		
1176	32010126	142	19,445	2,3,4		60	30 psig	0200476		
1177	32010128	331	21,441	2,3,4,6		60	30 psig	0200879		
1180	32010053	54	8,652	2,3		9	8 psig	0200874		
1181	32010119	14	2,610	2,3		60	10 psig	0200477		
1182	32010139	2	817	2,3		60	40 psig	0200876		
1183	32010136	7	2,190	2		60	10 psig	0200889		
1186	32047001	50	12,748	2,3,4		10	6 psig	0206235		
1187	32010113	23	9,642	2,3		10	8 psig	0206232		
1195	32068001	7	3,771	1,2		15	11 psig	0200972		
1199	32010098	26	5,998	2,3,4		20	15 psig	0206520		
1203	32010144	30	10,499	2,4		60	30 psig	0208722		
1204	32010080	36	4,407	2,3,4		60	22 psig	0208562		
1209	32010090	90	27,490	2,3,4,6,10		60	50 psig	0210214		

Station Number	System Number	Number Customers	Pipe Length (ft)	Pipe Size (in)	System Name	MAOP	Normal Operating Pressure	Premise ID	Station Location	Large Volume Customers
1210	32010082	5	1,058	2		60	15 psig	0210286		
1211	32010123	1	384	8		60	40 psig	0210709		
1215	32010051	1334	84,930	2,3,4,6		60	48 psig	0211762		846769
1217	32010192	6	1,800	2		15	10 psig	0212245		805529, 845927
1230	32010165	89	5,406	2,3,4		5	4 psig	0200191		
1230	32010166	122	11,417	2,3,4,6,8		LP	10" w.c.	0200191		
1237	32050001	6	2,410	2		10	7 psig	0200952		
1240	32010180	9	2,754	2		60	40 psig	0209287		
1251	32010176	926	93,386	1.25,2,2.5,3,4,6		20	17.5 psig	0200293		805295
1273	32047003	67	8,866	2,4,6		5	4 psig	0200310		
1276	32010188	6	28,747	6		99	73 psig	0200405		849278
1277	32010172	95	12,415	2,4		10	7 psig	0200335		
1278	32010174	58	5,873	1.25,2		10	7 psig	0200721		
1279	32010175	55	6,905	1.25,1.5,2,2.5		10	7 psig	0201008		
1280	32010179	93	5,257	2		60	28 psig	0201007		
1282	32064001	50	5,216	2,6		60	25 psig	0200921		
1285	32010182	10	8,003	2,4,6		60	50 psig	0211320		
1352	32051029	1	500 (approx)	unk		60	12 psig	0200015		
1366	32033001	5	3,614	2		10	5 psig	0200409		
1367	32023001	7	3,375	1.25,2		10	5 psig	0200410		
1375	32051008	19	52,155	2,10,12,16		60	30 psig	0209741		
1377	32051021	12	4,717	2		60	25 psig	0209818		
1379	32051025	15	10,436	2,4		60	40 psig	0210406		
1405	32005003	12	2,940	2,3,4		10	7.5 psig	0200811		
1406	32006001	4	525	2		16	7.5 psig	0200411		
1413	32039001	40	4,677	2,3,4,6,8		60	10 psig	0200207		
1425	32012003	142	34,303	2,3,4		42	30 psig	0200229		
1430	32034001	1	841	2		10	8 psig	0200421		
1434	32054001	27	25,352	2,3		60	25 psig	0200792		805682
1435	32053001	11	803	2		10	6 psig	0200892		
1439	32066002	9	440	2		60	20 psig	0210154		
1440	32017001	34	5,063	2,3,4		10	8 psig	0210363		
1441	32029001	55	8,070	2,3		10	7 psig	0210362		
1442	32056001	43	6,476	2,3,4		10	7 psig	0210230		
1462	32048007	5	3,536	2,4		8	6 psig	0200425		
1488	32065001	7	3,718	2		60	3 psig	0210247		
1523	32010067	88	5,423	2,4,8		15	12 psig	0200272		
1526	32010058	303	33,350	2,3,4,6		14	12 psig	0200143		
1529	32010064	35	8,353	2,3,6		20	14.5 psig	0200163		
1533	32010072	152	23,415	2,3,4,6		20	15 psig	0200144		
1536	32010068	115	14,173	2,4		12	7 psig	0200145		
1538	32010071	64	19,403	2,3,4,6		58	45 psig	0200445		804946, 844119, 845229, 848431
1539	32010069	19	6,798	2,3		24	18 psig	0200621		
1542	32010161	2	1,608	2		60	40 psig	0201005		
1543	32010070	110	35,356	2,3,4,6		60	50 psig	0201012		848556
1544	32010055	3	1000 (approx)	unk		15	10.5 psig	0201013		
1545	32010153	233	11,449	2,3		60	18 psig	0206664		
1547	32010063	33	2,681	2		10	8 psig	0200955		
1556	32010046	776	62,642	2,3,4		10	8 psig	0200238		
1564	32010154	784	51,235	2,4,6		30	25 psig	0200654		
1565	32010155	5	3,904	2,3,4		60	50 psig	0206610		
1568	32010156	495	50,302	2,4		60	30 psig	0200963		
1569	32010164	19	7,285	2,3,4		60	30 psig	0206597		

Station Number	System Number	Number Customers	Pipe Length (ft)	Pipe Size (in)	System Name	MAOP	Normal Operating Pressure	Premise ID	Station Location	Large Volume Customers
1570	32010159	23	14,872	2, 4, 6		60	40 psig	0206598		
1585	32010005	80	7,272	2, 3, 4		5	4.5 psig	0200247		805913
1586	32010007	107	7,518	2, 3, 4, 6, 8		7	6 psig	0200241		
1587	32010009	179	11,444	2, 3, 4, 6		8	5 psig	0200242		
1590	32010006	8	1,023	3		10	8 psig	0200877		
1591	32010152	34	3,211	2		60	10 psig	0200724		
1594	32010148	14	4,269	2		60	10 psig	0206606		
1595	32010147	88	11,599	2, 3		60	10 psig	0206607		
1597	32010162	6	3,209	2		60	25 psig	0206608		
1599	32010163	237	11,392	2, 3		60	25 psig	0208608		
1617	32010021	32	10,595	2, 4		18	10 psig	0200454		
1633	32010025	27	9,561	2		60	12 psig	0200740		
1635	32010039	32	10,302	2		60	12 psig	0206557		
1636	32010022	47	10,595	2, 4		10	6 psig	0208335		
1638	32055001	92	36,866	2, 3, 4, 6		60	50 psig	0210841		814673, 844014, 845843, 847691, 84862
1640	32010017	248	25,800	2, 3, 4, 6		7	5 psig	0211082		804667
1664	32049003	94	15,096	2, 3, 4, 6		20	15 psig	0200689		
1669	32049004	9	2,310	2		20	12 psig	0200691		
1670	32049005	151	24,223	2, 4		60	23 psig	0200956		
1671	32049009	2	400	2		8	5 psig	0200888		
1672	32049002	48	7,016	2		8	5 psig	0206403		
1673	32049001	87	18,013	2, 3		37	12 psig	0208560		
1674	32049010	3	338	2		60	10 psig	0208564		
1684	32001013	10	595	4		16	11 psig	0200706		
1687	32001015	24	2,347	2, 4		6	5 psig	0200705		
1688	32001006	125	20,218	2, 4		18	12 psig	0200708		
1690	32001021	81	25,816	2		36	30 psig	0200709		
1691	32001017	17	1,736	2		12	8 psig	0200710		
1692	32001008	54	6,109	2, 3, 4		15	12 psig	0200219		
1693	32001024	18	2,147	4		LP	10" w.c.	0200711		
1694	32001019	4	275	2		10	6 psig	0206455		
1695	32001007	2	3,588	2, 3, 4		LP	10" w.c.	0200900		
1696	32001005	5	1,224	2, 3		60	35 psig	0209721		
1851	32010059	289	25,583	2, 4, 6		60	20 psig	0208498		
1853	32010150	13	1,474	3		60	18 psig	0209339		
1856	32010183	4	2,357	2		60	12 psig	0210886		
1857	32010184	4	765	2		60	14 psig	0210907		
1858	32010186	453	27,120	1, 2, 3, 4, 6, 8		60	45 psig	0211194		
1859	32010045	26	7,518	2, 3, 4		5	3 psig	0211292		
817715	32007001	5	1,045	2		8	7.5 psig	0212035		
		6	4,500	unk		15	15 psig	0212247		
805544	32019001	163	43,042	1, 2, 3		41	25 psig	0212045		
817712	32044001	122	13,210	2, 3, 4		11	7.5 psig	0212036		
817714	32041001	20	9,492	1, 2, 4		8	6 psig	0212024		
817716	32040001	42	4,571	2, 4		8	5.5 psig	0212031		
817717	32011001	38	14,053	2, 3, 4		50	35 psig	0212032		814480
817718	32043001	77	10,764	2, 3, 4		9	8 psig	0212035		
817719	32045001	39	5,289	2, 3		10	9 psig	0212048		
817720	32042001	90	9,492	1, 2, 4		50	8.5 psig	0212039		
817721	32038001	75	27,466	1, 2, 3, 4		60	35 psig	0212046		
817724	32018001	59	11,083	2, 3, 4		10	8 psig	0212246		

