



Gwen R. Pinson, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

April 18, 2019

Louisville Gas and Electric Company State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.lge-ku.com

Rick E. Lovekamp Manager Regulatory Strategy/Policy T 502-627-3780 rick.lovekamp@lge-ku.com

RE: APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR APPROVAL OF STATE WAIVER OF THE REASSESSMENT INTERVAL REQUIRED BY 49 C.F.R. 192.939 Case No. 2017-00482

Dear Ms. Pinson:

Enclosed please find and accept for filing Louisville Gas and Electric Company's ("LG&E") Responses to the Commission's Staff's First Request for Information in the above referenced matter.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Rick E. Lovekamp

## RECEIVED

#### COMMONWEALTH OF KENTUCKY

# APR 1 8 2019 PUBLIC SERVICE COMMISSION

#### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY FOR APPROVAL OF	)	
STATE WAIVER OF THE REASSESSMENT	)	CASE NO. 2017-00482
INTERVAL REQUIRED BY 49 C.F.R. § 192.939	)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
DATED APRIL 9, 2019

**FILED: APRIL 18, 2019** 

#### VERIFICATION

COMMONWEALTH OF KENTUCKY	)
	)
COUNTY OF JEFFERSON	)

The undersigned, **Peter Clyde**, being duly sworn, deposes and says that he is Manager Transmission Integrity and Compliance for Louisville Gas and Electric Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Peter Clyde

Notary Public

\_(SEAL)

My Commission Expires: Judy Schooler

Notary Public, ID No. 603967 State at Large, Kentucky

Commission Expires 7/11/2022

#### LOUISVILLE GAS AND ELECTRIC COMPANY

### Response to Commission Staff's First Request for Information Dated April 9, 2019

Case No. 2017-00482

### Question No. 1

Responding Witness: Peter Clyde

- Q-1. Provide LG&E's 2017 Annual Report, Natural or Other Gas Transmission and Gathering Systems, Form PHMSA 7100.2-1 (2017 Annual Report).
- A-1. Please see attached.

Attachment to Response to Question No. 1

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each violation are activated by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each violation are activated by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each violation of \$1,000,000 as provided in 49 USC 60122.

Clyde

OMB No. 2137-0522

Expires: 8/31/2020

0

U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

### ANNUAL REPORT FOR CALENDAR YEAR 2017 NATURAL OR OTHER GAS TRANSMISSION and GATHERING SYSTEMS

Initial Date Submitted	03/13/2018
Report Submission Type	SUPPLEME NTAL
Date Submitted	12/19/2018

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to be approximately 42 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <a href="http://www.phmsa.dot.gov/pipeline/library/forms">http://www.phmsa.dot.gov/pipeline/library/forms</a>.

PART A - OPERATOR INFORMATION	DOT USE ONLY	20187040 - 35128
OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID)  11824	2. NAME OF OPER LOUISVILLE G	RATOR: AS & ELECTRIC CO
3. RESERVED	4. HEADQUARTER  220 W MAIN ST, PO Street Address  LOUISVILLE City  State: KY Zip Code	O BOX 32010

5. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP: (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)

**Natural Gas** 

- 6. RESERVED
- 7. FOR THE DESIGNATED "COMMODITY GROUP", THE PIPELINES AND/OR PIPELINE FACILITIES INCLUDED WITHIN THIS OPID ARE: (Select one or both)

INTERstate pipeline – List all of the States and OSC portions in which INTERstate pipelines and/or pipeline facilities included under this OPID exist. etc.

INTRAstate pipeline – List all of the States in which INTRAstate pipelines and or pipeline facilities included under this OPID exist. **INDIANA, KENTUCKY** etc.

8. RESERVED

Expires: 8/31/2020

For the designated Commodity Group, PARTs B and D will be calculated based on the data entered in Parts L and P respectively. Complete Part C one time for all pipelines and/or pipeline facilities - both INTERstate and INTRAstate - included within this OPID.

PART B - TRANSMISSION PIPELINE HCA MILES						
	Number of HCA Miles					
Onshore	46.35					
Offshore	0					
Total Miles	46.35					

PART C - VOLUME TRANSPORTED IN TRANSMISSION PIPELINES (ONLY) IN MILLION SCF PER YEAR (excludesTransmission lines of Gas Distribution systems)		Check this box and do not complete PART C if this report only includes gathering pipelines or transmission lines of gas distribution systems.					
		Onshore	Offshore				
Natural Gas		31930					
Propane Gas	<del>-</del>						
Synthetic Gas							
Hydrogen Gas		-					
Landfill Gas							
Other Gas - Name:							

PART D - MILES OF	STEEL PI	PE BY COR	ROSION P	OTECTION	ĺσξ.					
		athodically tected	Steel Cat unpro	hodically tected						
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other	Total Miles
Transmission										
Onshore	.9	386.69	3.16	.02	0	0	7.04	0	0	397.81
Offshore	0	0	0	0	0	0	0	0	0	. 0
Subtotal Transmission	.9	386.69	3.16	.02	0	0	7.04	О	0	397.81
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	- <b>0</b> ، ب
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	Ô	0	0	0	0	0	0	0	o :
Total Miles	.9	386.69	3.16	.02	0	0	7.04	" ; O	. 0	397.81

<sup>1</sup>Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

	 4			
PART E – RESERVED	 		· 2	
	 -	<u> </u>		

Expires: 8/31/2020

For the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAstate pipeline facilities included within this OPID exist. Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than zero.

PARTs F and G					
The data reported in t	hese PARTs a	applies to: (select only	one)		-
□ Interstate	pipelines/pip	eline facilities			
⊠ Intrastate	pipelines/pip	eline facilities in the S	tate of INDIANA	(complete for each State)	

ART F - INTEGRITY INSPECTIONS CONDUCTED AND ACTIONS TAKEN BASED ON INSPECTION		
MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS		
a. Corrosion or metal loss tools		
b. Dent or deformation tools		
c. Crack or long seam defect detection tools		
d. Any other internal inspection tools, specify other tools:		
Internal Inspection Tools - Other		
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)		
ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS		-
<ul> <li>Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.</li> </ul>		
b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.		
c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:		
1. "Immediate repair conditions" [192.933(d)(1)]		
2. "One-year conditions" [192.933(d)(2)]		
3. "Monitored conditions" [192.933(d)(3)]		
4. Other "Scheduled conditions" [192.933(c)]		
MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING		
a. Total mileage inspected by pressure testing in calendar year.		-
b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment.		
c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT.		_
d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT.		
MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)		
a. Total mileage inspected by each DA method in calendar year.	- * *	
1. ECDA	Ī	
2. ICDA		
3. SCCDA		
b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	1~	
1. ECDA		
2. ICDA		
3. SCCDA		
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	1	
1. "Immediate repair conditions" [192.933(d)(1)]		

	Expires. 0/3 (/2020
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES	3
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	
1.Other Inspection Techniques	
<ul> <li>Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.</li> </ul>	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933©]	
6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR	
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a)	
b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b)	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4)	. ,
d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA SEGMENT:	3. 1
e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA SEGMENT:	
PART G- MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Se ONLY)	gment miles
a. Baseline assessment miles completed during the calendar year.	
b. Reassessment miles completed during the calendar year.	
c. Total assessment and reassessment miles completed during the calendar year.	

PARTs F and G		***					
The data reported in	n these PARTs ap <sub>l</sub>	olies to: (s	select only one)			3,	
□ Intersta	ate pipelines/pipeli	ine faciliti	es		j.		
⊠ Intrasta	te pipelines/pipelii	ne facilitie	s in the State o	F KENTUCK	(Y (complet	te for each State)	** 1

AND TAKES INCORPORTED IN CALCULAR VICAR MONO THE FOUL ON INCORPORT IN TOOL O	· v v v
MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	· · · · · · · · · · · · · · · · · · ·
a. Corrosion or metal loss tools	17.2
b. Dent or deformation tools	53.39
c. Crack or long seam defect detection tools	
d. Any other internal inspection tools, specify other tools:	
Internal Inspection Tools - Other	
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)	70.59
ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	
<ul> <li>Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.</li> </ul>	9

Attachment to Response to Question No. 1

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation

Form Approved

Form Approved for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

Clyde OMB No. 2137-0522

Expires: 8/31/2020 b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, 9 both within an HCA Segment and outside of an HCA Segment. c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of: 1. "Immediate repair conditions" [192.933(d)(1)] 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933(c)] 3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING a. Total mileage inspected by pressure testing in calendar year. b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment. c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT. d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT. 4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods) a. Total mileage inspected by each DA method in calendar year. :6 1. ECDA 2. ICDA .6 3. SCCDA b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment. 1. ECDA 2. ICDA 3. SCCDA c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of: 1. "Immediate repair conditions" [192.933(d)(1)] 2. "One-vear conditions" [192,933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933(c)] 5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES a. Total mileage inspected by inspection techniques other than those listed above in calendar year. 1.Other Inspection Techniques b. Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment. c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of: 1. "Immediate repair conditions" [192.933(d)(1)] 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933©] 6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a) 71.19 b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA g Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b) c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA SEGMENT: e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA SEGMENT: PART G- MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Segment miles ONLY)

Case No. 2017-00482

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

Attachment to Response to Question No. 1
Form Approved
OMB No. 2137-0522
Expires: 8/31/2020

a. Baseline assessment miles completed during the calendar year.	
b. Reassessment miles completed during the calendar year.	
c. Total assessment and reassessment miles completed during the calendar year.	

Expires: 8/31/2020

For the designated Commodity Group, complete PARTs H, I, J, K, L, M, P Q and R covering INTERstate pipelines and/or pipeline facilities for each State in which INTERstate systems exist within this OPID and again covering INTRAstate pipelines and/or pipeline facilities for each State in which INTRAstate systems exist within this OPID.

PARTs H, I	, J, K, L, M, F	P, Q, and R	<u>:1,-</u>	<u> </u>					
	eported in the				only one)				
PART H - N	IILES OF TR	ANSMISSIC	N PIPE B	Y NOMINA	L PIPE SIZ	E (NPS)			
<u>Ser</u>	NPS 4 or less	6	8	10	12	.14	16	18	20
	5.25	.75	3.53	4.98	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
Onshore	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
14.51	0 - 0; 0 - 0; 0	zes and Miles (	; 0 - 0; 0 - 0; 0	0 - 0; 0 - 0;					
14.51	NPS 4	f Onshore Pipe			40			10	20 3
	or less	60	8	10	12	14	16	18	20
	22	24	0 26	28	0	32	34	36	38
	0	0	0	0	0	0	0	0	0
Offshore	40.	- 42	44	46	48	,52	56	58 and	
	0	0	0	0	0	0	0	over	<u> </u>
		zes and Miles ( - 0; 0 - 0; 0 - 0			,	<del></del>	<u>'</u>		
<del></del>	Total Miles o	f Offshore Pipe	– Transmissi	on					
· 0									
· · · · · · · · · · · · · · · · · · ·	ILES OF GA	THERING P	IPE BY NO	MINAL PIF	PE SIZE (N	PS)	-		÷ . , , .
7.	ILES OF GA	THERING P	IPE BY NO	MINAL PIF	PE SIZE (N	PS)	16	18	20
7.	NPS 4	<del>-</del> <del>-</del> <del>-</del>				<u> </u>	16	18	0
PART I - M	NPS 4 or less	6	8	10	12	14	1		<del></del>

									Expire	s: 8/31/2020
	0	0	0	0	0	0	0	0		
	Addition	al Sizes and Miles	(Size – Miles;):	0 - 0; 0 - 0; 0 -	- 0; 0 - 0; 0	- 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;	;		
0	Total Mi	les of Onshore Typ	e A Pipe – Gath	ering						-
	NPS 4		8	10	12	14	. 16	4.	18	20
	0	0	0	0	0	0	0		0	0
	22	24	26	28	- 30	32	. 34		36:	38
Onshore	0	0	0	0	0	0	0	Ť	0	0
Туре В	40	42	44	46	48	52	56	58 and over		7,
	0	0	0	0	0	0	0	0		
	Addition	al Sizes and Miles	(Size Miles;):	0 - 0; 0 - 0; 0	- 0; 0 - 0; 0	- 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;			
0	Total Mi	les of Onshore Typ	e B Pipe Gath	nering		_				
	NPS 4		8	10	12	14	16		18	20
	0	0	0	0	0	0	0		0	0
	22	24	26	28	30	32	34		36	. 38
Offshore	0	0	0	0	0	0	0		0	0
	40	42	44	46	48	52	56	58 and over	1	
	0	0	0	0	0	0	0	0		
PART 1 ± I	MII ES OF	PIPE BY DEC	ADF INSTA						Taranta Taranta	
Decade Pip		Unknown	Pre-40	1940 - 1	1949 1	950 - 1959	1960 - 1	969	- 1	970 - 1979
Installed Transmiss	ion		<u>*</u>					1		· _ ·
Onshore		.01	0	0		0 ,	0			.05
Offshore	<del></del>		<del>                                     </del>	<del>            </del>		<del></del>				
Subtotal Trai	nsmission	.01 -	70	0	r	0	. 0			.05
Gathering		.01					<u>.</u>			
Onshore T	vpe A	0	0	0		0	0			0
Onshore T		0	0	0	-	0	0			
Offshore	,,,,,	<del></del>	<del></del>	<u> </u>	-  -			_		
	Gathering	0	0	0		0	. 0	- ,	,	.O
Total Miles		.01	0	0		0	0		2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	.05
Decade Pip	е	1980 - 1989	1990 - 1999	2000 - 2	2009 2	010 - 2019			*	Total Miles
Transmiss	ion									
Onshore		3.41	1.27	3.58	3	6.18				14.5
Offshore		<del></del>								
Subtotal Tra	iooion	2'44:	1 17	1 250	s :	6.40				115

