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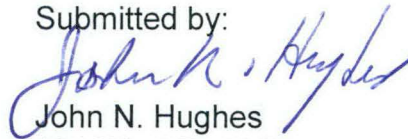
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PUBLIC SERVICE
COMMISSION

**KENTUCKY FRONTIER GAS, LLC
ALLEGED VIOLATION OF UNDERGROUND
FACILITY DAMAGE PREVENTION ACT
CASE NO. 2019-00280, et al.**

**RESPONSE TO COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION**

Submitted by:



John N. Hughes

124 West Todd St.

Frankfort, KY 40601

502 227 7270

Attorney for Kentucky Frontier Gas, LLC

DECLARATION OF STEVEN SHUTE

I, Steven Shute, am a Member of Kentucky Frontier Gas, LLC, the Applicant in the referenced matter. I have read the responses and I have full authority to sign this declaration. The facts set forth therein are true and correct to the best of my knowledge, information and belief. Pursuant to KRS 523.020-040, I certify under penalty of false swearing that the foregoing is true and correct.

Dated this 4th day of November, 2019.

A handwritten signature in black ink, appearing to read 'S. Shute', is written over a horizontal line. The signature is stylized and somewhat cursive.

Steven Shute, Member,
Kentucky Frontier Gas, LLC

1. Refer to Kentucky Frontier's response to question 1 d. of Staff's Initial Request for Information. Provide the most recent system maps from the current GIS system for all of Kentucky Frontier's GIS mapped facilities. The maps should include roads, Kentucky Frontier distribution pipelines and meters, Kentucky Frontier farm taps, any Kentucky Frontier gas wells that are part of the distribution system, and city gates.

Witness: Shute

Pursuant to the ruling of the Chairman at the conference of October 31, 2019 and discussions with staff, KFG will supply Shapefiles for this purpose. The road sections of these maps will be included in the base map layers of any GIS program you may choose to view these files. KFG will not supply paper copies of these maps as they are logistically challenging to produce, expensive, and there would be no purpose in this case.

2. Are the GIS-mapped pipelines the same as what is submitted to the 811 System? What is the buffer (in feet) that is placed around the pipelines to generate an 811 ticket? Is this buffer adequate to take into account service lines?

Witness: Shute

These maps are the same ones that are submitted to the 811 system. The 811 site automatically sets a 200 ft buffer for any GIS line layers. For other areas we do not have fully mapped (Phelps, Cliffview), we have created polygon layers that would cover the entirety of the area of the location of any pipe we may have in the ground. This buffer is sufficient to cover a majority of our existing service lines.

3. What is Kentucky Frontier's plan for updating its GIS data? Is it part of Kentucky Frontier's standard operating procedures to notify the 811 system of changes to its system?

Witness: Shute

Whenever possible, KFG employees that have new relevant information for the GIS system, we try to add to it or edit as much as possible. With any significant location change (may not be relevant to replaced pipe) we update the 811 annually. This is first year we have submitted GIS data to the 811 system, we have only submitted once in January for line layers and once in August for the remaining polygon layers. It will be our policy going forward to update these on a regular annual basis. Before we did this, the 811 system would notify us within a very generalized polygon that covered most of Eastern Kentucky. Our new system is much more efficient.

4. Does Kentucky Frontier share the general location of its pipelines with local water, sewer, and electric companies in the area, so they are aware that they need to call 811?

Witness: Shute

As to my knowledge we do not share this information except for with the 811 system. It would be helpful if these companies were required or more willing to be members of 811. It is not in the practices of KFG to supply confidential information with random parties.

5. Has Kentucky Frontier mapped the 811 incidents in the GIS system from 2016 to the present? If so, please provide a map illustrating where the incidents occurred and reference them with an 811 ID tag. Are there any clusters of incidents that suggest a particular problem that can be resolved to prevent further occurrences?

Witness: Shute

No.