KY PSC Case No. 2015-00084
Staff's Informal Conference Request No. 3
Respondent: Gary Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
DATED MARCH 17, 2016**

3. Confirm whether any of Columbia's distribution systems being supplied by one district pressure regulating station, that have recording pressure gauges and are not included in Columbia's deviation request. If so, state the number of these distribution systems and describe how they differ from those in Columbia's deviation request.

Response:

There are 48 distribution systems that are supplied by one district pressure regulating station that do have recording pressure gauges that are not included in Columbia's deviation request. Columbia does not retain interim design information to reconstruct the reasons a recording pressure gauge was installed.

KY PSC Case No. 2015-00084
Staff's Informal Conference Request No. 4
Respondent: Gary Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
DATED MARCH 17, 2016**

4. Confirm the number of customers who have Gas Measurement Billing and whether any of these customers are on distribution systems included in Columbia's deviation request

Response:

Columbia has 152 customers with Gas Measurement Billing. Yes there are 19 distribution systems that supply one or more Gas Measurement Billing customers where Columbia is requesting a deviation.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
DATED MARCH 17, 2016**

5. Refer to Columbia's response to Staff's Initial Request, Item 4.

a) Provide the current number of gauges that Columbia has in use that it describes as one of the following:

- (i) Chart recording gauge (paper).
- (ii) Electronic recording gauge;
- (iii) Chart recording gauge at customer facilities; and,
- (iv) End of line gauge.

b) Describe any overlap among the above gauges. (i.e. are there multiple gauges at the same location)? If so, describe the number and type of gauges that overlap.

c) State Columbia's reason for installing each of the above gauges.

d) State the location of each of the above gauges.

Response:

a) Columbia has 163 chart recording gauges in use at district stations, 124 electronic recording gauges, 30 paper chart recording gauges at customer facilities, and 3 end of line gauges.

- b) There is no overlap among these gauges at a single location. There is sometimes more than one instrument at a location if there are multiple systems supplied by that location. Columbia does not consider such an occurrence an overlapping gauge since each gauge would be monitoring different pressures.
- c. Columbia installs pressure recording instruments to comply with 49 C.F.R. Part 192.741 (a). Columbia also installs instruments to measure the pressure used for correcting meter volumes, at suspected low pressure areas, at high volume stations, to diagnose pressure control problems, and to validate hydraulic modeling.
- d) The location of each instrument is indicated in the attachment.

TCC	Facility Number	Taxing District	Facility Type	Premise	Location	Comments
2631 - ASHLAND	0000000012	0193602	Chart Recording Gauge	0200004		District Station
2631 - ASHLAND	0000000020	0193602	Chart Recording Gauge	0200005		District Station
2631 - ASHLAND	0000000033	0193608	Chart Recording Gauge	0200007		District Station
2631 - ASHLAND	0000000052	0193608	Chart Recording Gauge	0200009		District Station
2631 - ASHLAND	0000000061	0193608	Chart Recording Gauge	0200010		District Station
2631 - ASHLAND	0000000079	0193612	Chart Recording Gauge	0200012		District Station
2631 - ASHLAND	0000000105	0193612	Chart Recording Gauge	0200015		District Station
2631 - ASHLAND	0000000133	0193612	Chart Recording Gauge	0200018		District Station
2631 - ASHLAND	0000000180	0193612	Chart Recording Gauge	0200025		District Station
2631 - ASHLAND	0000000189	0193612	Chart Recording Gauge	0200026		District Station
2631 - ASHLAND	0000000197	0193612	Chart Recording Gauge	0200027		District Station
2631 - ASHLAND	0000000216	0193612	Chart Recording Gauge	0200029		District Station
2631 - ASHLAND	0000000251	0193612	Chart Recording Gauge	0200033		District Station
2631 - ASHLAND	0000000279	0193613	Chart Recording Gauge	0200037		District Station
2631 - ASHLAND	0000000288	0193613	Chart Recording Gauge	0200038		District Station
2631 - ASHLAND	0000000297	0193613	Chart Recording Gauge	0200039		District Station
2631 - ASHLAND	0000000306	0193613	Chart Recording Gauge	0200040		District Station
2621 - LEXINGTON	0000000733	0674805	Chart Recording Gauge	0200090		District Station
2621 - LEXINGTON	0000000782	0674805	Chart Recording Gauge	0200096		District Station
2621 - LEXINGTON	0000000986	0674805	Chart Recording Gauge	0200116		District Station
2631 - ASHLAND	0000001553	0895112	Chart Recording Gauge	0200178		District Station
2631 - ASHLAND	0000001562	0895112	Chart Recording Gauge	0200179		District Station
2631 - ASHLAND	0000001581	0895117	Chart Recording Gauge	0200181		District Station
2631 - ASHLAND	0000001582	0895117	Chart Recording Gauge	0200181		District Station
2631 - ASHLAND	0000001597	0895117	Chart Recording Gauge	0200182		District Station
2631 - ASHLAND	0000001645	0895125	Chart Recording Gauge	0200187		District Station
2631 - ASHLAND	0000001646	0895125	Chart Recording Gauge	0200187		District Station
2633 - LANCER	0000001711	1195702	Chart Recording Gauge	0200198		District Station
2631 - ASHLAND	0000001720	1276010	Chart Recording Gauge	0200200		District Station
2631 - ASHLAND	0000001729	1276010	Chart Recording Gauge	0200201		District Station
2633 - LANCER	0000001742	1596602	Chart Recording Gauge	0200205		District Station
2633 - LANCER	0000001743	1596602	Chart Recording Gauge	0200205		District Station
2632 - MAYSVILLE	0000001807	1616705	Chart Recording Gauge	0200212		District Station
2633 - LANCER	0000001936	1957702	Chart Recording Gauge	0200229		District Station
2623 - FRANKFORT	0000002060	2398305	Chart Recording Gauge	0200243		District Station
2623 - FRANKFORT	0000002099	2398302	Chart Recording Gauge	0200246		District Station
2621 - LEXINGTON	0000002151	0674805	Chart Recording Gauge	0200139		District Station