3.41

1.27

Subtotal Transmission

Gathering

14.5

3.58

6.18

					L	APII 00. 0	"O 1/20	20
Onshore Type A	0	0	0	0	-,	al a	Ó	
Onshore Type B	0	0	0	0	, e		<b>Q</b> ,,	-
Offshore								* * * * * * * * * * * * * * * * * * * *
Subtotal Gathering	0	0 -	0	0	*		0	
Total Miles	3.41	1.27	3.58	6.18			14.5	

ONSHORE Steel pipe Less than 20% SMYS	Class I	Class 2	CLASS LOCATION				
eel pipe Less than 20% SMYS			Class 3	Class 4			
	5.58	0	.11	0	5.69		
Steel pipe Greater than or equal to 0% SMYS but less than 30% SMYS	0	0	0	0	0		
Steel pipe Greater than or equal to 10% SMYS but less than or equal to 10% SMYS	0	0	0	0	0		
Steel pipe Greater than 40% SMYS out less than or equal to 50% SMYS	0	0	0	0	0		
Steel pipe Greater than 50% SMYS out less than or equal to 60% SMYS	0	0	0	0	0		
Steel pipe Greater than 60% SMYS out less than or equal to 72% SMYS	0	0	0	0	0		
Steel pipe Greater than 72% SMYS out less than or equal to 80% SMYS	0	0	0	0	0		
Steel pipe Greater than 80% SMYS	0	0	0	0	0		
Steel pipe Unknown percent of SMYS	2.7	0	.22	0	2.92		
All Non-Steel pipe	5.01	.88	0	0	5.89		
Onshore Totals	13.29	.88	.33	. 0	14.5		
OFFSHORE	Class I						
ess than or equal to 50% SMYS	0						
Greater than 50% SMYS but less than or equal to 72% SMYS	0						
Steel pipe Greater than 72% SMYS	0		- <sub>1</sub> .,				
Steel Pipe Unknown percent of SMYS	0						
All non-steel pipe	0	177	n dev	<u> </u>			

PARTI - MILE	S OF PIPE BY CLA	SS LOCATION

**Total Miles** 

13.29

		Class L	ocation		Total	HCA Miles in the IMP
	Class I	Class 2	Class 3	Class 4	Class Location Miles	Program
Transmission						
Onshore	13.29	.88	.33	0	14.5	0
Offshore	0	0	0	0	0	
Subtotal Transmission	13.29	.88	.33	0	14.5	
Gathering						

14.5

Total Miles	13.29	.88	.33	0	14.5	0
Subtotal Gathering	0	0	0	0	0	
Offshore	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	
Onshore Type A	0	0	0	0	0	

#### PART M - FAILURES, LEAKS, AND REPAIRS

#### PART M1 - ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

		Transmission	on Leaks,	and Failures		Gathering Leaks			
		Lea	ks		Failures in	Onshor	e Leaks	Offshore Leaks	
[	Onsh	ore Leaks	Offshore Leaks		HCA				
Cause	HCA	Non-HCA	HCA	Non-HCA	Segments	Type A	Type B		
External Corrosion		0		0					
Internal Corrosion		0		0					
Stress Corrosion Cracking		0		0					
Manufacturing		0		0					
Construction		0		0					
Equipment		0		0					
Incorrect Operations		0		0					
Third Party Damage/Mecha	nical D	amage							
Excavation Damage		0		0					
Previous Damage (due to Excavation Activity)		0		0					
Vandalism (includes all Intentional Damage)		0		0					
Weather Related/Other Out	side Fo	rce							
Natural Force Damage (all)		0		0					
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)		0		0					
Other		0		0					
Total		0		0					

#### PART M2 - KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR

Transmission		Gathering						
PART M3 - LEAKS ON FEDERAL	ART M3 - LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPA							
Transmission		Gathering						
		Onshore Type A						
Onshore	0	Onshore Type B						
ocs	0	ocs	0					
Subtotal Transmission	0	Subtotal Gathering	0					
Total		0						

		teel Cathodically Steel Cathodically protected unprotected							_	
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other <sup>2</sup>	Total Miles
Transmission										
Onshore	0	8.6	.01	0	0	0	5.89	0	0	14.5
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	0	8.6	.01	0	0	0	5.89	0	0	14.5
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	·. 0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	0	0	О	0	0	0	0	o	0
Total Miles	. 0	8.6	.01	0	0	0	5.89	0	0	14.5

<sup>&</sup>lt;sup>1</sup>Use of Composite pipe requires PHMSA Special Permit or waiver from a State <sup>2</sup>specify Other material(s):

Part Q - Gas Tr	ansmi	ission N	/liles b	y §192.6	19 M	AOP Det	ermin	ation Me	thod					
	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other¹ Total	Other Incomplete Records
Class 1 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA)	.88		12.41		0		0		0		0		0	
Class 2 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	.88		0		0		0		0		0		0	
Class 3 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 3 (not in HCA)	0	0	.34	0	0	0	0	0	0	0	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	1.76	0	12.75	0	0	0	. 0	0	, 0 ^	0	0	0	Õ	0
Grand Total								14.51						
Sum of Total row	for all "	Incomple	ete Rec	ords" colu	mns			0 -	I					

<sup>1</sup>Specify Other method(s):

Class 1 (in HCA)	Class 1 (not in HCA)	
Class 2 (in HCA)	Class 2 (not in HCA)	
Class 3 (in HCA)	Class 3 (not in HCA)	
Class 4 (in HCA)	Class 4 (not in HCA)	

		<del></del>							
	PT ≥ 1.	25 MAOP	1.25 MAOF	P > PT ≥ 1.1 MAOP	PT < 1.1 or No PT				
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE			
Class 1 in HCA	0	0	0	0	0	0			
Class 2 in HCA	0	Ò	Ö	0	0	0			
Class 3 in HCA	0	0	0	0	0	0			
Class 4 in HCA	0	0	0	0	0	0			
in HCA subTotal	0	0	0	0	0	0			
Class 1 not in HCA	.02	10.04	0	0	0	3.23			
Class 2 not in HCA	0	0	Ō	0	0	.88			
Class 3 not in HCA	0	.36	0	0	0	0			
Class 4 not in HCA	0	0	0	0	0	0			
not in HCA subTotal	.02	10.4	0	. 0	0	4.11			
Total	.02	10.4	0	. 0	0	4.11			
PT ≥ 1.25 MAOP Tota	nl		10.42	Total Miles Internal In	.02				
1.25 MAOP > PT ≥ 1.	1 MAOP Total		0	Total Miles Internal In	14.51				
PT < 1.1 or No PT To	tal	-	4.11		Grand Total	14.53			
<del></del>		Grand Total	14.53						

#### PARTs H, I, J, K, L, M, P, Q, and R

The data reported in these PARTs applies to: (select only one)

**INTRASTATE** pipelines/pipeline facilities KENTUCKY

	NPS 4 or less	6	8	10	12	14	16	18	20
	30.37	10.17	20.55	1.3	98.67	0	85.11	0	128.26
	22	24	26	28	- 30	32	34	36	38
	2.48	6.39	0	0	.02	0	0	0	0
Onshore	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	o	0	0	
			(Size – Miles;): 0; 0 - 0; 0 - 0; 0	- 0; 0 - 0;					
383.32	Total Miles o	of Onshore Pip	e – Transmissio	n					
	NPS 4 or less	6	8	10	12	14	16	18	20

22 -

Offshore

	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and	
	0	0	0	0	0	0	0	0	
	Additional Si 0 - 0; 0 - 0; 0	izes and Miles ( ) - 0; 0 - 0; 0 - 0	(Size – Miles; ; 0 - 0; 0 - 0;	): D - 0; 0 - 0;					
0	Total Miles o	of Offshore Pipe	- Transmiss	ion					
PART I - M	ILES OF GA	THERING P	IPE BY NO	OMINAL PIF	PE SIZE (N	IPS)			
	NPS 4 or less	6	8	. 10	12	- 14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28.	. 30	32	34	36	38 -
Onshore Type A	0	0	0	0	0	0	0	0	0
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	40	42	44	` 46	48	52		58 and over	
	0	0	0	0	0	0	0	0	
	Additional Si	izes and Miles (	Size – Miles;	): 0 - 0; 0 - 0; 0	- 0; 0 - 0; 0 -	0; 0 - 0; 0 - 0; 0	0 - 0; 0 - 0;		
0`	Total Miles o	of Onshore Type	e A Pipe – Ga	thering					
0`	Total Miles of NPS 4 or less	of Onshore Type	e A Pipe – Ga 8	thering	12	14	16	18	20
<u> </u>	NPS 4	1			12	14	16	18	20
o`	NPS 4 or less	6	8	10	·	<u> </u>		0	
Onshore	NPS 4 or less 0	6	0	10	0 30 0	0	0 34 0	0 36 0	0
Onshore	NPS 4 or less 0	6 0 24	8 0 26	10 0 28	30	0 32	0 34 0	36	0 38
Onshore Type B	NPS 4 or less 0 22 0	6 0 24 0	8 0 26 0	10 0 28 0	0 30 0	0 32 0	0 34 0	0 36 0 58 and	0 38 0
Onshore	NPS 4 or less 0 22 0 40	6 0 24 0 42	8 0 26 0 44	10 0 28 0 46	0 30 0 48	0 32 0 52	0 34 0 56 0	0 36 0 58 and over	0 38 0
Onshore	NPS 4 or less 0 22 0 40 Additional Si	6 0 24 0 42	8 0 26 0 44 0 (Size – Miles;	10 0 28 0 46 0	0 30 0 48	0 32 0 52	0 34 0 56 0	0 36 0 58 and over	0 38 0
Onshore Гуре В	NPS 4 or less 0 22 0 40 0 Additional Si Total Miles of	6 0 24 0 42 0 izes and Miles (	8 0 26 0 44 0 (Size – Miles;	10 0 28 0 46 0	0 30 0 48	0 32 0 52	0 34 0 56 0	0 36 0 58 and over	0 38 0
Onshore Type B	NPS 4 or less 0 22 0 40 0 Additional Si	6 0 24 0 42 0 izes and Miles (	8 0 26 0 44 0 (Size – Miles;	10 0 28 0 46 0 0: 0 - 0; 0 - 0; 0	0 30 0 48 0 -0;0-0;0-	0 32 0 52 0 0; 0 - 0; 0 - 0; 0	0 34 0 56 0 0 - 0; 0 - 0;	0 36 0 58 and over	0 38 0
Onshore Гуре В	NPS 4 or less 0 22 0 40 0 Additional Si Total Miles of NPS 4 or less	6 0 24 0 42 0 izes and Miles ( of Onshore Type	8 0 26 0 44 0 (Size – Miles; e B Pipe – Ga	10 0 28 0 46 0 0: 0 - 0; 0 - 0; 0	0 30 0 48 0 -0; 0 - 0; 0 -	0 32 0 52 0 0; 0 - 0; 0 - 0; 0	0 34 0 56 0 0-0; 0-0;	0 36 0 58 and over 0	0 38 0
Onshore Type B	NPS 4 or less 0 22 0 40  Additional Si Total Miles of less 0	6 0 24 0 42 0 izes and Miles (of Onshore Type	8 0 26 0 44 0 (Size – Miles; e B Pipe – Ga 8	10 0 28 0 46 0 0: 0 - 0; 0 - 0; 0 othering	0 30 0 48 0 -0; 0 - 0; 0 -	0 32 0 52 0 0; 0 - 0; 0 - 0; 0	0 34 0 56 0 0-0; 0-0; 16 0 34	0 36 0 58 and over 0 18 0 36 0 36 0	20 0 38 0
Onshore Type B	NPS 4 or less 0 22 0 40 0 Additional Si Total Miles of or less 0 22	6 0 24 0 42 0 izes and Miles ( of Onshore Type 6 0 24	8 0 26 0 44 0 (Size – Miles; e B Pipe – Ga 8 0 26	10 0 28 0 46 0 0: 0 - 0; 0 - 0; 0 athering 10 0	0 30 0 48 0 -0; 0 - 0; 0 -	0 32 0 52 0 0; 0 - 0; 0 - 0; 0	0 34 0 56 0 0-0; 0-0; 16 0 34	0 36 0 58 and over 0 18 0 36	20 0 38 0
Onshore Type B	NPS 4 or less 0 22 0 40 Additional Si Total Miles of less 0 22 0	6 0 24 0 42 0 izes and Miles (of Onshore Type 6 0 24 0	8 0 26 0 44 0 (Size – Miles; e B Pipe – Ga 8 0 26 0	10 0 28 0 46 0 0: 0 - 0; 0 - 0; 0 0thering 10 0 28 0	0 30 0 48 0 -0; 0 - 0; 0 -	0 32 0 52 0 0; 0 - 0; 0 - 0; 0	0 34 0 56 0 0-0; 0-0; 16 0 34	0 36 0 58 and over 0 18 0 36 0 58 and 0	20 20 38 0
Onshore Type B	NPS 4 or less 0 22 0 40 Additional Si Total Miles of less 0 22 0 40 0	6 0 24 0 izes and Miles (of Onshore Type 6 0 24 0 42	8 0 26 0 44 0 (Size – Miles; e B Pipe – Ga 8 0 26 0 44	10 0 28 0 46 0 0:0-0;0-0;0 thering 10 0 28 0 46 0	0 30 0 48 0 -0; 0 - 0; 0 -	0 32 0 52 0 0; 0 - 0; 0 - 0; 0 14 0 32 0 52 0	0 34 0 56 0 0-0; 0-0; 16 0 34 0 56	0 36 0 58 and over 0 18 0 36 0 58 and over 1 0	20 20 38 0

