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**OVERNIGHT DELIVERY**

January 28, 2010

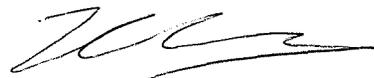
Jeff R. Devouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
PO Box 615  
Frankfort, Kentucky 40602

RE: **Atmos Gathering Company's Responses to  
KPSC Initial Data Request  
Case No. 2009-00417**

Dear Mr. Devouen:

I enclose herewith an original, plus ten (10) copies, of Atmos Gathering Company's Responses to the Kentucky Public Service Commission's Initial Data Request in Case No. 2009-00417 for filing in your office. Thanks.

Very truly yours,



Mark R. Hutchinson

# **ATMOS GATHERING COMPANY**

**KENTUCKY**

**Public Service Commission**

**CASE NO. 2009-00417**

**RESPONSES TO FIRST DATA REQUEST**

**OF**

**COMMISSION STAFF**

ATMOS GATHERING COMPANY  
CASE NO. 2009-00417  
Commission Staff Data Request  
DR Item 1  
Witness: Larry Moore  
Title: Vice President Atmos-Power Systems

DATA REQUEST 1:

Atmos states that it is seeking to install reinforced thermoplastic pipe ("RTP") into regulated high-pressure gas-gathering service as part of the Shrewsbury/Park City Kentucky project involving around 23 miles of gathering pipelines. Confirm that Atmos is seeking the requested waiver for this project only and does not intend the waiver to apply to other lines within the Commonwealth.

**RESPONSE:**

Atmos Gathering Company (AGC) is seeking this waiver for installation of approximately 23 miles of gas gathering line named Shrewsbury/Park City project and does not intend the waiver to apply to any other lines within the Commonwealth.

ATMOS GATHERING COMPANY  
CASE NO. 2009-00417  
Commission Staff Data Request  
DR Item 2  
Witness: Larry Moore  
Title: Vice President Atmos-Power Systems

**DATA REQUEST 2:**

Explain whether Atmos has received approval to install RTP in any other state and, if yes, provide copies of such approvals.

**RESPONSE:**

AGC has not received approval or installed reinforced thermoplastic pipe (RTP) in any other state.

ATMOS GATHERING COMPANY  
CASE NO. 2009-00417  
Commission Staff Data Request  
DR Item 3  
Witness: Larry Moore  
Title: Vice President Atmos-Power Systems

DATA REQUEST 3:

Atmos states that valve stations will be located a maximum of two miles apart, but that Flexpipe System does not recommend squeeze-off to stop gas flow.

- (a) Explain whether this means the system can only be shut off at the valve stations.
- (b) Explain who will be responsible for shutoff.
- (c) State whether a Regional Service Technician would be required to repair the system.
- (d) If a Regional Service Technician is required to make repairs, state who is responsible for contacting the Regional Service Technician and the estimated response time.
- (e) Explain whether there have been any incidents involving this material on any system owned or operated by Atmos.

**RESPONSE:** AGC will install isolation/control valves at a maximum spacing of two (2) miles.

- (a) Yes. The system will only be able to shut off by utilizing the above described isolation/control valves. The RTP manufacturer (Flexpipe) does

not recommend "squeeze-off" due to the possibility of pipe damage.

(b) AGC field operating personnel will be responsible for shutoff.

(c) AGC field operators will perform any repairs on the system as needed. In regard to "response time" for any pipeline repair or maintenance activities, it is important to bear in mind this is a gathering line. Therefore, it will not serve any residential or commercial customers and system shutdown for any length of time will not result in an interruption of service.

(d) Not applicable – see (c) above.

(e) None – see (2) above.

ATMOS GATHERING COMPANY  
CASE NO. 2009-00417  
Commission Staff Data Request  
DR Item 4 (a) and (b)  
Witness: Larry Moore  
Title: Vice President Atmos-Power Systems

**DATA REQUEST 4:**

Refer to the "Reliability" section of the Application. Atmos states that "only trace amounts of gas were detected at the surface end fitting vent holes, as expected."

- (a) Explain what is meant by "as expected."
  
- (b) State what Atmos believes is an acceptable level of leakage on such high-pressure lines and explain how Atmos determined that acceptability level.

**RESPONSE:**

The "Reliability" section of the application is not the experience of AGC, but the results of field testing by a third party independent emissions testing company. These tests were performed for Flexpipe on 174,000 feet of Flexpipe natural gas gathering lines and 140 Flexpipe couplings.

- (a) The "gas detected at the surface end fitting vent holes, as expected" refers to gas that vents through the coupling holes as designed. Natural gas permeates all plastic pipe. Flexpipe has a reinforcement layer of fiberglass between two (2) layers of plastic. Any gas that accumulates in the fiberglass layer (due to

permeation) vents through the hole provided in the coupling.

The amount of vented natural gas was measured by the emissions testing company. They were unable to measure a Methane concentration higher than 2 parts per million (ppm) at any point along the pipe including over the locations with buried couplings.

- (b) The natural gas industry measures for natural gas leakage in all gas service areas. Unacceptable natural gas readings are 5ppm or greater at which time corrective action must be taken to identify the source of the elevated readings and take the appropriate action to safely resolve the problem.

ATMOS GATHERING COMPANY  
CASE NO. 2009-00417  
Commission Staff Data Request  
DR Item 5  
Witness: Larry Moore  
Title: Vice President Atmos-Power Systems

DATA REQUEST 5.

Provide a larger, more readable copy of the maps attached to the application. If Atmos wishes, it may also provide a copy of the maps electronically on CD-ROM.

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**RESPONSE:**

CD-ROM disk containing the project maps is attached.