2621 - LEXINGTON	0000002203	0674805	Chart Recording Gauge	0200266	District Station
2621 - LEXINGTON	0000002204	0674805	Chart Recording Gauge	0200266	District Station
2631 - ASHLAND	0000002221	0895120	Chart Recording Gauge	0200268	District Station
2629 - WINCHESTER	0000002382	0173715	Chart Recording Gauge	0200293	District Station
2631 - ASHLAND	0000002464	0895112	Chart Recording Gauge	0200311	District Station
2631 - ASHLAND	0000002488	0895124	Chart Recording Gauge	0200314	District Station
2631 - ASHLAND	0000002489	0895124	Chart Recording Gauge	0200314	District Station
2631 - ASHLAND	0000002524	0895102	Chart Recording Gauge	0200316	District Station
2631 - ASHLAND	0000002554	0895102	Chart Recording Gauge	0200318	District Station
2631 - ASHLAND	0000002598	1276010	Chart Recording Gauge	0200323	District Station
2631 - ASHLAND	0000002599	1276010	Chart Recording Gauge	0200323	District Station
2631 - ASHLAND	0000002612	1276002	Chart Recording Gauge	0200324	District Station
2629 - WINCHESTER	0000002646	0654603	Chart Recording Gauge	0200327	District Station
2633 - LANCER	0000002685	1957702	Chart Recording Gauge	0200336	District Station
2629 - WINCHESTER	0000003094	0173710	Chart Recording Gauge	0200405	District Station
2633 - LANCER	0000003141	0714902	Chart Recording Gauge	0200414	District Station
2632 - MAYSVILLE	0000003235	1616702	Chart Recording Gauge	0200432	District Station
2632 - MAYSVILLE	0000003258	1616702	Chart Recording Gauge	0200435	District Station
2623 - FRANKFORT	0000003319	2398305	Chart Recording Gauge	0200446	District Station
2621 - LEXINGTON	0000003453	0674805	Chart Recording Gauge	0200466	District Station
2621 - LEXINGTON	0000003468	0674805	Chart Recording Gauge	0200468	District Station
2621 - LEXINGTON	0000003469	0674805	Chart Recording Gauge	0200468	District Station
2621 - LEXINGTON	0000003637	0674805	Chart Recording Gauge	0200503	Customer Facilities
2621 - LEXINGTON	0000004184	0674805	Chart Recording Gauge	0200571	Customer Facilities
2621 - LEXINGTON	0000004262	0674805	Chart Recording Gauge	0200576	Customer Facilities
2621 - LEXINGTON	0000004580	0674802	Chart Recording Gauge	0200613	Customer Facilities
2623 - FRANKFORT	0000004607	0735005	Chart Recording Gauge	0200627	Customer Facilities
2623 - FRANKFORT	0000004758	0735005	Chart Recording Gauge	0200647	Customer Facilities
2629 - WINCHESTER	0000005040	0975302	Chart Recording Gauge	0200678	Customer Facilities
2629 - WINCHESTER	0000005041	0975302	Chart Recording Gauge	0200678	Customer Facilities
2629 - WINCHESTER	0000005071	0975305	Chart Recording Gauge	0200681	Customer Facilities
2629 - WINCHESTER	0000005191	1736902	Chart Recording Gauge	0200700	Customer Facilities
2629 - WINCHESTER	0000005311	0173710	Chart Recording Gauge	0200716	Customer Facilities
2633 - LANCER	0000005828	1155502	Chart Recording Gauge	0200803	Customer Facilities
2633 - LANCER	0000005842	1195705	Chart Recording Gauge	0200804	Customer Facilities
2633 - LANCER	0000005856	1195702	Chart Recording Gauge	0200807	Customer Facilities
2631 - ASHLAND	0000005892	1276002	Chart Recording Gauge	0200811	District Station
2631 - ASHLAND	0000005906	0193612	Chart Recording Gauge	0200813	District Station

2631 - ASHLAND	0000005949	0193612	Chart Recording Gauge	0200834		Customer Facilities
2631 - ASHLAND	0000005986	0895102	Chart Recording Gauge	0200838		Customer Facilities
2631 - ASHLAND	0000006025	0895102	Chart Recording Gauge	0200842		Customer Facilities
2631 - ASHLAND	0000006105	0193602	Chart Recording Gauge	0200851		Customer Facilities
2632 - MAYSVILLE	0000006364	1616705	Chart Recording Gauge	0200920		District Station
2623 - FRANKFORT	0000083276	2398302	Electronic Recording Gauge	0200246		District Station
2631 - ASHLAND	0000110168	0193602	Chart Recording Gauge	0206035		District Station
2631 - ASHLAND	0000111570	0193602	Chart Recording Gauge	0200322		District Station
2631 - ASHLAND	0000111600	0193602	Chart Recording Gauge	0200322		District Station
2631 - ASHLAND	0000122943	0895114	Chart Recording Gauge	0200312		District Station
2631 - ASHLAND	0000123053	0895114	Chart Recording Gauge	0200313		District Station
2631 - ASHLAND	0000124150	0895125	Chart Recording Gauge	0200188		District Station
2621 - LEXINGTON	0000124214	0674805	Chart Recording Gauge	0200511		Customer Facilities
2631 - ASHLAND	0000127265	1276002	Chart Recording Gauge	0200420		District Station
2631 - ASHLAND	0000138224	0895129	Chart Recording Gauge	0206119		Customer Facilities
2631 - ASHLAND	0000138484	0895108	Chart Recording Gauge	0200853		Customer Facilities
2621 - LEXINGTON	0000166126	0674805	Chart Recording Gauge	0200106		District Station
2621 - LEXINGTON	0000166131	0674805	Chart Recording Gauge	0200126		District Station
2621 - LEXINGTON	0000169334	0674805	Chart Recording Gauge	0200264		District Station
2623 - FRANKFORT	0000175863	2398305	Chart Recording Gauge	0200729		Customer Facilities
2623 - FRANKFORT	0000175908	2398310	Chart Recording Gauge	0200728		Customer Facilities
2621 - LEXINGTON	0000177817	0674805	Chart Recording Gauge	0200949		Customer Facilities
2629 - WINCHESTER	0000178737	0494302	Chart Recording Gauge	0200758		Customer Facilities
2629 - WINCHESTER	0000178802	0494305	Chart Recording Gauge	0206458		Customer Facilities
2621 - LEXINGTON	0000180219	0674805	Chart Recording Gauge	0200064		District Station
2621 - LEXINGTON	0000180239	0674805	Chart Recording Gauge	0200111		District Station
2621 - LEXINGTON	0000184435	0674805	Chart Recording Gauge	0209030		District Station
2623 - FRANKFORT	0000190548	2398310	Chart Recording Gauge	0200249		District Station
2621 - LEXINGTON	0000194471	0674805	Chart Recording Gauge	0200080		District Station
2621 - LEXINGTON	0000238266	0674805	Chart Recording Gauge	0208440		Customer Facilities
2631 - ASHLAND	0000238536	0193612	Chart Recording Gauge	0208447		Customer Facilities
2621 - LEXINGTON	0000240057	0674805	Chart Recording Gauge	0200117		District Station
2631 - ASHLAND	0000241305	0895125	Chart Recording Gauge	0200177		District Station
2631 - ASHLAND	0000241311	0895117	Chart Recording Gauge	0200319		District Station
2631 - ASHLAND	0000241317	0895117	Chart Recording Gauge	0200180		District Station
2631 - ASHLAND	0000241324	0193612	Chart Recording Gauge	0200024		District Station
2621 - LEXINGTON	0000241464	0674805	Chart Recording Gauge	0200111		District Station
2631 - ASHLAND	0000242175	0895123	Chart Recording Gauge	0200186		District Station