			<u></u> _			Expires: 8/31/2020_
Decade Pipe Installed	Unknown	Pre-40	1940 - 1949	1950 - 1959	1960 - 1969	1970 - 1979
Transmission						
Onshore	4.6	0	0	84.01	65.19	69.12
Offshore	-					
Subtotal Transmission	4.6	0	0 7	84.01	65.19	69.12
Gathering						
Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore					-	
Subtotal Gathering	0	0	. 0 -	0	<b>0</b> 3	0
Total Miles	4.6	0	0 .	84.01	65.19	69.12
Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019		Total Miles
Transmission						
Onshore	50.84	52.49	22.34	34.73		383.32
Offshore						
Subtotal Transmission	50.84	52.49	22.34	34.73		383.32
Gathering						
Onshore Type A	0	0	0	0		0
Onshore Type B	0	0	0	0		0
Offshore						
Subtotal Gathering	0	0	0	0		. 0
Total Miles	50.84	52.49	22.34	34.73		383.32

ONSHORE		CLASS L	OCATION		Total Miles
ONSHORE	Class I	Class 2	Class 3	Class 4	]
Steel pipe Less than 20% SMYS	27.8	4.03	9.2	0	41.03
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	23.46	11.23	32.93	0	67.62
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	12.05	.62	22.06	0	34.73
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	43.26	15.82	6.56	0	65.64
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	0	0	0	0	0
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	0	0	0	0	0
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0
Steel pipe Unknown percent of SMYS	81.76	21.19	70.19	0	173.14
All Non-Steel pipe	1.15	0	0	0	1.15
Onshore Totals	189.48	52.89	140.94	0	383.31

		Expires: 8/31/2
OFFSHORE	Class I	
Less than or equal to 50% SMYS	0	
Greater than 50% SMYS but less than or equal to 72% SMYS	0	
Steel pipe Greater than 72% SMYS	0	
Steel Pipe Unknown percent of SMYS	0	
All non-steel pipe	0	
Offshore Total	0	
Total Miles	189.48	3

#### PART L - MILES OF PIPE BY CLASS LOCATION

		Class L	ocation		Total	HCA Miles in the IMP
	Class I	Class 2	Class 3	Class 4	Class Location Miles	Program
Transmission						
Onshore	189.48	52.89	140.94	0	383.31	46.35
Offshore	0	0	0	0	0	
Subtotal Transmission	189.48	52.89	140.94	0	383.31	
Gathering						
Onshore Type A	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	
Offshore	0	0	0	0	0	
Subtotal Gathering	0	0	0	0	0	
Total Miles	189.48	52.89	140.94	0	383.31	46.35

#### PART M - FAILURES, LEAKS, AND REPAIRS

#### PART M1 - ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

		Transmissi	on Leaks	, and Failures			Gathering	Leaks	
I		Lea	ks		Failures in	Onshor	e Leaks	Offshore Leaks	
	Onsh	ore Leaks	Offsh	ore Leaks	HCA				
Cause	HCA	Non-HCA	HCA	Non-HCA	Segments	Type A	Type B		
External Corrosion	0	1	0	0	0	0	0	0	
Internal Corrosion	0	0	0	0	0	0	0	0	
Stress Corrosion Cracking	0	0	0	0	0	0	0	0	
Manufacturing	0	0	0	0	0	0	0	0	
Construction	0	0	0	0	0	0	0	0	
Equipment	0	3	0	0	0	0	0	0	
Incorrect Operations	0	0	0	0	0	0	0	0	
Third Party Damage/Mecha	nical D	amage							
Excavation Damage	0	0	0	0	0	0	0	0	
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0	
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	0	
Weather Related/Other Out	side Fo	rce							
Natural Force Damage (all)	0	0	0	0	0	0	0	0	
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	0	
Total	0	4	0	0	0	0	0	0	

Expires: 8/31/2020

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

Attachment to Response to Question No. 1 Form Approved Clyde
OMB No. 2137-0522

Transmission	0	Gathering 0							
PART M3 - LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR									
Transmission		Gatherin	g						
Onethorn		Onshore Type A	0						
Onshore	U	Onshore Type B	0						
OCS	_ 0	ocs	0						
Subtotal Transmission	. 0	Subtotal Gathering	0 .						
Total		0							

		Steel Cathodically protected		Steel Cathodically			_		-	-
	pro Bare	Coated	unpro Bare	ctected Coated	Cast	Wrought Iron	Plastic	Composite <sup>1</sup>	Other <sup>2</sup>	Total Miles
Transmission										
Onshore	.9	378.09	3.15	.02	0	0	1.15	0	0	.383.31
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	.9	378.09	3.15	.02	. 0	0	1.15	0	О	383.31
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0 -
Onshore Type B	0	0	0	0	0	0	0	0	0	, , O *
Offshore	0	0	0	0	0	0	0	0	0	0 .
Subtotal Gathering	0.	О	0	0	. 0	0	0	0	О.	0
Total Miles	.9	378.09	3.15	.02	O	0	1.15	Ō	, 0	383.31

<sup>&</sup>lt;sup>1</sup>Use of Composite pipe requires PHMSA Special Permit or waiver from a State <sup>2</sup>specify Other material(s):

Part Q - Gas Ti	(a)(1)	(a)(1)	(a)(2)			г —							i	
	Total	Incomplete Records	Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other <sup>1</sup> Total	Other Incomplete Records
Class 1 (in HCA)	.11	0	.01	.01	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA)	52.63		95.65		0		0		41.08		0		0	
Class 2 (in HCA)	.15	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	13.26		23.62		0		0		15.87		0		0	_
Class 3 (in HCA)	7.49	0	23.52	3.67	0	0	0	0	15.08	6.75	0	0	0	0
Class 3 (not in HCA)	10.37	.02	45.02	7.57	0	0	0	0	39.47	7.98	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Total	84.01	.02	187.8 2	11.25	0	.0	0	,0	111.5	14.73	0	0	Ò	0
Grand Total								383.33						· · · · · ·
Sum of Total row	for all "	Incomple	te Rec	ords" colu	mns			26 ੂ						

<sup>1</sup>Specify Other method(s):

Class 1 (in HCA)	Class 1 (not in HCA)	
Class 2 (in HCA)	Class 2 (not in HCA)	
Class 3 (in HCA)	Class 3 (not in HCA)	
Class 4 (in HCA)	Class 4 (not in HCA)	

Part R – Gas Transir	ission Miles by	Pressure Test	(PT) Range an	d Internal Inspection		
	PT ≥ 1.5	25 MAOP	1.25 MAO	P > PT ≥ 1.1 MAOP	PT < 1.1 or	No PT
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE
Class 1 in HCA	.11	0	Ō	0	.01	0
Class 2 in HCA	.15	0	0	0	0	0
Class 3 in HCA	26.37	.7	0	0	18.42	.59
Class 4 in HCA	0	0	0	0	0	0
in HCA subTotal	26.63	.7	. 0 ^	.0	18.43	.59
Class 1 not in HCA	65.98	55.7	0	.33	44.19	23.16
Class 2 not in HCA	17.38	9.29	0	.36	15.59	10.13
Class 3 not in HCA	42.23	4.69	0	0	45.2	2.76
Class 4 not in HCA	0	0	0	0	0	0
not in HCA subTotal	125.59	69.68	0	.69	104.98	36.05
Total	152,22	70.38	0	.69	123.41	36.64
PT ≥ 1.25 MAOP Tota	al		222.6	Total Miles Internal Ins	spection ABLE	275.63
1.25 MAOP > PT ≥ 1.	1 MAOP Total		.69	Total Miles Internal Ins	spection NOT ABLE	107.71
PT < 1.1 or No PT To	tal		160.05		Grand Total	383.34

Expires: 8/31/2020

For the designated Commodity Group, complete PART N one time for all of the pipelines and/or pipeline facilities included within this OPID, and then also PART O if any gas transmission pipeline facilities included within this OPID have Part L HCA mile value greater than zero.

PART N - PREPARER SIGNATURE		and the second second	
Elliott Bauer		(502)364-8507 Telephone Number	
Preparer's Name(type or print)		releptione raditibes	
Civil Engineer			
Preparer's Title			
Elliott.Bauer@ige-ku.com			•
Preparer's E-mail Address			
PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M1)			
PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M1)		(502)627-4830	<u> </u>
PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M1)  Lonnie E Bellar	·	(502)627-4830 Telephone Number	· · ·
	·		· · ·
Lonnie E Bellar  Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by			
Lonnie E Bellar  Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)	· · · · · · · · · · · · · · · · · · ·		· · ·
Lonnie E Bellar  Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)  Senior Vice President Operations  Senior Executive Officer's title certifying the information in PARTs B, F, G, and M as required by	· , · · · · · · · · · · · · · · · · · ·		

#### LOUISVILLE GAS AND ELECTRIC COMPANY

#### Response to Commission Staff's First Request for Information Dated April 9, 2019

#### Case No. 2017-00482

#### **Question No. 2**

#### Responding Witness: Peter Clyde

- Q-2. Refer to the 2017 Annual Report, Part F, Section 2, pages 4-5, in which LG&E reported that it inspected 17.2 miles of transmission pipeline in 2017 using metal loss in-line inspection (ILI) tools and 53.39 miles using dent or deformation ILI tools and based on these inspections, LG&E identified and excavated 9 anomalous conditions, none of which were located in a High Consequence Area (HCA).
  - a. State how many miles of the Calvary Pipeline were inspected in 2017 by metal loss tools and by dent or deformation tools.
  - b. How many of the nine anomalous conditions that were excavated were located on the Calvary Pipeline?
- A-2.
- a. The mileage of pipeline inspected in 2017 is listed in Part F, Section 1, of the Company's 2017 Annual Report. The mileage indicated in Section 1 includes approximately 53 miles of dent or deformation tool inspections and no metal loss tool inspections on the Calvary pipeline. Although multiple attempts were made to inspect the Calvary pipeline with a metal loss tool in 2017, a complete inspection of the Calvary pipeline was not accomplished in 2017.
- b. None of the nine anomalous conditions that were excavated were located on the Calvary pipeline.

#### LOUISVILLE GAS AND ELECTRIC COMPANY

### Response to Commission Staff's First Request for Information Dated April 9, 2019

Case No. 2017-00482

#### Question No. 3

Responding Witness: Peter Clyde

- Q-3. Provide LG&E's 2018 Annual Report, Natural or Other Gas Transmission and Gathering Systems, Form PHMSA 7100.2-1 (2018 Annual Report).
- A-3. Please see attached.

Clyde

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation Form Approved OMB No. 2137-0522 for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

Expires: 8/31/2020

U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

#### **ANNUAL REPORT FOR CALENDAR YEAR 2018** NATURAL OR OTHER GAS TRANSMISSION and **GATHERING SYSTEMS**

Initial Date Submitted	03/08/2019
Report Submission Type	INITIAL
Date Submitted	

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to be approximately 42 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

PART A - OPERATOR INFORMATION	DOT USE ONLY	20190413 - 35749			
1. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID)	2. NAME OF OPER LOUISVILLE G	RATOR: GAS & ELECTRIC CO			
11824					
3. RESERVED	4. HEADQUARTER	RS ADDRESS:			
	220 W MAIN ST, P Street Address	O BOX 32010			
	LOUISVILLE City				
	State: KY Zip Code: 40202				
	State: <b>KY</b> Zip Code	e: 40202			
5. THIS REPORT PERTAINS TO THE FOLLOWING COMMODI and complete the report for that Commodity Group. File a separa	TY GROUP: (Select Con	nmodity Group based on the predominant gas carried			
	TY GROUP: (Select Con	nmodity Group based on the predominant gas carried			
and complete the report for that Commodity Group. File a separa	TY GROUP: (Select Con	nmodity Group based on the predominant gas carried			
and complete the report for that Commodity Group. File a separa	TY GROUP: (Select Con	nmodity Group based on the predominant gas carried			
and complete the report for that Commodity Group. File a separa	TY GROUP: (Select Con	nmodity Group based on the predominant gas carried			
and complete the report for that Commodity Group. File a separa  Natural Gas	TY GROUP: (Select Con	nmodity Group based on the predominant gas carried			
and complete the report for that Commodity Group. File a separa  Natural Gas  6. RESERVED	TY GROUP: (Select Commo	nmodity Group based on the predominant gas carried odity Group included in this OPID.)			
and complete the report for that Commodity Group. File a separa  Natural Gas	TY GROUP: (Select Commo	nmodity Group based on the predominant gas carried odity Group included in this OPID.)			
and complete the report for that Commodity Group. File a separa  Natural Gas  6. RESERVED  7. FOR THE DESIGNATED "COMMODITY GROUP", THE PIPE	TY GROUP: (Select Combined report for each Commined report for each Com	nmodity Group based on the predominant gas carried odity Group included in this OPID.)  WE FACILITIES INCLUDED WITHIN THIS OPID ARE:  Ins in which INTERstate			

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For the designated Commodity Group, PARTs B and D will be calculated based on the data entered in Parts L and P respectively. Complete Part C one time for all pipelines and/or pipeline facilities - both INTERstate and INTRAstate - included within this OPID.

PART B - TRANSMISSION PIPELINE HCA MILES						
	Number of HCA Miles					
Onshore	40.9					
Offshore	0					
Total Miles	40.9					

PART C - VOLUME TRANSPORTED IN TRANS PIPELINES (ONLY) IN MILLION SCF PER YEA (excludesTransmission lines of Gas Distribut	Check this box and do not complete PART C if this report only includes gathering pipelines or transmission lines of gas distribution systems.			
		Onshore		Offshore
Natural Gas		42230.25		
Propane Gas				
Synthetic Gas				
Hydrogen Gas	-			
Landfill Gas				
Other Gas - Name:				

	Steel Cathodically protected		Steel Cathodically unprotected							
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other	Total Miles
Transmission										
Onshore	.64	359.22	3.06	.02	0	0	7.04	0	0	369.98
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	.64	359.22	3.06	.02	0	o	7.04	О	О .	369.98
Gathering										-
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	О	0	0	О	0.	0	o .	0	0
Total Miles	.64	359.22	3.06	.02	0	0	7.04	0	0 .	369.98

<sup>1</sup>Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

	1.			 	
PART E – RESERVED	-	** *			-
174112 1120211125	* .		 	 	

For the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAstate pipeline facilities included within this OPID exist. Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than zero.

PART	s F a	nd G	
The d	lata re	eported in these PARTs applies to: (select only one)	
		Interstate pipelines/pipeline facilities	
	. ⊠.	Intrastate pipelines/pipeline facilities in the State of INDIANA (complete for each	ch State)

PART F - INTEGRITY INSPECTIONS CONDUCTED AND ACTIONS TAKEN BASED ON INSPECTION	
1. MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	
a. Corrosion or metal loss tools	
b. Dent or deformation tools	
c. Crack or long seam defect detection tools	
d. Any other internal inspection tools, specify other tools:	
1. Internal Inspection Tools - Other	
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)	
2. ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	
Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.	
<ul> <li>Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.</li> </ul>	
c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:	· ·
1. "Immediate repair conditions" [192.933(d)(1)]	 
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING	Spent to the second
a. Total mileage inspected by pressure testing in calendar year.	
b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment.	
c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT.	- <del></del>
<ul> <li>d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT.</li> </ul>	
repaired in calendar year WITHIN AN HCA SEGMENT.	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)  a. Total mileage inspected by each DA method in calendar year.	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)  a. Total mileage inspected by each DA method in calendar year.  1: ECDA	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)  a. Total mileage inspected by each DA method in calendar year.  1. ECDA  2. ICDA	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)  a. Total mileage inspected by each DA method in calendar year.  1. ECDA  2. ICDA  3. SCCDA  b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)  a. Total mileage inspected by each DA method in calendar year.  1. ECDA  2. ICDA  3. SCCDA  b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)  a. Total mileage inspected by each DA method in calendar year.  1. ECDA  2. ICDA  3. SCCDA  b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.  1. ECDA	
repaired in calendar year WITHIN AN HCA SEGMENT.  4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)  a. Total mileage inspected by each DA method in calendar year.  1: ECDA  2. ICDA  3. SCCDA  b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.  1. ECDA  2. ICDA	

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	Expires. 0/3 1/2020
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES	
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	
1.Other Inspection Techniques	
<ul> <li>Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.</li> </ul>	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933©]	
6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR	
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a)	4.
b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b)	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4)	
d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA SEGMENT:	
e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA SEGMENT:	*
PART G- MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Seg ONLY)	ment miles
Baseline assessment miles completed during the calendar year.	
b. Reassessment miles completed during the calendar year.	
c. Total assessment and reassessment miles completed during the calendar year.	¥ .

		PÆ	۱R.	Γs	F	an	d	G
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The data reported in these PARTs applies to: (select only one)

- Interstate pipelines/pipeline facilities
- Intrastate pipelines/pipeline facilities in the State of KENTUCKY (complete for each State)

104.3
104.3
59.72
50.5
YZ Inertia
318.82
_

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b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, 12 both within an HCA Segment and outside of an HCA Segment. c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of: 4 1. "Immediate repair conditions" [192.933(d)(1)] 3 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933(c)] 1 3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING a. Total mileage inspected by pressure testing in calendar year. n b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment. c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT. d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT. 4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods) a. Total mileage inspected by each DA method in calendar year. 1. ECDA 2. ICDA 3. SCCDA b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment. 1. ECDA 2. ICDA 3. SCCDA c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of: 1. "Immediate repair conditions" [192.933(d)(1)] 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933(c)] MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES a. Total mileage inspected by inspection techniques other than those listed above in calendar year. 1.Other Inspection Techniques b. Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment. c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of: 1. "Immediate repair conditions" [192.933(d)(1)] 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192,933(d)(3)] 4. Other "Scheduled conditions" [192.933©] 6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a) 318.82 b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA 12 Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b) c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 4 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA 0 SEGMENT: e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA 0 SEGMENT: PART G-MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Segment miles ONLY)

Case No. 2017-00482

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

Attachment to Response to Question No. 3
Form Approved
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Expires: 8/31/2020

a. Baseline assessment miles completed during the calendar year.	.97
b. Reassessment miles completed during the calendar year.	10.58
c. Total assessment and reassessment miles completed during the calendar year.	11.55

For the designated Commodity Group, complete PARTs H, I, J, K, L, M, P Q and R covering INTERstate pipelines and/or pipeline facilities for each State in which INTERstate systems exist within this OPID and again covering INTRAstate pipelines and/or pipeline facilities for each State in which INTRAstate systems exist within this OPID.

	, J, K, L, M, F									
•	eported in the				only one)					
PART H - N	ILES OF TR	ANSMISSI	ON PIPE B	Y NOMINAI	L PIPE SIZ	E (NPS)				
	NPS 4 or less	6	8	10	12	14	16	18	20	
	4.73	.62	3.31	4.98	0	0	0	0	0	
	22	24	26	28	30	32	34	36	38	
0 1	0	0	0	0	0	0	0	0	0	
Onshore	40	42	44	46	48	52	56	58 and over		
	0	0	0	0	0	0	0	0		
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;									
13.64		f Onshore Pipe	– Transmissi	on						
	NPS 4 or less	6	8	10	12	14	16	18	20	
	0	0	0	0	0	0	0	0	0	
	22	24	26	. 28	30	32	34	36	38	
	0	0	0	0	0	0	0	0	0	
Offshore	40	42	44	46	48	52	56	58 and over	wi .	
	0	0	0	0	0	0	0	0		
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;									
O <sub>.</sub>	Total Miles of	f Offshore Pipe	e – Transmissi	ion				<u> </u>		
PART I - M	ILES OF GAT	THERING P	PIPE BY NO	OMINAL PIF	PE SIZE (NI	PS)				
· · · · ·	NPS 4 or less	6	8	10	12	.14	16	18	20	
Onshore	0	0	0	0	0	0	0	0	0	
Type A	22 0	24 0	26 0	. 28	30	32	34	36	38	
J				0	0	0	0	1 0	0	

Attachment to Response to Question No. 3

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation Form Approved

for each day the violation continues up to a maximum of \$1,000,000 as provided in 40,000 as a p for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

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0 0 O n n O 0 n Additional Sizes and Miles (Size - Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 Total Miles of Onshore Type A Pipe - Gathering NPS 4 6 20 - 8 10 12 14 16 18 or less 0 0 0 0 0 0 0 0 0 24 22 26 28 30 32 34 36 38 0 0 0 0 0 0 0 0 **Onshore** Type B 58 and 40 42 44 46 48 52 56 over 0 0 0 0 ٥ 0 0 n Additional Sizes and Miles (Size - Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 Total Miles of Onshore Type B Pipe - Gathering NPS.4 10 18 20 6 R 14 16 12 or less n n 0 0 0 0 0 0 n 22 32 34 38 24 26. 28 30 36 0 0 0 0 0 0 0 Offshore 58 and :40 42 44 46 48 52 56 0 0 0 0 0 n 0 n Additional Sizes and Miles (Size - Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; . 0 Total Miles of Offshore Pipe - Gathering PART J - MILES OF PIPE BY DECADE INSTALLED Decade Pipe Unknown Pre-40 1940 - 1949 1950 - 1959 1960 - 1969 1970 - 1979 Installed **Transmission** Onshore .01 0 0 0 0 .05 Offshore .05 Subtotal Transmission .01 . Ô < 0 0 0 Gathering Onshore Type A 0 0 0 0 0 0 Onshore Type B 0 0 0 0 0 0 Offshore **Subtotal Gathering** 0 . 0 0 0 0 0 **Total Miles** .05 .01 0 0 0 140 AL **Decade Pipe** 2000 - 2009 1980 - 1989 1990 - 1999 2010 - 2019 **Total Miles** Installed **Transmission** Onshore 2.58 .41 3.58 7.01 13.64 Offshore Subtotal Transmission 7.01 2.58 .41 3.58 13.64 Gathering

Onshore Type A	0	0	0	0	0
Onshore Type B	0	0	0	0	. O
Offshore					
Subtotal Gathering	0	0	0	0.	0.2.2.3
Total Miles	2.58	.41	3.58	7.01	13.64

ONSHORE		Total Miles			
UNSTICKE	Class I	Class 2	Class 3	Class 4	
Steel pipe Less than 20% SMYS	5.29	0	.13	0	5.42
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	0	0	0	0	0
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	0	0	0	0	0
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	0	0	0	0	0
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	0	0	0	0	
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	0	0	0	0	0,
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	<b>0</b>
Steel pipe Greater than 80% SMYS	0	0	0	0	
Steel pipe Unknown percent of SMYS	2.1	0	.24	0	2.34
All Non-Steel pipe	5.01	· .88	0	0	5.89
Onshore Totals	12.4		37	0.	13.65
OFFSHORE	Class I				
Less than or equal to 50% SMYS	0				and the second of the second o
Greater than 50% SMYS but less than or equal to 72% SMYS	0				
Steel pipe Greater than 72% SMYS	0				
Steel Pipe Unknown percent of SMYS	0				
All non-steel pipe	0				
Offshore Total	0	Jang Taganan and Taganan a Taganan and Taganan and Tag	314		<b>0</b>
Total Miles	12.4		en e		13.65

	PIPE BY CLASS	

		Class L	Total	HCA Miles in the IMP		
	Class I	Class 2	Class 3	Class 4	Class Location Miles	Program
Transmission						
Onshore	12.4	.88	.37	0	13.65	0
Offshore	0	0	0	0	4, 0	
Subtotal Transmission	12.4	.88	.37	0	13.65	
Gathering						

Attachment to Response to Question No. 3

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation Form Approved Clyde for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

ation	Form Approved OMB No. 2137-0522	Clyde
	Expires: 8/31/2020	
1473		
and the		
	7	i

Total Miles	12.4	.88	.37	0	13.65	0
Subtotal Gathering	0	0	0	0	0	
Offshore	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	
Onshore Type A	0	0	0	0	0	

#### PART M - FAILURES, LEAKS, AND REPAIRS

#### PART M1 - ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

	Transmission Leaks, and Failures					Gathering Leaks		
	Leaks				Failures in	Onshore Leaks		Offshore Leaks
	Onsh	ore Leaks	Offsh	ore Leaks	HCA			
Cause	HCA	Non-HCA	HCA	Non-HCA	Segments	Type A	Type B	
External Corrosion	0	0	0	0	0	0	0	0
Internal Corrosion	0	0	0	0	0	0	0	0
Stress Corrosion Cracking	0	0	0	0	0	0	0	0
Manufacturing	0	0	0	0	0	0	0	0
Construction	0	0	0	0	0	0	0	0
Equipment	0	0	0	0	0	0	0	0
Incorrect Operations	0	0	0	0	0	0	0	0
Third Party Damage/Mecha	nical Da	amage						
Excavation Damage	0	0	0	0	0	0	0	0
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	0
Weather Related/Other Out	side Fo	rce						
Natural Force Damage (all)	0	0	0	0	0	0	0	0
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Transmission	0	Gathering
Transmission	0	Cathering

#### PART M3 - LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR

Transmission		Gathering			
	_	Onshore Type A			
Onshore	0	Onshore Type B			
ocs	0	ocs	0		
Subtotal Transmission	0	Subtotal Gathering	0		
Total		0			

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PART P - MILES OF	PIPE BY	MATERIAL	AND CORF	OSION PR	OTECTION				F 7 .	
	Steel Cathodically protected		Steel Cathodically unprotected							
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other <sup>2</sup>	Total Miles
Transmission										
Onshore	0	7.74	.01	0	0	0	5.89	0	0	13.64
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	0	7.74	.01	0	0	o	5.89	. 0	Ó	13.64
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0 .
Onshore Type B	0	0	0	0	0	0	0	0	0	0 '
Offshore	0	0	0	0	0	0	0	0	0	. 0
Subtotal Gathering	.0	О	0	. o	0	0	0	Ô	, <b>0</b>	0
Total Miles	0	7.74	.01	0	. 0	0.	5.89	0	j 0	13.64

<sup>&</sup>lt;sup>1</sup>Use of Composite pipe requires PHMSA Special Permit or waiver from a State <sup>2</sup>specify Other material(s):