2631 - ASHLAND	0000242179	0895122	Chart Recording Gauge	0200185		District Station
2631 - ASHLAND	0000242180	0193612	Chart Recording Gauge	0200031		District Station
2631 - ASHLAND	0000242187	0193612	Chart Recording Gauge	0200013		District Station
2631 - ASHLAND	0000242192	0193612	Chart Recording Gauge	0200021		District Station
2631 - ASHLAND	0000242194	0193608	Chart Recording Gauge	0200269		District Station
2631 - ASHLAND	0000242195	0193608	Chart Recording Gauge	0200008		District Station
2631 - ASHLAND	0000242196	0895122	Chart Recording Gauge	0200174		District Station
2631 - ASHLAND	0000242198	0193610	Chart Recording Gauge	0200011		District Station
2631 - ASHLAND	0000242201	0895117	Chart Recording Gauge	0200320		District Station
2633 - LANCER	0000242705	1957702	Chart Recording Gauge	0208590		Customer Facilities
2631 - ASHLAND	0000243260	0193602	Chart Recording Gauge	0208602		Customer Facilities
2623 - FRANKFORT	0000243825	0735002	Chart Recording Gauge			End of Line Gauge
2632 - MAYSVILLE	0000244167	1616705	Chart Recording Gauge	0200427		District Station
2632 - MAYSVILLE	0000244168	1616705	Chart Recording Gauge	0200773		District Station
2632 - MAYSVILLE	0000244171	1616705	Chart Recording Gauge	0200436		District Station
2633 - LANCER	0000244378	1155502	Chart Recording Gauge	0208494		District Station
2631 - ASHLAND	0000247590	0193612	Chart Recording Gauge	0200023		District Station
2632 - MAYSVILLE	0000254562	1616705	Chart Recording Gauge	0200866		District Station
2631 - ASHLAND	0000254755	0193612	Chart Recording Gauge	0200028		District Station
2631 - ASHLAND	0000254762	0193612	Chart Recording Gauge	0200016		District Station
2631 - ASHLAND	0000254778	0193612	Chart Recording Gauge	0200014		District Station
2631 - ASHLAND	0000254780	0193612	Chart Recording Gauge	0200030		District Station
2631 - ASHLAND	0000254789	0193612	Chart Recording Gauge	0200020		District Station
2621 - LEXINGTON	0000259712	0674805	Electronic Recording Gauge	0200516		Customer Facilities
2621 - LEXINGTON	0000259713	0674805	Electronic Recording Gauge	0200563		Customer Facilities
2633 - LANCER	0000264844	1596611	Chart Recording Gauge	0200209		District Station
2631 - ASHLAND	0000265745	0193613	Chart Recording Gauge	0200036		District Station
2621 - LEXINGTON	0000269314	0674805	Chart Recording Gauge	0200913		District Station
2621 - LEXINGTON	0000269375	0674805	Chart Recording Gauge	0200112		District Station
2621 - LEXINGTON	0000269390	0674805	Chart Recording Gauge	0200088		District Station
2621 - LEXINGTON	0000269402	0674805	Chart Recording Gauge	0200922		District Station
2621 - LEXINGTON	0000269871	0674805	Chart Recording Gauge	0206233		District Station
2621 - LEXINGTON	0000274382	0674805	Chart Recording Gauge	0200138		District Station
2623 - FRANKFORT	0000275812	2098005	Chart Recording Gauge	0200240		District Station
2621 - LEXINGTON	0000277466	0674805	Chart Recording Gauge	0200368		District Station
2621 - LEXINGTON	0000277468	0674805	Chart Recording Gauge	0200082		District Station
2621 - LEXINGTON	0000280194	0674805	Chart Recording Gauge	0200080		District Station
2621 - LEXINGTON	0000280330	0674805	Chart Recording Gauge	0200473		District Station

2621 - LEXINGTON	0000280333	0674805	Chart Recording Gauge	0200473		District Station
2632 - MAYSVILLE	0000280397	1616702	Chart Recording Gauge	0208891		District Station
2621 - LEXINGTON	0000283285	0674805	Chart Recording Gauge	0200081		District Station
2621 - LEXINGTON	0000283286	0674805	Chart Recording Gauge	0200090		District Station
2621 - LEXINGTON	0000283288	0674805	Chart Recording Gauge	0200067		District Station
2621 - LEXINGTON	0000283289	0674805	Chart Recording Gauge	0200128		District Station
2621 - LEXINGTON	0000283290	0674805	Chart Recording Gauge	0200469		District Station
2631 - ASHLAND	0000284218	0895125	Electronic Recording Gauge	0200844		Customer Facilities
2623 - FRANKFORT	0000284434	2398310	Electronic Recording Gauge	0200732		Customer Facilities
2621 - LEXINGTON	0000285702	0674805	Chart Recording Gauge	0200087		District Station
2629 - WINCHESTER	0000286352	0975305	Electronic Recording Gauge	0206589		District Station
2621 - LEXINGTON	0000287479	0674805	Chart Recording Gauge	0200064		District Station
2631 - ASHLAND	0000287579	0193612	Chart Recording Gauge	0200032		District Station
2633 - LANCER	0000287885	1596611	Chart Recording Gauge	0200325		District Station
2631 - ASHLAND	0000288685	0895122	Chart Recording Gauge	0200184		District Station
2623 - FRANKFORT	0000288872	2398310	Chart Recording Gauge	0200250		District Station
2632 - MAYSVILLE	0000290717	1616703	Electronic Recording Gauge	0200780		Customer Facilities
2629 - WINCHESTER	0000294796	0494305	Chart Recording Gauge	0200050		District Station
2629 - WINCHESTER	0000294798	1736906	Chart Recording Gauge	0200715		District Station
2621 - LEXINGTON	0000297039	0674805	Electronic Recording Gauge	0200508		Customer Facilities
2629 - WINCHESTER	0000297957	0975305	Chart Recording Gauge	0200194		District Station
2632 - MAYSVILLE	0000300251	1616702	Chart Recording Gauge	0208925		District Station
2623 - FRANKFORT	0000301523	0735007	Electronic Recording Gauge	0206670		District Station
2621 - LEXINGTON	0000301527	0674805	Electronic Recording Gauge	0200871		District Station
2629 - WINCHESTER	0000301532	1736902	Electronic Recording Gauge	0200218		District Station
2629 - WINCHESTER	0000303529	0494305	Electronic Recording Gauge	0200451		District Station
2629 - WINCHESTER	0000303534	1736906	Electronic Recording Gauge	0200279		District Station
2631 - ASHLAND	0000304797	0193612	Electronic Recording Gauge	0208671		Customer Facilities
2623 - FRANKFORT	0000309816	2398302	Electronic Recording Gauge	0206605		District Station
2621 - LEXINGTON	0000315136	0674805	Electronic Recording Gauge	0200546		Customer Facilities
2621 - LEXINGTON	0000315321	0674805	Chart Recording Gauge	0209343		District Station
2621 - LEXINGTON	0000315322	0674805	Chart Recording Gauge	0209343		District Station
2632 - MAYSVILLE	0000316918	1616705	Chart Recording Gauge	0200215		District Station
2623 - FRANKFORT	0000332923	0735002	Chart Recording Gauge			End of Line Gauge
2632 - MAYSVILLE	0000333419	1616705	Chart Recording Gauge	0210018		District Station
2623 - FRANKFORT	0000333911	0735007	Chart Recording Gauge			End of Line Gauge
2629 - WINCHESTER	0000335933	1736902	Electronic Recording Gauge	0200704		Customer Facilities
2632 - MAYSVILLE	0000336946	1616705	Chart Recording Gauge	0200216		District Station

2631 - ASHLAND	0000340833	0895117	Electronic Recording Gauge	0200181		District Station
2631 - ASHLAND	0000340840	0193613	Electronic Recording Gauge	0200037		District Station
2631 - ASHLAND	0000340844	0193602	Electronic Recording Gauge	0209010		District Station
2631 - ASHLAND	0000340849	0895125	Electronic Recording Gauge	0200187		District Station
2623 - FRANKFORT	0000342230	0735005	Chart Recording Gauge	0200273		District Station
2632 - MAYSVILLE	0000344891	1616705	Chart Recording Gauge	0210199		District Station
2623 - FRANKFORT	0000345961	0735007	Electronic Recording Gauge	0210227		Customer Facilities
2621 - LEXINGTON	0000347992	0674805	Electronic Recording Gauge	0200462		Customer Facilities
2621 - LEXINGTON	0000348482	0674805	Electronic Recording Gauge	0200080		District Station
2621 - LEXINGTON	0000348484	0674805	Electronic Recording Gauge	0209030		District Station
2621 - LEXINGTON	0000348489	0674805	Electronic Recording Gauge	0206233		District Station
2621 - LEXINGTON	0000348712	0674805	Chart Recording Gauge	0200345		District Station
2631 - ASHLAND	0000355559	0193613	Electronic Recording Gauge	0210336		Customer Facilities
2623 - FRANKFORT	0000355631	0735005	Chart Recording Gauge	0200442		District Station
2633 - LANCER	0000355868	1957702	Chart Recording Gauge	0200336		District Station
2629 - WINCHESTER	0000356052	0173702	Electronic Recording Gauge	0200933		District Station
2621 - LEXINGTON	0000357050	0674805	Electronic Recording Gauge	0200264		District Station
2621 - LEXINGTON	0000358451	0674805	Electronic Recording Gauge	0200574		Customer Facilities
2623 - FRANKFORT	0000359132	2098005	Electronic Recording Gauge	0200658		Customer Facilities
2621 - LEXINGTON	0000360346	0674805	Electronic Recording Gauge	0200520		Customer Facilities
2621 - LEXINGTON	0000361823	0674805	Electronic Recording Gauge	0200555		Customer Facilities
2629 - WINCHESTER	0000364973	0494305	Electronic Recording Gauge	0201011		Customer Facilities
2629 - WINCHESTER	0000370689	0654603	Chart Recording Gauge	0200057		District Station
2621 - LEXINGTON	0000371008	0674805	Electronic Recording Gauge	0200505		Customer Facilities
2629 - WINCHESTER	0000374812	0173715	Chart Recording Gauge	0200293		District Station
2623 - FRANKFORT	0000379788	0735005	Chart Recording Gauge	0200160		District Station
2621 - LEXINGTON	0000379880	0674805	Electronic Recording Gauge	0200501		Customer Facilities
2623 - FRANKFORT	0000379881	0735002	Electronic Recording Gauge	0210340		Customer Facilities
2629 - WINCHESTER	0000385670	0173710	Electronic Recording Gauge	0200720		Customer Facilities
2633 - LANCER	0000388461	0714902	Chart Recording Gauge	0200263		District Station
2633 - LANCER	0000388462	1596602	Chart Recording Gauge	0200206		District Station
2633 - LANCER	0000388463	1596610	Chart Recording Gauge	0200207		District Station
2633 - LANCER	0000388465	0714902	Chart Recording Gauge	0200141		District Station
2633 - LANCER	0000388466	1596602	Chart Recording Gauge	0200865		District Station
2629 - WINCHESTER	0000394843	0173715	Electronic Recording Gauge	0200950		Customer Facilities
2629 - WINCHESTER	0000394912	0173715	Electronic Recording Gauge	0200971		Customer Facilities
2629 - WINCHESTER	0000394926	0173715	Electronic Recording Gauge	0210797		Customer Facilities
2631 - ASHLAND	0000395602	0193608	Electronic Recording Gauge	0210271		District Station

2629 - WINCHESTER	0000396716	0494305	Electronic Recording Gauge	0209696		Customer Facilities
2629 - WINCHESTER	0000397494	0494305	Electronic Recording Gauge	0200763		Customer Facilities
2621 - LEXINGTON	0000402586	0674805	Electronic Recording Gauge	0200572		Customer Facilities
2632 - MAYSVILLE	0000402616	1616705	Chart Recording Gauge	0200770		District Station
2621 - LEXINGTON	0000405101	0674805	Chart Recording Gauge	0206234		District Station
2623 - FRANKFORT	0000407926	0735005	Electronic Recording Gauge	0210590		Customer Facilities
2629 - WINCHESTER	0000409568	0494302	Electronic Recording Gauge	0210902		Customer Facilities
2621 - LEXINGTON	0000413245	0674805	Electronic Recording Gauge	0200524		Customer Facilities
2631 - ASHLAND	0000413608	0193612	Chart Recording Gauge	0210401		District Station
2631 - ASHLAND	0000413665	0193602	Chart Recording Gauge	0209769		District Station
2623 - FRANKFORT	0000418111	2398310	Electronic Recording Gauge	0200734		Customer Facilities
2623 - FRANKFORT	0000423000	0735002	Electronic Recording Gauge	0209912		Customer Facilities
2631 - ASHLAND	0000430330	0193602	Electronic Recording Gauge	0208474		Customer Facilities
2629 - WINCHESTER	0000430383	0494305	Electronic Recording Gauge	0201010		Customer Facilities
2629 - WINCHESTER	0000430746	1736902	Electronic Recording Gauge	0200700		Customer Facilities
2632 - MAYSVILLE	0000431945	1616705	Chart Recording Gauge	0200866		District Station
2623 - FRANKFORT	0000433548	0735002	Electronic Recording Gauge	0200962		Customer Facilities
2621 - LEXINGTON	0000434804	0674805	Electronic Recording Gauge	0210378		Customer Facilities
2621 - LEXINGTON	0000435557	0674805	Chart Recording Gauge	0210993		District Station
2623 - FRANKFORT	0000436881	0735002	Electronic Recording Gauge	0200886		Customer Facilities
2623 - FRANKFORT	0000437011	2098002	Electronic Recording Gauge	0200656		Customer Facilities
2621 - LEXINGTON	0000437079	0674805	Electronic Recording Gauge	0200946		Customer Facilities
2621 - LEXINGTON	0000439259	0674805	Electronic Recording Gauge	0210290		Customer Facilities
2623 - FRANKFORT	0000441341	2398302	Chart Recording Gauge	0200919		District Station
2621 - LEXINGTON	0000443367	0674805	Chart Recording Gauge	0200113		District Station
2623 - FRANKFORT	0000450053	2398302	Electronic Recording Gauge	0200899		Customer Facilities
2623 - FRANKFORT	0000450984	0735007	Electronic Recording Gauge	0200161		District Station
2629 - WINCHESTER	0000450986	1817102	Electronic Recording Gauge	0208575		District Station
2631 - ASHLAND	0000450993	0193602	Electronic Recording Gauge	0208464		Customer Facilities
2629 - WINCHESTER	0000462935	0494305	Electronic Recording Gauge	0210192		District Station
2623 - FRANKFORT	0000463494	0735005	Electronic Recording Gauge	0200146		District Station
2621 - LEXINGTON	0000463990	0674805	Electronic Recording Gauge	0211301		Customer Facilities
2629 - WINCHESTER	0000466439	0173702	Electronic Recording Gauge	0211319		Customer Facilities
2623 - FRANKFORT	0000467490	0735005	Chart Recording Gauge	0200162		District Station
2629 - WINCHESTER	0000498761	0173702	Electronic Recording Gauge	0211330		Customer Facilities
2621 - LEXINGTON	0000503310	0674805	Electronic Recording Gauge	0200586		Customer Facilities
2621 - LEXINGTON	0000533212	0674805	Electronic Recording Gauge	0206593		District Station
2633 - LANCER	0000533213	1195705	Electronic Recording Gauge	0200417		District Station