Part Q - Gas Tr	art Q - Gas Transmission Miles by §192.619 MAOP Determination Method													
	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other <sup>1</sup> Total	Other Incomplete Records
Class 1 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA)	.88		11.52		0		0		0		0		0	
Class 2 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	.88		0		0		0		0		0		0	
Class 3 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 3 (not in HCA)	0	0	.36	.04	0	0	0	0	0	0	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	1.76	.0	11.88	.04	o 🤄	0 .	,0	0	0	0	0 1	0	0	,0.
Grand Total							13.64							
Sum of Total row	for all '	Incomple	ete Red	cords" colu	mns			.04						

<sup>1</sup>Specify Other method(s):

Class 1 (in HCA)	 Class 1 (not in HCA)	
Class 2 (in HCA)	 Class 2 (not in HCA)	
Class 3 (in HCA)	 Class 3 (not in HCA)	
Class 4 (in HCA)	Class 4 (not in HCA)	

Part R – Gas Transm	ission Miles b	y Pressure Test	(PT) Range an	d Internal Inspection			
	PT ≥ 1.	25 MAOP	1.25 MAO	P > PT ≥ 1.1 MAOP	PT < 1.1 or No PT		
Location	Miles Internal Inspection ABLE	Inspection Inspection		Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	
Class 1 in HCA	0	0	0	0	0	0	
Class 2 in HCA	0	0	0	0	0	0	
Class 3 in HCA	0	0	0	0	0	0	
Class 4 in HCA	0	0	0	0 .	0	0	
in HCA subTotal	. 0	o .	0	. 0	<b>0</b>	0	
Class 1 not in HCA	.02	8.89	0	0	0	3.49	
Class 2 not in HCA	0	0	0	0	0	.88	
Class 3 not in HCA	0	.13	0	0	0	.236	
Class 4 not in HCA	0	0	0	0	0	0	
not in HCA subTotal	.02	9.02	0	<b>0</b>	0	4.606	
Total	.02	9.02	.0	0	1 5 . <b>0</b> 7 7 7 7	4.606	
PT ≥ 1.25 MAOP Total			9.04	Total Miles Internal Ins	.02		
1.25 MAOP > PT ≥ 1.	1 MAOP Total		0	Total Miles Internal Inspection NOT ABLE 13.			
PT < 1.1 or No PT To	tal	-	4.606		Grand Total	13.646	
		Grand Total	13.646				

	2. 2. 2.			
PARTS	HI.	IKI	M P	Ω and R

The data reported in these PARTs applies to: (select only one)

INTRASTATE pipelines/pipeline facilities KENTUCKY

#### PART H - MILES OF TRANSMISSION PIPE BY NOMINAL PIPE SIZE (NPS)

	NPS 4 or less	.6	8	10	12	.14	16	18	20 -
	28.9	9.13	18.92	1.3	76	0	85.04	0	128.17
	22	<u>2</u> 4	<b>26</b>	28	30	32	34	36	38
Onshore	2.48	6.39	0	0	.03	0	0	0	0
	40	42	44	46	48	. 52	<b>56</b>	58 and over	
	0	o	0	o	o	О	o	o	
	Additional S	0 izes and Miles 0 - 0; 0 - 0; 0 -	(Size – Miles;)	:			0		
356.36	Total Miles o	of Onshore Pip	e – Transmissi	on					
	NPS 4 or less	6	8	10 3.	12	14	16	18	20

0

0

24

0

26

Offshore

36

0

38

.30

32

34

0

28

									es: 8/31/2020
	0	0	o	0	0	0	0	0	0
	40 ~	42	44	46	483	52	. 56.	58 and over	
	0	0	0	0	0	0	0	0	
	Additional S 0 - 0; 0 - 0; 0	izes and Miles ) - 0; 0 - 0; 0 - (	(Size – Miles;): 0; 0 - 0; 0 - 0; 0 -	0; 0 - 0;					
0	Total Miles	of Offshore Pip	e – Transmissio	1					
PART I - MI	LES OF GA	THERING F	PIPE BY NO	MINAL PIP	E SIZE (NI	PS)			
-	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
Onshore Type A	0	0	0	0	0	0	0	0	0
	40	42	1 44 A 3	46	48	52	56 58 ove	and er	
	0	0	0	0	0	0	0	0	
	Additional S	izes and Miles	(Size – Miles;):	0 - 0; 0 - 0; 0	- 0; 0 - 0; 0 - 0	); 0 - 0; 0 - 0; 0	0 - 0; 0 - 0;		
0		of Onshore Typ	e A Pipe – Gath	ering					
	NPS 4 or less	6	8	10	12	14-	16	18	,20
	0	0	0	0	0	0	0	0	0
	22	24	26	28.	30	<b>32</b>	34	36	38
Onshore Type B	0	0	0	0	0	0	0 58	and 0	0
туре Б	40	42	44	46	48	52	56 58 ove	er	
	0	0	0	0	0	0	0	0	<del></del>
	Additional S	izes and Miles	(Size – Miles;):	0 - 0; 0 - 0; 0	- 0; 0 - 0; 0 - 0	0; 0 - 0; 0 - 0; 0	0 - 0; 0 - 0;		
			e B Pipe – Gath	ering					
. <b>o</b> .	Total Miles	of Onshore Typ	1						66
0	NPS 4	6	-8	10 .	12	14	16	.18	20
0				10 . 0	1 <b>2</b> 0	14 0	16 0	,18 0	0
0	NPS 4 or less	6	8			"pa t			'
<u>Norwego godino</u>	NPS 4 or less	0	8	0	0	0	0 34 0	0 36 0	0 38 0
<u>Samuela de la composición dela composición de la composición de la composición dela composición dela composición dela composición de la c</u>	NPS 4 or less 0	6 0 24	0 26	0 28	0 30	0	0 34 0	0 36 0 and	0 38
<u>Norwego godino</u>	NPS 4 or less 0	6 0 24 0	0 26 0	0 28 0	0 30 0	0 32 0	0 34 0 56 58	0 36 0 and	0 38 0
0 Offshore	NPS 4 or less 0 22 0 40	6 0 24 0 42 0	8 0 26 0	0 28 0 46	0 30 0 48	0 32 0 52 0	0 34 0 58 ove	0 36 0 and	0 38 0

	oonandee up te a maxin			Expires: 8/31/2020			
Decade Pipe Installed	Unknown	Pre-40	1940 - 1949	1950 - 1959	1960 - 1969	1970 - 1979	
Transmission							
Onshore	4.46	0	0	83.56	41.97	68.82	
Offshore				-		-	
Subtotal Transmission	4.46	<b>0</b> ,		83.56	41.97	68.82	
Gathering							
Onshore Type A	0	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	0	
Offshore							
Subtotal Gathering	0	.0	0	0,	Ö	0	
Total Miles	4.46	0	0	83.56	41.97	68.82	
Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019		Total Miles	
Transmission							
Onshore	49.46	51.26	21.54	35.29		356.36	
Offshore		-	_				
Subtotal Transmission	49.46	51.26	21.54	35.29		356.36	
Gathering							
Onshore Type A	0	0	0	0		0	
Onshore Type B	0	0	0	0		0:	
Offshore	_		-				
Subtotal Gathering	0.02	0.7	0 . ,	0		0	
Total Miles	49.46	51.26	21.54	35.29		356.36	

PART K- MILES OF TRANSMISSION	PIPE BY SPECIFIED MINIMUM YIELD STRENGTH.
-	CLASS LOCATION

ONSHORE			Total Miles		
UNSHURE	Class I	Class 2	Class 3	Class 4	
Steel pipe Less than 20% SMYS	30.95	4.51	7.67	0	43.13
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	21.29	7.14	22.6	0	51.03
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	11.87	.7	27.36	0	39.93
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	42.86	15.91	6.83	0	65.6
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	0	0	0	0	0
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	0	0	0	0	0
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0
Steel pipe Unknown percent of SMYS	77.69	20.61	57.23	0	155.53
All Non-Steel pipe	1.15	0	0	0	1.15
Onshore Totals	185.81	48.87	121.69	0	356.37

Expires: 8/31/2020

		Expires. 8/3 1/2020
OFFSHORE	Class I	[2] [2] [2] [2] [2] [2] [2] [2] [2] [2]
Less than or equal to 50% SMYS	0	[발송: 호텔 : 그리고 하는 10 10 10 10 10 10 10 10 10 10 10 10 10
Greater than 50% SMYS but less than or equal to 72% SMYS	0	
Steel pipe Greater than 72% SMYS	0	
Steel Pipe Unknown percent of SMYS	0	
All non-steel pipe	0	
Offshore Total	0	
Total Miles	185.81	356:37

# PART L - MILES OF PIPE BY CLASS LOCATION

		Class L	ocation		Total	HCA Miles in the IMP
	Class I	Class 2	Class 3	Class 4	Class Location Miles	Program
Transmission						
Onshore	185.81	48.87	121.69	0	356.37	40.9
Offshore	0	0	0	0	0	
Subtotal Transmission	185.81	48.87	121.69	0	356.37	A Company of the Comp
Gathering						
Onshore Type A	0	0	0	0	, e.g.,,	
Onshore Type B	0	0	0	0	0	
Offshore	0	0	0	0	9 ( ° )	
Subtotal Gathering	0	0.5	0	0	0.	
Total Miles	185.81	48,87	121.69	0	356.37	40.9

# PART M - FAILURES, LEAKS, AND REPAIRS

# PART M1 - ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

		Transmissi	on Leaks,	and Failures			Gathering	g Leaks	
		Lea	ks		Failures in	Onshor	e Leaks	Offshore Leaks	
	Onsho	re Leaks	Offsh	ore Leaks	HCA				
Cause	HCA	Non-HCA	HCA	Non-HCA	Segments	Type A	Type B		
External Corrosion	0	1	0	0	0	0	0	0	
Internal Corrosion	0	0	0	0	_0	0	0	0	
Stress Corrosion Cracking	0	0	0	0	0	0	0	0	
Manufacturing	1	0	0	0	0	0	0	0	
Construction	0	0	0	0	0	0	0	0	
Equipment	1	0	0	0	0	0	0	0	
Incorrect Operations	0	2	0	0	0_	0	0	0	
Third Party Damage/Mecha	anical Da	mage				ra wa		The second secon	
Excavation Damage	0	0	0	0	0	0	0	0	
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0	
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	0	
Weather Related/Other Ou	tside Fo	rce:							
Natural Force Damage (all)	0	0	0	0	0	0	0	0	
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	1	0	0	0	0	0	0	
Other	0	0	0	0	0	0_	0	0	
Total	, 2	4	. 0	0	. 0	0	Ò	0	

Transmission	1	Gathering	0	
PART M3 - LEAKS ON FEDERAL	LAND OR	OCS REPAIRED OR SCHEDULED	FOR REPAIR	
Transmission		Gathering		
		Onshore Type A	0	
Onshore	1	Onshore Type B	0	
ocs	0	OCS	0	
Subtotal Transmission	1	Subtotal Gathering	0	
Total		1		

	Steel Cathodically protected		Steel Cathodically unprotected							
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other <sup>2</sup>	Total Miles
<b>Transmission</b>										
Onshore	.64	351.48	3.05	.02	0	0	1.15	0	0	356.34
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	.64	351.48	3.05	.02	0	0	1.15	0	0	356.34
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	0	0	0	0	0	0	0	0	0
Total Miles	.64	351.48	3.05	.02	0	0	1.15	0	0	356.34

<sup>&</sup>lt;sup>1</sup>Use of Composite pipe requires PHMSA Special Permit or waiver from a State <sup>2</sup>specify Other material(s):

Part Q - Gas Tr	ansmi	ssion N	liles k	y §192.6	19 M	AOP Det	ermination Method							
	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other¹ Total	Other Incomplete Records
Class 1 (in HCA)	.12	0	.01	0	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA)	50.11		96.64		0		0		38.92		0		0	
Class 2 (in HCA)	.15	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	11.64		25.58		0		0		11.49		0		0	
Class 3 (in HCA)	2.46	0	25.01	3.46	0	0	0	0	13.14	7.05	0	0_	0	0
Class 3 (not in HCA)	6.73	0	45.89	7.56	0	0	0	0	28.47	7.51	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	71.21	0	193.1 3	11.02	0	0	0	0	92.02	14.56	0	0	0	0
Grand Total		,		_				356.36						
Sum of Total row	for all "	Incomple	te Rec	ords" colu	mns			25.58	]					
<sup>1</sup> Specify Other me	thod(s)	:							•					
Class 1 (in HCA)							Class	Class 1 (not in HCA)						
Class 2 (in HCA)							Class	2 (not in HC	A)					_
Class 3 (in HCA)							Class	Class 3 (not in HCA)						
Class 4 (in HCA)							Class	4 (not in HC	A)					

	PT ≥ 1.:	25 MAOP	1.25 MAOI	P > PT ≥ 1.1 MAOP	PT < 1.1 or No PT		
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	
Class 1 in HCA	.12	0	0	0	.01	0	
Class 2 in HCA	.15	0	0	0	0	0	
Class 3 in HCA	21.23	.15	0	0	18.84	.38	
Class 4 in HCA	0	0	0	0	0	0	
in HCA subTotal	21.5	.15	. 0	0	18.85	.38	
Class 1 not in HCA	64.42	55.11	0	.33	42.86	22.96	
Class 2 not in HCA	16.09	9.36	Ů.	.36	12.91	9.98	
Class 3 not in HCA	40.49	2.4	0	0	36.75	1.45	
Class 4 not in HCA	0	0	0	0	0	0	
not in HCA subTotal	121	66.87	0	.69	92.52	34.39	
Total	142.5	67.02	0	.69	111.37	34.77	
PT ≥ 1.25 MAOP Tota	 ai		209.52	Total Miles Internal Ins	spection ABLE	253.87	
1.25 MAOP > PT ≥ 1.	1 MAOP Total		.69	Total Miles Internal Ins	102.48		
PT < 1.1 or No PT To	tal		146.14		356.35		
		Grand Total	356.35				

Expires: 8/31/2020

For the designated Commodity Group, complete PART N one time for all of the pipelines and/or pipeline facilities included within this OPID, and then also PART O if any gas transmission pipeline facilities included within this OPID have Part L HCA mile value greater than zero.