2633 - LANCER	0000533214	1195702	Electronic Recording Gauge	0200418		District Station
2633 - LANCER	0000533215	0714902	Electronic Recording Gauge	0200416		District Station
2621 - LEXINGTON	0000535454	0674805	Electronic Recording Gauge	0200568		Customer Facilities
2623 - FRANKFORT	0000543145	0735002	Electronic Recording Gauge	0200653		Customer Facilities
2621 - LEXINGTON	0000543174	0674805	Electronic Recording Gauge	0210682		Customer Facilities
2621 - LEXINGTON	0000543178	0674805	Electronic Recording Gauge	0210709		Customer Facilities
2631 - ASHLAND	0000543194	0895102	Electronic Recording Gauge	0210110		Customer Facilities
2623 - FRANKFORT	0000543255	2098005	Electronic Recording Gauge	0200237		District Station
2629 - WINCHESTER	0000543329	0494302	Electronic Recording Gauge	0210602		District Station
2621 - LEXINGTON	0000543558	0674805	Electronic Recording Gauge	0200598		Customer Facilities
2623 - FRANKFORT	0000544488	0735002	Electronic Recording Gauge	0208638		Customer Facilities
2621 - LEXINGTON	0000545052	0674805	Electronic Recording Gauge	0200578		Customer Facilities
2623 - FRANKFORT	0000545346	2398302	Electronic Recording Gauge	0209401		Customer Facilities
2623 - FRANKFORT	0000545445	2098002	Electronic Recording Gauge	0208672		District Station
2629 - WINCHESTER	0000552919	0975305	Electronic Recording Gauge	0208477		Customer Facilities
2631 - ASHLAND	0000554184	0193602	Electronic Recording Gauge	0208623		District Station
2621 - LEXINGTON	0000566259	0674802	Electronic Recording Gauge	0200605		Customer Facilities
2621 - LEXINGTON	0000572489	0674805	Electronic Recording Gauge	0200608		Customer Facilities
2621 - LEXINGTON	0000573718	0674805	Chart Recording Gauge	0200373		District Station
2621 - LEXINGTON	0000574990	0674805	Electronic Recording Gauge	0200532		Customer Facilities
2621 - LEXINGTON	0000575043	0674802	Electronic Recording Gauge	0200611		Customer Facilities
2623 - FRANKFORT	0000579515	0735005	Electronic Recording Gauge	0200651		Customer Facilities
2623 - FRANKFORT	0000604276	2098005	Electronic Recording Gauge	0200667		Customer Facilities
2621 - LEXINGTON	0000605578	0674802	Electronic Recording Gauge	0200597		Customer Facilities
2621 - LEXINGTON	0000605645	0674802	Electronic Recording Gauge	0200606		Customer Facilities
2629 - WINCHESTER	0000606073	1817102	Electronic Recording Gauge	0200958		District Station
2621 - LEXINGTON	0000606083	0674805	Electronic Recording Gauge	0200541		Customer Facilities
2621 - LEXINGTON	0000606084	0674805	Electronic Recording Gauge	0206517		Customer Facilities
2632 - MAYSVILLE	0000611477	1616702	Electronic Recording Gauge	0209136		Customer Facilities
2632 - MAYSVILLE	0000611478	0233802	Electronic Recording Gauge	0200952		District Station
2633 - LANCER	0000611479	0714902	Electronic Recording Gauge	0200413		District Station
2632 - MAYSVILLE	0000611482	0233815	Electronic Recording Gauge	0200292		District Station
2633 - LANCER	0000611484	1957702	Electronic Recording Gauge	0200415		District Station
2632 - MAYSVILLE	0000611490	1616702	Electronic Recording Gauge	0200211		District Station
2623 - FRANKFORT	0000614021	0735002	Electronic Recording Gauge	0209644		Customer Facilities
2623 - FRANKFORT	0000614022	0735002	Electronic Recording Gauge	0200637		Customer Facilities
2631 - ASHLAND	0000614272	0193612	Electronic Recording Gauge	0208466		Customer Facilities
2623 - FRANKFORT	0000614323	0735005	Electronic Recording Gauge	0200643		Customer Facilities

2631 - ASHLAND	0000614344	0895108	Electronic Recording Gauge	0200176		District Station
2633 - LANCER	0000614885	0714902	Electronic Recording Gauge	0200412		District Station
2623 - FRANKFORT	0000625097	0735005	Electronic Recording Gauge	0200638		Customer Facilities
2621 - LEXINGTON	0000625098	0674805	Electronic Recording Gauge	0200534		Customer Facilities
2621 - LEXINGTON	0000625099	0674805	Electronic Recording Gauge	0210153		Customer Facilities
2621 - LEXINGTON	0000625100	0674805	Electronic Recording Gauge	0200531		Customer Facilities
2623 - FRANKFORT	0000625782	2098002	Electronic Recording Gauge	0200907		Customer Facilities
2623 - FRANKFORT	0000631865	2098005	Electronic Recording Gauge	0211719		Customer Facilities
2621 - LEXINGTON	0000631942	0674805	Electronic Recording Gauge	0212013		Customer Facilities
2623 - FRANKFORT	0000640554	0735002	Electronic Recording Gauge	0210384		District Station
2621 - LEXINGTON	0000650200	0674805	Chart Recording Gauge	0200379		District Station
2631 - ASHLAND	0000650454	0193612	Electronic Recording Gauge	0208472		Customer Facilities
2621 - LEXINGTON	0000653057	0674805	Electronic Recording Gauge	0211978		District Station
2621 - LEXINGTON	0000653091	0674805	Electronic Recording Gauge	0200352		District Station
2621 - LEXINGTON	0000670614	0674805	Electronic Recording Gauge	0200601		Customer Facilities
2632 - MAYSVILLE	0000670623	1616705	Electronic Recording Gauge	0200785		Customer Facilities
2629 - WINCHESTER	0000670631	0494305	Electronic Recording Gauge	0210762		Customer Facilities

**COLUMBIA GAS OF KENTUCKY, INC.
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DATED MARCH 17, 2016**

6. Refer to Commission Staff's Second Request for Information (Staff's Second Request"), Item 8, second full sentence, lines 1 through 4. Provide the detailed information requested for the previous five winters.

Response:

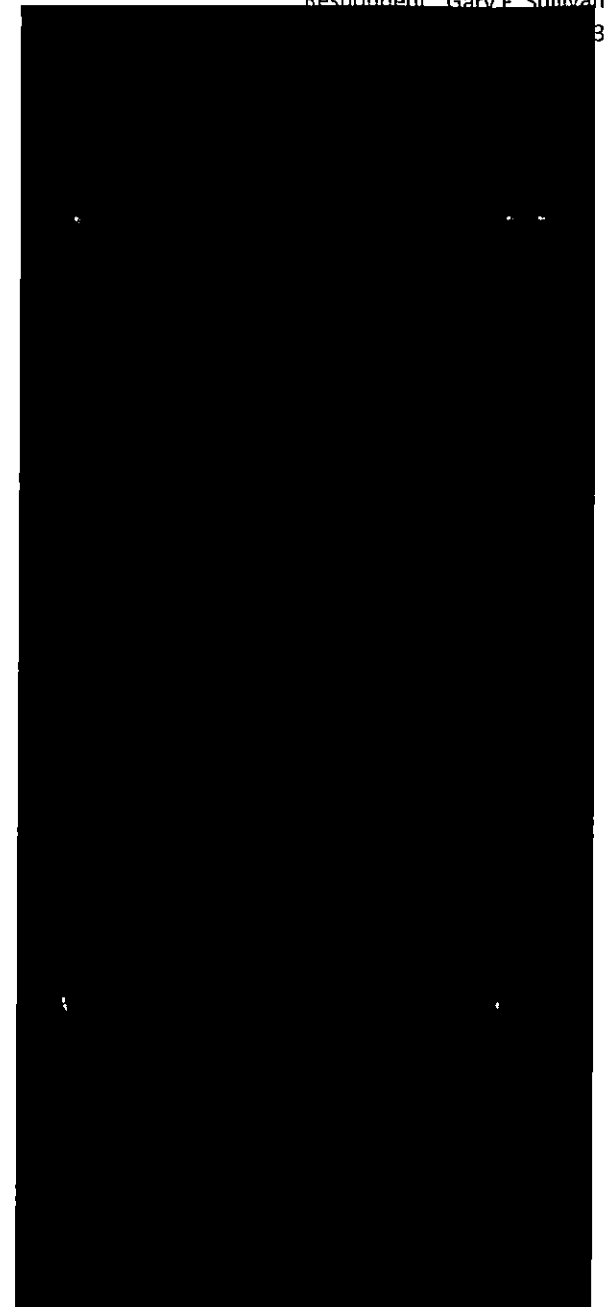
Columbia planned to survey 70 of the systems for which the deviation is being sought when the specified temperature thresholds were met. Occasionally, partial surveys are requested even if a threshold is not being met. As stated previously, the results of a pressure survey are noted on forms, reviewed and compared to Columbia's infrastructure model, but are not accumulated for retention. Since we may not have all the forms, we are unable to determine precisely how many times each survey was conducted, but we have indicated in the attachment if a pressure survey was planned including our best estimate for the number of times each survey was conducted each year.

Planned Survey	Winter 2015-2016	Winter 2014-2015	Winter 2013-2014	Winter 2012-2013	Winter 2011-2012	Operating Area	Station Number	System Number	System Name
						2621	1018	32010191	
Yes	2	4	9	1	1	2621	1026	32010193	
						2621	1027	32010134	
Yes	2	4	9	1	1	2621	1029	32010130	
						2621	1031	32010194	
						2621	1052	32010096	
						2621	1061	32010040	
						2621	1061	32010028	
						2621	1066	32010133	
						2621	1067	32010099	
						2621	1068	32010122	
Yes	2	4	9	1	1	2621	1072	32010135	
						2621	1094	32010101	
						2621	1097	32010086	
						2621	1100	32010038	
						2621	1112	32010091	
						2621	1113	32010108	
						2621	1115	32010107	
						2621	1118	32010109	
						2621	1119	32010127	
						2621	1122	32010085	
						2621	1129	32010042	
						2621	1135	32046001	
						2621	1136	32010079	
						2621	1142	32010092	
						2621	1145	32010034	
						2621	1146	32057001	
						2621	1147	32010076	
						2621	1149	32010037	
Yes	2	4	9	1	1	2621	1151	32010185	
						2621	1154	32010083	
						2621	1157	32010115	
						2621	1159	32010093	
						2621	1163	32010140	
						2621	1164	32010104	
						2621	1165	32010103	
						2621	1170	32010117	

						2621	1171	32010095
						2621	1172	32010189
						2621	1173	32010074
						2621	1176	32010126
						2621	1177	32010128
						2621	1180	32010053
						2621	1181	32010119
						2621	1182	32010139
						2621	1183	32010136
						2629	1186	32047001
						2621	1187	32010113
						2621	1195	32068001
						2621	1199	32010098
						2621	1203	32010144
						2621	1204	32010080
						2621	1209	32010090
						2621	1210	32010082
						2621	1211	32010123
						2621	1215	32010051
						2621	1217	32010192
Yes	2	4	9	1	1	2629	1230	32010165
Yes	2	4	9	1	1	2629	1230	32010166
Yes	2	4	9	1	1	2632	1237	32050001
Yes	2	4	9	1	1	2629	1240	32010180
Yes	2	4	9	1	1	2629	1251	32010176
Yes	2	4	9	1	1	2629	1273	32047003
Yes	2	4	9	1	1	2629	1276	32010188
Yes	2	4	9	1	1	2629	1277	32010172
Yes	2	4	9	1	1	2629	1278	32010174
Yes	2	4	9	1	1	2629	1279	32010175
Yes	2	4	9	1	1	2629	1280	32010179
Yes	2	4	9	1	1	2629	1282	32064001
Yes	2	4	9	1	1	2629	1285	32010182
Yes	2	4	9	1	1	2631	1352	32051029
Yes	2	4	9	1	1	2631	1366	32033001
Yes	2	4	9	1	1	2631	1367	32023001
Yes	2	4	9	1	1	2631	1375	32051008
Yes	2	4	9	1	1	2631	1377	32051021
Yes	2	4	9	1	1	2631	1379	32051025



Yes	2	4	9	1	1	2631	1405	32005003
Yes	2	4	9	1	1	2631	1406	32006001
						2633	1413	32039001
Yes	2	4	9	1	1	2633	1425	32012003
						2633	1430	32034001
Yes	2	4	9	1	1	2633	1434	32054001
Yes	2	4	9	1	1	2633	1435	32053001
Yes	2	4	9	1	1	2633	1439	32066002
						2633	1440	32017001
						2633	1441	32029001
						2633	1442	32056001
Yes	2	4	9	1	1	2632	1462	32048007
Yes	2	4	9	1	1	2632	1488	32065001
						2623	1523	32010067
Yes	2	4	9	1	1	2623	1526	32010058
						2623	1529	32010064
						2623	1533	32010072
Yes	2	4	9	1	1	2623	1536	32010068
Yes	2	4	9	1	1	2623	1538	32010071
						2623	1539	32010069
						2623	1542	32010161
Yes	2	4	9	1	1	2623	1543	32010070
						2623	1544	32010055
Yes	2	4	9	1	1	2623	1545	32010153
						2623	1547	32010063
Yes	2	4	9	1	1	2623	1556	32010046
Yes	2	4	9	1	1	2623	1564	32010154
						2623	1565	32010155
						2623	1568	32010156
						2623	1569	32010164
						2623	1570	32010159
Yes	2	4	9	1	1	2623	1585	32010005
Yes	2	4	9	1	1	2623	1586	32010007
						2623	1587	32010009
						2623	1590	32010006
						2623	1591	32010152
						2623	1594	32010148
						2623	1595	32010147
						2623	1597	32010162