PART N - PREPARER SIGNATURE	: "	
William Norton		<b>(502)364-8439</b> Telephone Number
Preparer's Name(type or print)	 	relephone Hambel
Mechanical Engineer III		
Preparer's Title		
William.Norton@lge-ku.com		
Preparer's E-mail Address	 	

	<b>(502)627-4830</b> Telephone Number
Lonnie E Bellar	
Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)	
Chief Operating Officer	
Senior Executive Officer's title certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)	
lonnie.bellar@lge-ku.com	

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation Clyde OMB No. 2137-0522 for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122. Expires: 8/31/2020

U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

#### **ANNUAL REPORT FOR CALENDAR YEAR 2018** NATURAL OR OTHER GAS TRANSMISSION and **GATHERING SYSTEMS**

Initial Date Submitted	03/08/2019
Report Submission Type	INITIAL
Date Submitted	

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to be approximately 42 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at

TREE.//WWW.primod.dot.gov/pipeline/library/retime.		
PART A - OPERATOR INFORMATION	DOT USE ONLY	20190413 - 35749
OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID)	2. NAME OF OPERA	ATOR: AS & ELECTRIC CO
11824		
3. RESERVED	4. HEADQUARTER	S ADDRESS:
	220 W MAIN ST, PO Street Address	BOX 32010
	LOUISVILLE City	
	State: KY Zip Code:	40202
5. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY O	GROUP: (Select Comr	modity Group based on the predominant gas carried

and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)

**Natural Gas** 

- 6. RESERVED
- 7. FOR THE DESIGNATED "COMMODITY GROUP", THE PIPELINES AND/OR PIPELINE FACILITIES INCLUDED WITHIN THIS OPID ARE: (Select one or both)

INTERstate pipeline - List all of the States and OSC portions in which INTERstate pipelines and/or pipeline facilities included under this OPID exist. etc.

INTRAstate pipeline – List all of the States in which INTRAstate pipelines and or pipeline facilities included under this OPID exist. INDIANA, KENTUCKY etc.

8. RESERVED

Expires: 8/31/2020

For the designated Commodity Group, PARTs B and D will be calculated based on the data entered in Parts L and P respectively. Complete Part C one time for all pipelines and/or pipeline facilities – both INTERstate and INTRAstate - included within this OPID.

PART B - TRANSMISSION PIPELINE HCA MILES		
Number of HCA Miles		
Onshore	40.9	
Offshore	0	
Total Miles	40.9	

PART C - VOLUME TRANSPORTED IN TRANSMISSION PIPELINES (ONLY) IN MILLION SCF PER YEAR (excludes Transmission lines of Gas Distribution systems)		Check this box and do not complete PART C if this report only  includes gathering pipelines or transmission lines of gas distribution systems.			
		Onshore		Offshore	
Natural Gas		42230.25			
Propane Gas		·			
Synthetic Gas					
Hydrogen Gas					
Landfill Gas		<del> </del>			
Other Gas - Name:					

	Steel Cathodically protected		ally Steel Cathodically unprotected								
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other	Total Miles	
Transmission											
Onshore	.64	359.22	3.06	.02	0	0	7.04	0	0	369.98	
Offshore	0	0	0	0	0 '	0	0	0	0	0	
Subtotal Transmission	.64	- 359.22	3.06	.02	0 ~ ≎	0	7.04	0	<b>,</b>	369.98	
Gathering											
Onshore Type A	0	0	0	0	0	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	0	0	0	0	О.	
Offshore	0	0	0	0	Ö	0	0	0	0	О .	
Subtotal Gathering	0	0	0	. o	o	0	0	0	0	0	
Total Miles	.64	359.22	3.06	.02	0	0	7.04	. · · · O.	0	369.98	

<sup>1</sup>Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

1, 4, 4 × 4 × 1		14.41		2 T T T T T T T T T T T T T T T T T T T
PART E – RESERVED			الأوارية الرسي وأنبر إرسانية أراأ الماجات	
	<u> </u>			

Expires: 8/31/2020

For the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAstate pipeline facilities included within this OPID exist. Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than zero.

PARTs F and G	
The data reported in these PARTs applies to: (select only one)  □ Interstate pipelines/pipeline facilities  ☑ Intrastate pipelines/pipeline facilities in the State of INDIANA (complete for each State)	

. MILEA	GE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	
a.	Corrosion or metal loss tools	
b.	Dent or deformation tools	
C.	Crack or long seam defect detection tools	
d.	Any other internal inspection tools, specify other tools:	
	Internal Inspection Tools - Other	
е.	Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)	
2. ACTION	IS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	
	Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's iteria for excavation.	
b.	Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, oth within an HCA Segment and outside of an HCA Segment.	
c.	Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:	
	1. "Immediate repair conditions" [192.933(d)(1)]	
	2. "One-year conditions" [192.933(d)(2)]	
-	3. "Monitored conditions" [192.933(d)(3)]	
_	4. Other "Scheduled conditions" [192.933(c)]	
. MILEA	GE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING	" " " " " " " " " " " " " " " " " " "
a.	Total mileage inspected by pressure testing in calendar year.	
	Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA egment and outside of an HCA Segment.	-
	Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA EGMENT.	
	Total number of pressure test leaks (less than complete wall failure but including escape of test medium) paired in calendar year WITHIN AN HCA SEGMENT.	
. MILEAC	GE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)	
a.	Total mileage inspected by each DA method in calendar year.	
	1. ECDA	
	2. ICDA	
	3. SCCDA	
	Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's iteria, both within an HCA Segment and outside of an HCA Segment.	
	iteria, botti within an HCA Segment and outside of an HCA Segment.	
	1. ECDA	
	1. ECDA	
CI	1. ECDA 2. ICDA	

achment to F	Response to	Question No. 3
tion Form	Approved	Clyde
OMB N	o. 2137-0522	2

To do day the violation contained up to a maximum of \$1,000,000 as provided in 10 000 contain	Expires: 8/31/2020
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES	
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	
1.Other Inspection Techniques	
<ul> <li>Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.</li> </ul>	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933©]	
6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR	*
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a)	
b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b)	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4)	
d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA SEGMENT:	
e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA SEGMENT:	
PART G-MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA SeconDLY)	gment miles
a. Baseline assessment miles completed during the calendar year.	
b. Reassessment miles completed during the calendar year.	
c. Total assessment and reassessment miles completed during the calendar year.	

# PARTs F and G

The data reported in these PARTs applies to: (select only one)

- Interstate pipelines/pipeline facilities
- Intrastate pipelines/pipeline facilities in the State of KENTUCKY (complete for each State)

MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	
a. Corrosion or metal loss tools	104.3
b. Dent or deformation tools	104.3
c. Crack or long seam defect detection tools	59.72
d. Any other internal inspection tools, specify other tools:	50.5
1. Internal Inspection Tools - Other	XYZ Inertia
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d )	318.82
ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	

Clvde

Attachment to Response to Question No. 3 Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation Form Approved OMB No. 2137-0522 for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

Expires: 8/31/2020 b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, 12 both within an HCA Segment and outside of an HCA Segment. c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of: 4 3 1. "Immediate repair conditions" [192,933(d)(1)] 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933(c)] 1 MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING a. Total mileage inspected by pressure testing in calendar year. 0 b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment. c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT. d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT. 4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods) a. Total mileage inspected by each DA method in calendar year. 1. ECDA 2. ICDA 3. SCCDA b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment. 1. ECDA 2. ICDA 3. SCCDA c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of: 1. "Immediate repair conditions" [192.933(d)(1)] 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933(c)] 5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES Total mileage inspected by inspection techniques other than those listed above in calendar year. 1.Other Inspection Techniques b. Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment. c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of: 1. "Immediate repair conditions" [192.933(d)(1)] 2. "One-year conditions" [192.933(d)(2)] 3. "Monitored conditions" [192.933(d)(3)] 4. Other "Scheduled conditions" [192.933©] 6:TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a) 318.82 b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA 12 Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b) c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 4 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA 0 SEGMENT: e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA U PART G- MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Segment miles

ONLY)

Case No. 2017-00482

a. Baseline assess	ment miles completed during the calendar year.	.97
b. Reassessment r	niles completed during the calendar year.	10.58
c. Total assessmer	nt and reassessment miles completed during the calendar year.	11.55

For the designated Commodity Group, complete PARTs H, I, J, K, L, M, P Q and R covering INTERstate pipelines and/or pipeline facilities for each State in which INTERstate systems exist within this OPID and again covering INTRAstate pipelines and/or pipeline facilities for each State in which INTRAstate systems exist within this OPID.

The data re	ported in th	ese PARTs	s applies to	(select o	nly one)				
INTRASTA	TE pipelines	s/pipeline fa	acilities IND	IANA	· <u> </u>				•
PART H - N	IILES OF TR	RANSMISSI	ON PIPE BY	NOMINAL	PIPE SIZ	E (NPS)	*		
	NPS 4 or less	6	8.	10	12	14	լ 16	18	20
	4.73	.62	3.31	4.98	0	0	0	0	0
	- 22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
Onshore	40	42	44	46	48	52	.56	58 and over	
	0	0	0	0	0	0	0	0	
	0 - 0; 0 - 0; (	0 - 0; 0 - 0; 0 -	(Size Miles;): 0; 0 - 0; 0 - 0; 0	-0;0-0;					
13.64	Total Miles of NPS 4	of Onshore Pip	e – Transmissio			F -	-		-
	or less	6	8 .	10	12	14	16	18	- 20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	О	0	0	0	0	0	0
Offshore	40	42	44	46	48	52	56	58 and over	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$
	0	0	0	0	0	0	0	0	
	Additional Si 0 - 0; 0 - 0; 0	izes and Miles ) - 0; 0 - 0; 0 - (	(Size – Miles;): 0; 0 - 0; 0 - 0; 0	- 0; 0 - 0;					
				_	_				
0	Total Miles o	of Offshore Pip	e – Transmissio	on					
0	Total Miles o	of Offshore Pip	e – Transmissio	on 					
	Total Miles o		* * * * * *		E SIZE (N	PS)			
			* * * * * *		<b>E SIZE (N</b>	<b>PS)</b>	16	18	20
PART I - M	ILES OF GA	THERING I	PIPE BY NO	MINAL PIP		1.	16 0	18	20 0
	NPS 4 or less	THERING I	PIPE BY NO	MINAL PIP	12	14	·	18	20