32010163	1599	2623	2629	1	1	9	4	2	Yes
32010021	1617	2629	2629	1	1	9	4	2	Yes
32010025	1633	2629	2629	1	1	9	4	2	Yes
32010039	1635	2629	2629	1	1	9	4	2	Yes
32010022	1636	2629	2629	1	1	9	4	2	Yes
32055001	1638	2629	2629						
32010017	1640	2629	2629	1	1	9	4	2	Yes
32049003	1664	2629	2629	1	1	9	4	2	Yes
32049004	1669	2629	2629	1	1	9	4	2	Yes
32049005	1670	2629	2629	1	1	9	4	2	Yes
32049009	1671	2629	2629	1	1	9	4	2	Yes
32049002	1672	2629	2629	1	1	9	4	2	Yes
32049001	1673	2629	2629	1	1	9	4	2	Yes
32049010	1674	2629	2629	1	1	9	4	2	Yes
32001013	1684	2629	2629	1	1	9	4	2	Yes
32001015	1687	2629	2629	1	1	9	4	2	Yes
32001006	1688	2629	2629	1	1	9	4	2	Yes
32001021	1690	2629	2629	1	1	9	4	2	Yes
32001017	1691	2629	2629	1	1	9	4	2	Yes
32001008	1692	2629	2629	1	1	9	4	2	Yes
32001024	1693	2629	2629	1	1	9	4	2	Yes
32001019	1694	2629	2629	1	1	9	4	2	Yes
32001007	1695	2629	2629	1	1	9	4	2	Yes
32001005	1696	2629	2629	1	1	9	4	2	Yes
32010059	1851	2623	2623						
32010150	1853	2623	2623						
32010183	1856	2623	2623						
32010184	1857	2623	2623						
32010186	1858	2623	2623						
32010045	1859	2629	2629						
32007001	817715	2629	2623						
32019001	805544	2629	2629	1	1	9	4	2	Yes
32044001	817712	2629	2629	1	1	9	4	2	Yes
32041001	817714	2629	2629	1	1	9	4	2	Yes
32040001	817716	2629	2629	1	1	9	4	2	Yes
32011001	817717	2629	2629	1	1	9	4	2	Yes
32043001	817718	2629	2629	1	1	9	4	2	Yes
32045001	817719	2629	2629	1	1	9	4	2	Yes

Yes	2	4	9	1	1	2629	817720	32042001	[REDACTED]	5
						2629	817721	32038001		
						2633	817724	32018001		

KY PSC Case No. 2015-00084
Staff's Informal Conference Request No. 7
Respondent: Gary Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
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DATED MARCH 17, 2016**

7. State whether any of Columbia's sister companies have sought similar deviations in other jurisdictions? If so, state the jurisdiction, when the request was made, and the result.

Response:

807 KAR 5:022, Section 14(22)(a) is unique to Kentucky, as such, none of Columbia's affiliates have sought a similar deviation.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
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8. Refer to Columbia's response to Staff's Second Request, Item 9.
 - a) Describe how Columbia defines a large volume customer?
 - b) Describe the billing charts and electronic measurement of large volume customers.
 - (i) Do the billing charts and electronic measurement function in the same manner as a recording pressure gauge?
 - (ii) Does Columbia consider the existence of these billing charts and electronic measurement on the large volume customers as meeting the requirements of 807 KAR 5:022, Section 14(22) when no other recording pressure gauge exists on the distribution system?
 - (iii) Do any of the distribution systems included in Columbia's request for deviation contain large volume customers having billing charts or electronic measurement? If so, identify each system by station number.

Response:

- a. In the context of Item 9 of the second request, a large volume customer includes those customers having billing charts or electronic measurement that measure distribution system pressures.
- b. Gas is measured at many of our larger volume customers at distribution system pressure. The measured pressure would be the same as the distribution system pressure after considering the pressure drop across the service line. Since gas is measured at a pressure different from the conditions specified in Section 17 of Columbia's tariff, the meter index reading must be corrected in accordance with "the latest approved methods in use in the industry." This requires the pressure to be recorded so that calculations of the volume may be performed. The pressure may be recorded by either a paper recording chart or electronic pressure recorder.
 - i. The pressure recording feature of billing charts and electronic measurement equipment perform the same function as recording pressure gauges with one exception. On paper charts that measure by percent, the charts rotates with the volume of gas used rather than with time. As a result, if a customer with one of these charts is not using gas over a period neither the volume pen nor the pressure pen rotates. However, the pressure pen would still be responsive to

changes in pressure where an abnormal operating condition would be observed.

- ii. Yes.
- iii. Yes. The attachment in Staff's second question indicates the large volume customers by station number and the system in which they are found.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
DATED MARCH 17, 2016**

9. Describe how Columbia learns of abnormally high and low pressure events on its single supply distribution systems with regulator stations designed for over 100 customers, which are included in its deviation request.

Response:

If an abnormally low pressure event occurred, Columbia would learn of such an event in any one or more of several ways: when a customer calls with a no-gas complaint, during a regulator inspection, during a winter operations cold weather check, during a GMB audit trail, or when a Columbia Service Tech is investigating an abnormal operating condition on a customer's property.

If an abnormally high pressure event occurred, Columbia would learn of such an event during a regulator inspection, during a winter operations cold weather check, during a GMB audit trail, or when a Columbia Service Tech is investigating an abnormal operating condition on a customer's property.

KY PSC Case No. 2015-00084
Staff's Informal Conference Request No. 10
Respondent: Gary Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S INFORMAL CONFERENCE
REQUESTS FOR INFORMATION
DATED MARCH 17, 2016**

10. Refer to Columbia's Tariff—General Terms, Conditions, Rules and Regulations. Second Revised Sheet No. 67. Standard Delivery Pressure, which states:

-Company, in accordance with 807 KAR 5:022, Section 13(14): Standard Pressure adopts seven (7) inches water column as its standard pressure as measured at the outlet of Customer's meter."

Does Columbia agree that for its customers on distribution systems included in its deviation request. Columbia cannot determine whether this provision of its tariff is actually being met?

Response:

Columbia does not agree. The presence of a gauge within the distribution system or lack thereof does not mean that this provision of the tariff is met, rather, Columbia meets this element of the tariff through good design practices. Pressure recording instruments on distribution systems are remote from customers who

receive 7" w.c. delivery. Pressure losses occur across the mains, valves, service lines, and meters commensurate with demand of all customers supplied through the system as well as the size and capacity of the facilities. Additionally, many of our customers are supplied from elevated pressure systems where a service regulator is required to reduce the pressure to 7" w.c. The proper design of these facilities from source to meter outlet fulfills the standard delivery pressure element of the tariff.

COLUMBIA GAS OF KENTUCKY, INC.
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11. Refer to 807 KAR 5:022, Section 13(16)(a) which states:

The utility shall keep a complete record of all interruptions on its entire system or on major divisions of its system. The record shall show the cause of interruption, date, time, duration, remedy and steps taken to prevent recurrence. The Commission shall be notified of major interruptions as soon as they come to the attention of the utility and a complete report made after restoration of service.

Refer to 807 KAR 5:022, Section 13(16)(10) which states:

Interruptions of service, as used here, shall also mean the interval of time during which pressure drops below fifty (50) percent of such adopted standard pressure....

Describe what methods Columbia uses to comply with 807 KAR 5:022, Section 13 (16)(a) when pressure drops below fifty percent of the adopted standard pressure established in Columbia's Tariff.

Response:

Columbia reports all outages with a description, response, and steps to prevent reoccurrence. Columbia believes that the design of our systems, if there was to be a drop below fifty percent standard pressure there would be outages at the extremity of the systems reported to Columbia by our customers. Columbia meets this requirement with the written report to the Commission. Columbia also keeps records of no gas orders in the Distribution Information System.