		ontinues up to a maxi	mum of \$1,000,00	0 as provided ir	1 49 USC 60	0122.	\$100,000 for e		OV	/IB No. 2137-0522 pires: 8/31/2020
	0	0	0	0	0	0	0	0		
	Additiona	al Sizes and Miles	(Size – Miles;):	0 - 0; 0 - 0; 0	- 0; 0 - 0; (	0 - 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;		_	
. 0	Total Mile	es of Onshore Typ	e A Pipe – Gath	ering	-					
	NPS 4		8	10	12	14	16	1	18	20
	, or ress	0	0	ō	0	0	0		0	0
	22	24	26	28	30	32	34	•	36	.38
Onshore	0	0	0	0	0	0	0	_	0	0
Type B	40	42	44	46	48	52	56	58 an		
	0	0	0	0	0	0	0	0		
	Additiona	al Sizes and Miles	(Size – Miles;):	0 - 0; 0 - 0; 0	- 0; 0 - 0; (	0 - 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;			
0	Total Mil	es of Onshore Typ	e B Pipe – Gath	nering						
	NPS 4 or less	. K	. 8	10	12	14	16	ć.	18	20
	0	0	0	0_	0	0	0		0	0
	22	24	26	28	30	32	34	-	36	38
Offshore	0	0	0	0	0	0	0		0	0
	40	42	44	46	48	52	56	58 an	d .	
0		0	0	0	0	0	0	0		
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;									
	Additiona	al Sizes and Miles	(Size – Miles;):	0 - 0; 0 - 0; 0	- 0; 0 - 0; 0	0 - 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;			
	+			0 - 0; 0 - 0; 0	- 0; 0 - 0; (	0 - 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;	-		
0	+	al Sizes and Miles		0 - 0; 0 - 0; 0	- 0; 0 - 0; (	0 - 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;			
0	+			0 - 0; 0 - 0; 0	- 0; 0 - 0; 0	0 - 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;			
	Total Mil		e – Gathering		- 0; 0 - 0; 0	0 - 0; 0 - 0; 0 - 0	; 0 - 0; 0 - 0;			
PART J – I	Total Mil	es of Offshore Pip	e – Gathering	LLED						4070 4070
PART J – I Decade Pipe Installed	Total Mil MILES OF	es of Offshore Pip	e – Gathering			0 - 0; 0 - 0; 0 - 0 1950 - 1959	1960 - 19			1970 - 1979
PART J – I Decade Pipe Installed Transmiss	Total Mil MILES OF	es of Offshore Pip PIPE BY DEC	e – Gathering  CADE INSTA	<b>LLED</b> 1940 - 1		1950 - 1959	1960 - 19			1970 - 1979
PART J – I Decade Pipe Installed Transmiss Onshore	Total Mil MILES OF	es of Offshore Pip	e – Gathering	LLED						1970 - 1979 .05
PART J – I Decade Pipe Installed Transmiss Onshore Offshore	Total Mil	es of Offshore Pipe PIPE BY DEC Unknown .01	e – Gathering  CADE INSTA  Pre-40	<b>LLED</b> 1940 - 1		1950 - 1959	1960 - 10 0		i tang	.05
PART J – I Decade Pipe Installed Transmiss Onshore Offshore Subtotal Transmiss	Total Mil	es of Offshore Pip PIPE BY DEC	e – Gathering  CADE INSTA	<b>LLED</b> 1940 - 1		1950 - 1959	1960 - 19		i tang	,
PART J – I Decade Pipe Installed Transmiss Onshore Offshore Subtotal Tran	Total Mil	es of Offshore Pipe PIPE BY DEC Unknown .01	Pre-40	1940 - 1 0		1950 - 1959 0	1960 - 19 0		i tang	.05
PART J – I Decade PipelInstalled Transmiss Onshore Offshore Subtotal Tran Gathering Onshore T	Total Mil  MILES OF  e  sion  nsmission  ype A	es of Offshore Pipe PIPE BY DEC Unknown .01 .01	Pre-40	1940 - 1 0 0		1950 - 1959 0 0	1960 - 18 0 0		i tang	.05
PART J – I Decade Pipe Installed Transmiss Onshore Offshore Subtotal Tran Gathering Onshore T	Total Mil  MILES OF  e  sion  nsmission  ype A	es of Offshore Pipe PIPE BY DEC Unknown .01	Pre-40	1940 - 1 0		1950 - 1959 0	1960 - 19 0		i tang	.05
PART J – I Decade Pipe Installed Transmiss Onshore Offshore Subtotal Tran Gathering Onshore T Onshore T Offshore	Total Mil  MILES OF  e  sion  nsmission  ype A  ype B	PIPE BY DEC Unknown .01 .01 .01	Pre-40  0  0  0	1940 - 1 0 0	1949	1950 - 1959 0 0 0	1960 - 18 0 0 0		i tang	.05 .05 .00
PART J – I Decade Pip Installed Transmiss Onshore Offshore Subtotal Tran Gathering Onshore T Onshore T Offshore Subtotal	Total Mil  MILES OF  e  sion  nsmission  ype A	es of Offshore Pipe PIPE BY DEC Unknown .01 .01 .01 .0	Pre-40  0  0  0  0	1940 - 1 0 0	1949	1950 - 1959 0 0 0	1960 - 18 0 0 0	969		.05 .05 .00
PART J – I Decade Pipe Installed Transmiss Onshore Offshore Subtotal Tran Gathering Onshore T Onshore T Offshore Subtotal Total Miles Decade Pipe	Total Mil  MILES OF  e  sion  nsmission  ype A  ype B  Gathering	PIPE BY DEC Unknown .01 .01 .01	Pre-40  0  0  0	1940 - 1 0 0 0	1949	1950 - 1959 0 0 0	1960 - 18 0 0 0	969	i tang	.05
PART J – I Decade Pipe Installed Transmiss Onshore Offshore Subtotal Tran Gathering Onshore T Onshore T Offshore Subtotal Total Miles Decade Pipe Installed	Total Mil  MILES OF  e  sion  ype A  ype B  Gathering  e	es of Offshore Pipe PIPE BY DEC Unknown  .01  .01  .01  .0  .0  .0 .0	Pre-40  O  O  O  O	1940 - 1 0 0 0	1949	1950 - 1959 0 0 0 0	1960 - 18 0 0 0	969		.05 0 0 0
PART J – I Decade Pipe Installed Transmiss Onshore Offshore Subtotal Trat Gathering Onshore T Onshore T Offshore Subtotal Total Miles Decade Pipe Installed	Total Mil  MILES OF  e  sion  ype A  ype B  Gathering  e	es of Offshore Pipe PIPE BY DEC Unknown  .01  .01  .01  .0  .0  .0 .0	Pre-40  O  O  O  O	1940 - 1 0 0 0	1949	1950 - 1959 0 0 0 0	1960 - 18 0 0 0	969		.05  .05  .05  .0  .0  .05  .05  Total Miles
PART J – I Decade Pip Installed Transmiss Onshore Offshore Subtotal Tran Gathering Onshore T Onshore T Offshore Subtotal Total Miles Decade Pip Installed Transmiss	Total Mil  MILES OF  e  sion  ype A  ype B  Gathering  e	es of Offshore Pipe PIPE BY DEC Unknown  .01  .01  .01  .01  .01  .01  .01  .0	e – Gathering  CADE INSTA  Pre-40  0  0  0  0  1990 - 1999	1940 - 1 0 0 0 0 0 2000 - 2	1949	1950 - 1959 0 0 0 0 0 2010 - 2019	1960 - 18 0 0 0	969		.05 .05 .05 .0 .0 .05 .05 .05 .05 .05 .0

					 -	Aprico. Orc	7 172020	
Onshore Type A	0	0	0	. 0			0 ;	e C
Onshore Type B	0	0	0	0		- 1- 1	0.	
Offshore				-	1			£ .
Subtotal Gathering	<u>,</u> 0 ·-	0	0	0		3. * (	0	
Total Miles	2.58	.41	3.58	7.01		્રે <u>ી</u> 13	.64	***

ONGUODE		CLASS L	OCATION	_	Total Miles
ONSHORE -	Class I	Class 2	Class 3	Class 4	
Steel pipe Less than 20% SMYS	5.29	0	.13	0	5.42
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	0	0	0	0	0.
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	0	0	0	0	0
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	0	0	0	0	0
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	0	0	0	0	0.
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	0	0	0	0	0
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0
Steel pipe Unknown percent of SMYS	2.1	0	.24	0	2.34
All Non-Steel pipe	5.01	.88	0	0	5.89
Onshore Totals	12.4	.88	.37	0	13.65
OFFSHORE	Class I				
Less than or equal to 50% SMYS	0				
Greater than 50% SMYS but less than or equal to 72% SMYS	0				
Steel pipe Greater than 72% SMYS	0				
Steel Pipe Unknown percent of SMYS	0_				
All non-steel pipe	0				
Offshore Total	0		are a		0
Total Miles	12,4		• • • • • • • • • • • • • • • • • • • •		13.65

PART L - MILES OF PIP	PE BY CLASS	LOCATION		ة - الأبر حو		
		Class I	_ocation	-	Total	HCA Miles in the IMP
	Class !	Class 2	Class 3	Class 4	Class Location Miles	Program
Transmission						
Onshore	12.4	.88	.37	0	13.65	0
Offshore	0	0	0	0	0	
Subtotal Transmission	12.4	.88	.37	0	13.65	
Gathering						

Total Miles	12.4	.88	.37	0	13.65	0
Subtotal Gathering	0	0	0	0	0	
Offshore	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	
Onshore Type A	0	0	0	0	0	

# PART M - FAILURES, LEAKS, AND REPAIRS

#### PART M1 - ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

		Transmission	on Leaks	, and Failures			Gathering	Leaks	
		Lea	ks		Failures in	Onshor	e Leaks	Offshore Leaks	
[	Onsh	ore Leaks	Offsh	ore Leaks	HCA Segments				
Cause	HCA	Non-HCA	HCA	Non-HCA		Type A	Type B		
External Corrosion	0	0	0	0	0	0	0	0	
Internal Corrosion	0	0	0	0	0	0	0	0	
Stress Corrosion Cracking	0	0	0	0	0	0	0	0	
Manufacturing	0	0	0	0	0	0	0	0	
Construction	0	0	0	0	0	0	0	0	
Equipment	0	0	0	0	0	0	0	0	
Incorrect Operations	0	0	0	0	0	0	0	0	
Third Party Damage/Mecha	nical Da	amage							
Excavation Damage	0	0	0	0	0	0	0	0	
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0	
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	0	
Weather Related/Other Out	side Fo	rce							
Natural Force Damage (all)	0	0	0	0	0	0	0	0	
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	

## PART M2 - KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR

iransmission	0	Gathering

#### PART M3 - LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR

Transmission		Gathering				
		Onshore Type A				
Onshore	0	Onshore Type B				
OCS	0	ocs	0			
Subtotal Transmission	0	Subtotal Gathering	0			
Total		0				

		athodically tected		thodically tected						
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other <sup>2</sup>	Total Miles
Transmission										
Onshore	0	7.74	.01	0	0	0	5.89	0	0	13.64
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	0	7.74	.01	0	0	0	5.89	0	0	13.64
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	. О
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	. 0	0	0	0	, Ø.	0 ;	.0	0	o	0
Total Miles	. 0	7.74	.01	. 0	Ô	0	5.89	0	0	13.64

<sup>1</sup>Use of Composite pipe requires PHMSA Special Permit or waiver from a State <sup>2</sup>specify Other material(s):

Part Q - Gas Tr	ansm	ission N	/liles l	oy §192.6	19 M	AOP Det	ermin	ation Me	thod					
	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other <sup>1</sup> Total	Other Incomplete Records
Class 1 (in HCA)	0	0	0	0	0	0	0	Ò	0	0	0	0	0	0
Class 1 (not in HCA)	.88		11.52		0		0		0		0		0	
Class 2 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	.88		0		0		0		0		0		0	
Class 3 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 3 (not in HCA)	0	0	.36	.04	0	0	0	0	0	0	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	, 0
Class 4 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	1.76	0	11.88	.04	0	0	0	0	. 0	0	0 ,	.0	0 `	0
Grand Total						•		13.64						-
Sum of Total row	for all '	'Incomple	te Red	cords" colu	mns	_		.04						

<sup>1</sup>Specify Other method(s):

Class 1 (in HCA)	Class 1 (not in HCA)
Class 2 (in HCA)	Class 2 (not in HCA)
Class 3 (in HCA)	Class 3 (not in HCA)
Class 4 (in HCA)	Class 4 (not in HCA)

		,					
	PT ≥ 1.:	25 MAOP	1.25 MAOF	P > PT ≥ 1.1 MAOP	PT < 1.1 or No PT		
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	
Class 1 in HCA	0	0	0	0	0	0	
Class 2 in HCA	0	0	0	0	0	0	
Class 3 in HCA	0	0	0	0	0	0	
Class 4 in HCA	0	0	. 0	0	0	0	
in HCA subTotal	0 :	0	.0	O	0	0	
Class 1 not in HCA	.02	8.89	0	0	0	3.49	
Class 2 not in HCA	0	0	0	0	0	.88	
Class 3 not in HCA	0	.13	0	0	0	.236	
Class 4 not in HCA	0	0	0	0	0	0	
not in HCA subTotal	.02	9.02	0	0	0	4.606	
Total	.02	9.02	0	0	0	4.606	
PT ≥ 1.25 MAOP Tota	al		9.04	Total Miles Internal In	spection ABLE	.02	
1.25 MAOP > PT ≥ 1.	1 MAOP Total		0'	Total Miles Internal In	spection NOT ABLE	13.626	
PT < 1.1 or No PT To	tal		4.606		Grand Total	13.646	
	- <u> </u>	Grand Total	13.646				

# PARTs H, I, J, K, L, M, P, Q, and R

The data reported in these PARTs applies to: (select only one)

INTRASTATE pipelines/pipeline facilities KENTUCKY

## PART H - MILES OF TRANSMISSION PIPE BY NOMINAL PIPE SIZE (NPS)

	NPS 4 or less	6	8	10	12		. 16	18	20
	28.9	9.13	18.92	1.3	76	0	85.04	0	128.17
	22	24	26	28	30	32	34	36	38,
01	2.48	6.39	0	0	.03	0	0	0	0
Onshore	40	42	44	46	48	52	56	58 and over	4
	-0	0	0	0	0	0	0	0	

356.36	Total Miles of Onshore Pipe - Transmission
--------	--

7 000.00	Total Willes	or originate rup	c — Hallollilook	JII					
	NPS 4 or less	6	8	.10	12	14	16	18	20
Offshore	0	0	0	0	0	0 .	0	0	0
	22	24	26	28	30	32	34	36	38

	_	1							
	0	0	o	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Si 0 - 0; 0 - 0; 0	izes and Miles ) - 0; 0 - 0; 0 - (	(Size Miles;): 0; 0 - 0; 0 - 0; 0	- 0; 0 - 0;					
0	Total Miles o	of Offshore Pipe	e – Transmissi	on					
PART I - MIL	ES OF GA	THERING F	PIPE BY NO	MINAL PIF		PS)			
	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
Inshore Type A	0	0	0	0	0	0	0	0	0
ype A	40	42	44	46	48	52	56 58	and er	
	0	0	0	0	0	0	0	0	
	Additional S	izes and Miles	(Size – Miles;)	: 0 - 0; 0 - 0; 0	- 0; 0 - 0; 0 - 0	0; 0 - 0; 0 - 0; 0	) - 0; 0 - 0;		
0	Total Miles	of Onshore Typ	e A Pipe – Ga	thering					_
	NPS 4 or less	6	8	10	12	- 14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
nshore	0	0	0	0	0	0	0	0	0
уре В	40	42	44	46	48	52	56 58 ove	and er	· · · · · · · · · · · · · · · · · · ·
	0	0	0	0	0	0	0	0	
	Additional S	izes and Miles	(Size – Miles;)	: 0 - 0; 0 - 0; 0	-0;0-0;0-0	); 0 - 0; 0 - 0; 0	0 - 0; 0 - 0;		_
0	Total Miles o	of Onshore Typ	e B Pipe – Ga	thering					
	NPS 4	6	8	10	12	14	16	18	20
	or less	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34,	36	38
)ffshore	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56 58 ove	and er	
	0	0	0	0	0	0	0	0	
	Additional S	izes and Miles	(Size – Miles;)	: 0 - 0; 0 - 0; 0	- 0; 0 - 0; 0 - 0	); 0 - 0; 0 - 0; 0	) - 0; 0 - 0;		
		-			·				

						Expires: 8/31/2020
Decade Pipe Installed	Unknown	Pre-40	1940 - 1949	1950 - 1959	1960 - 1969	1970 - 1979
Transmission						
Onshore	4.46	0	0	83.56	41.97	68.82
Offshore						
Subtotal Transmission	4.46	0	0	83.56	41.97	68.82
Gathering						
Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore						
Subtotal Gathering	. 0	0	0 .	0	. 0 ,	0
Total Miles	4.46	, o	0	83.56	41.97	68.82
Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019		Total Miles
Transmission						
Onshore	49.46	51.26	21.54	35.29		356.36
Offshore						
Subtotal Transmission	49.46	51.26	21.54	35.29		356.36
Gathering						
Onshore Type A	0	0	0	0		0
Onshore Type B	0	0	0	0		0
Offshore						
Subtotal Gathering	0	0	0	. 0		0
Total Miles	49.46	51.26	21.54	35.29		356.36

ONGLIODE		Total Miles			
ONSHORE	Class I	Class 2	Class 3	Class 4	<u>]</u>
Steel pipe Less than 20% SMYS	30.95	4.51	7.67	0	43.13
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	21.29	7.14	22.6	0	51.03
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	11.87	.7	27.36	0	39.93
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	42.86	15.91	6.83	0	65.6
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	0	0	0	0	Ó
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	0	0	0	0	0
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0 %
Steel pipe Unknown percent of SMYS	77.69	20.61	57.23	0	155.53
All Non-Steel pipe	1.15	0	0	0	1.15
Onshore Totals	185.81	48.87	121 69	0	356 37

		Expires: 0/3 1/2020
OFFSHORE	Class I	
Less than or equal to 50% SMYS	0	
Greater than 50% SMYS but less than or equal to 72% SMYS	0	
Steel pipe Greater than 72% SMYS	0	
Steel Pipe Unknown percent of SMYS	0	
All non-steel pipe	0	
Offshore Total	0	0
Total Miles	185.81	356.37

## PART L - MILES OF PIPE BY CLASS LOCATION

		Class L	ocation		Total	HCA Miles in the IMP
	Class I	Class 2	Class 3	Class 4	Class Location Miles	Program
Transmission						
Onshore	185.81	48.87	121.69	0	356.37	40.9
Offshore	0	0	0	0	0	
Subtotal Transmission	185.81	48.87	121.69	0	356.37	
Gathering						
Onshore Type A	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	
Offshore	0	0	0	0	0	
Subtotal Gathering	0	0	0	0	0	
Total Miles	185.81	48.87	121.69	0	356.37	40.9

# PART M - FAILURES, LEAKS, AND REPAIRS

## PART M1 - ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

		Transmissi	on Leaks	and Failures	Gathering Leaks				
		Lea	ks		Failures in HCA Segments	Onshor	e Leaks	Offshore Leaks	
[	Onsh	ore Leaks	Offsh	ore Leaks					
Cause	HCA	Non-HCA	HCA	Non-HCA		Type A	Type B		
External Corrosion	0	1	0	0	0	0	0	0	
Internal Corrosion	0	0	0	0	0	0	0	0	
Stress Corrosion Cracking	0	0	0	0	0	0	0	0	
Manufacturing	1	0	0	0	0	0	0	0	
Construction	0	0	0	0	0	0	0	0	
Equipment	1	0	0	0	0	0	0	0	
Incorrect Operations	0	2	0	0	0	0	0	0	
Third Party Damage/Mecha	nical D	amage							
Excavation Damage	0	0	0	0	0	0	0	0	
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0	
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	0	
Weather Related/Other Out	side Fo	rce							
Natural Force Damage (all)	0	0	0	0	0	0	0	0	
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	1	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	0	
Total	2	4	0	0	0	0	0	0	

Transmission	1	Gathering	0	
PART M3 - LEAKS ON FEDERAL	LAND OR	OCS REPAIRED OR SCHEDULED	FOR REPAIR	
Transmission		Gathering		
		Onshore Type A	0	
Onshore	1	Onshore Type B	0	
ocs	0	ocs	0	
Subtotal Transmission	1	Subtotal Gathering	0	
Total				

	Steel Cathodically protected		Steel Cathodically unprotected			·				
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite <sup>1</sup>	Other <sup>2</sup>	Total Miles
Transmission										
Onshore	.64	351.48	3.05	.02	0	0	1.15	0	0	356.34
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	.64	351.48	3.05	.02	0	0	1.15	0	0	356.34
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	0	0	0	0	0	0	0	0	0
Total Miles	.64	351.48	3.05	.02	0	0	1.15	0	0	356.34

<sup>&</sup>lt;sup>1</sup>Use of Composite pipe requires PHMSA Special Permit or waiver from a State <sup>2</sup>specify Other material(s):

	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other <sup>1</sup> Total	Other Incomplete Records
Class 1 (in HCA)	.12	0	.01	0	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA)	50.11		96.64		0		0		38.92	:	0		0	
Class 2 (in HCA)	.15	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	11.64		25.58		0		0		11.49		0		0	
Class 3 (in HCA)	2.46	0	25.01	3.46	0	0	0	0	13.14	7.05	0	0	0	0
Class 3 (not in HCA)	6.73	0	45.89	7.56	0	0	0	0	28.47	7.51	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	71.21	0	193.1 3.	11.02	0	0	0	0	92.02	14.56	0	0	0	Ö
Grand Total		<u> </u>						356.36		· · · ·				
Sum of Total row for all "Incomplete Records" columns							25.58	1						

<sup>1</sup> Specify Ot	her metho	od(s	):
-------------------------	-----------	------	----

Class 1 (in HCA)	Class 1 (not in HCA)
Class 2 (in HCA)	Class 2 (not in HCA)
Class 3 (in HCA)	Class 3 (not in HCA)
Class 4 (in HCA)	Class 4 (not in HCA)

Part R – Gas Transm	ission Miles b	y Pressure Test	(PT) Range an	d Internal Inspection				
	PT ≥ 1.	25 MAOP	1.25 MAO	P > PT ≥ 1.1 MAOP	PT < 1.1 or No PT			
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE		
Class 1 in HCA	.12	0	0	0	.01	0		
Class 2 in HCA	.15	0	0	0	0	0		
Class 3 in HCA	21.23	.15	0	0	18.84	.38		
Class 4 in HCA	0	0	0	0 ,	0	0		
in HCA subTotal	21.5	.15	0	, ; <b>0</b>	18.85	.38		
Class 1 not in HCA	64.42	55.11	0	.33	42.86	22.96		
Class 2 not in HCA	16.09	9.36	0	.36	12.91	9.98		
Class 3 not in HCA	40.49	2.4	0	0	36.75	1.45		
Class 4 not in HCA	0	0	0	0	0	0		
not in HCA subTotal	121 `	66.87	0	.69	92.52	34.39		
Total	142.5	67.02	0	.69	111.37	34.77		
PT ≥ 1.25 MAOP Tota	al .	<del> </del>	209:52	Total Miles Internal In	253.87			
1.25 MAOP > PT ≥ 1.	1 MAOP Total		.69	Total Miles Internal In	102.48			
PT < 1.1 or No PT To	tal		146.14		Grand Total			
		Grand Total	356.35					

Case No. 2017-00482

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.

Attachment to Response to Question No. 3
Form Approved OMB No. 2137-0522
OMB No. 2137-0522 Expires: 8/31/2020

For the designated Commodity Group, complete PART N one time for all of the pipelines and/or pipeline facilities included within this OPID, and then also PART O if any gas transmission pipeline facilities included within this OPID have Part L HCA mile value greater than zero.

PART N - PREPARER SIGNATURE	
William Norton	(502)364-8439 Telephone Number
Preparer's Name(type or print)	
Mechanical Engineer III	
Preparer's Title	
William.Norton@lge-ku.com	
Preparer's E-mail Address	<del></del>
PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M	1)
	(502)627-4830 Telephone Number
Lonnie E Bellar	respirate rumber
Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required 49 U.S.C. 60109(f)	i by
Chief Operating Officer	
Senior Executive Officer's title certifying the information in PARTs B, F, G, and M as required b 49 U.S.C. 60109(f)	y

lonnie.bellar@lge-ku.com

Senior Executive Officer's E-mail Address

# Response to Commission Staff's First Request for Information Dated April 9, 2019

## Case No. 2017-00482

# Question No. 4

# Responding Witness: Peter Clyde

- Q-4. Refer to the 2018 Annual Report, Part F, Section 2, pages 4-5, in which LG&E reported that it inspected 318.82 miles of transmission pipeline in 2017 using ILI tools and that based on these inspections, LG&E identified, excavated and repaired 12 anomalous conditions, four of which were located in an HCA.
  - a. State how many miles of the Calvary Pipeline were inspected in 2018 by each of the ILI tools listed in Part F, Section 2, of the 2018 Annual Report.
  - b. How many of the 12 anomalous conditions that were excavated were located on the Calvary Pipeline?
  - c. How many of the four anomalous conditions located within an HCA were on the Calvary Pipeline?
  - d. With respect to each anomalous condition on the Calvary Pipeline in an HCA segment:
    - (1) Describe each condition.
    - (2) Categorize each condition as an immediate repair condition, one-year condition, monitored condition, or other scheduled condition as defined in 49 C.F.R. § 192.933 {d).
    - (3) State what actions LG&E has taken and plans to take to address the conditions.

A-4.

a. The mileage of pipeline inspected in 2018 is listed in Part F, Section 1, of the Company's 2018 Annual Report. The mileage indicated in Section 1 includes approximately 53 miles of metal loss tool inspections on the Calvary pipeline and approximately 53 miles of dent or deformation tool inspections on the Calvary pipeline. However, the 53 miles of dent or deformation tool inspections were mistakenly reported on the 2018 annual report, when those inspections were actually completed in 2017 and reported on the 2017 annual

report as noted in the response to Question No. 2 above. A supplemental 2018 annual report will be filed correcting the error.

- b. One of the 12 anomalous conditions that was excavated was on the Calvary pipeline.
- c. One of the four anomalous conditions located within an HCA was on the Calvary pipeline.
- d.
- (1) The one anomalous condition reported on the annual report located within HCA on the Calvary pipeline was a <3% dent on the bottom 1/3 of the pipe.
- (2) The dent was reported as a scheduled condition on the 2018 annual report. It did not meet the criteria of an immediate, 1 year, or monitored condition as defined in 49 C.F.R. § 192.933(d). Upon further review, however, the dent also did not meet the definition of a scheduled condition as defined in 49 CFR § 192.933(c). While LG&E voluntarily chose to schedule the dent for repair, because the inline inspection vendor believed the dent might have prevented a successful metal loss tool inspection of the pipeline, the dent should not have been reported as a scheduled condition on the annual report. The matter will be corrected on the supplemental 2018 annual report LG&E files.
- (3) The cylinder of pipe which contained the dent was cut out of the pipeline and replaced. This work was completed on July 6, 2018.

# Response to Commission Staff's First Request for Information Dated April 9, 2019

#### Case No. 2017-00482

# Question No. 5

# Responding Witness: Peter Clyde

- Q-5. Refer to the 2018 Annual Report, Part G, pages 5-6, in which LG&E reported that in the calendar year 2018, it completed an integrity reassessment of 10.58 miles of transmission pipeline located in an HCA. Does this total include all segments of the Calvary Pipeline located in an HCA?
- A-5. All segments of the Calvary pipeline located in HCA were assessed. However, 0.97 miles of the Calvary pipeline in HCA was not included in the 10.58 miles reassessed. This is because the 0.97 miles was not a HCA during the 2010 ILI and therefore the 2018 assessment was a baseline assessment rather than a reassessment.

# Response to Commission Staff's First Request for Information Dated April 9, 2019

## Case No. 2017-00482

## **Question No. 6**

# Responding Witness: Peter Clyde

- Q-6. For each successful ILI tool run of the Calvary Pipeline, provide the summary or final report of the ILI tool vendor.
- A-6. The tools detected two dents with metal loss, six dents >2% affecting a girth weld, and various monitored and other conditions which do not raise pipeline integrity concerns. This summary combines the results of the dent/deformation tool and metal loss tool as the data from both tools is used to categorize a particular anomaly.

The two dents with metal loss are outside of HCA. Of the six dents >2% affecting a girth weld, five are outside of HCA and one is within HCA. LG&E plans to excavate and repair or replace both dents with metal loss and all six dents >2% affecting a girth weld this year. These responses far exceed federal pipeline safety regulations and are being done as part of LG&E's commitment to pipeline safety.

# Response to Commission Staff's First Request for Information Dated April 9, 2019

Case No. 2017-00482

# Question No. 7

# **Responding Witness: Peter Clyde**

- Q-7. State whether LG&E requests that a hearing be held in this matter or that the matter stand submitted for a decision on the record. If LG&E requests a hearing, identify the issues it wishes to raise at the hearing, the witness or witnesses it intends to present, and an explanation of why a hearing on these issues is necessary.
- A-7. LG&E does not request a hearing be held on the matter. As a result, LG&E requests that the matter be submitted for a decision on the record.