

June 26, 2015

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

RE: Case No. 2015-00084

Dear Mr. Derouen:

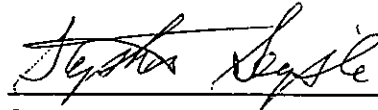
Columbia Gas of Kentucky, Inc. ("Columbia") hereby submits for filing an original and ten (10) copies of its responses to Staff's Initial Request for Information in the above case. If you have questions, please don't hesitate to contact me at 614-460-4648 or [sseiple@nisource.com](mailto:sseiple@nisource.com).

Sincerely,

A handwritten signature in cursive script that reads "Stephen B. Seiple".

Stephen B. Seiple  
Assistant General Counsel

I hereby certify that each response to Staff's First Request for Information is true and accurate to the best of my knowledge and belief, formed after a reasonable inquiry.



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Stephen B. Seiple  
Assistant General Counsel

Attorney for  
**COLUMBIA GAS OF KENTUCKY, INC.**

COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION  
DATED JUNE 12, 2015

1. Refer to Columbia's application, the last sentence of paragraph 3, which states, "After reviewing this rule in depth, Columbia interprets the Commission rule to require a recording pressure gauge downstream of *every distinct pressure system*." (Emphasis in original). Describe what is meant by "distinct pressure system" as used in this sentence.

**Response:**

The phrase *every distinct pressure system* was used to ensure there was no ambiguity with the word "system" used in a general sense. A distinct pressure system is equivalent to a distribution system.

COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION  
DATED JUNE 12, 2015

2. Refer to Columbia's application, the last sentence of paragraph 4, which states, "Columbia meets the federal standard, and has recording pressure gauges for each distribution system having two or more district stations."
  - a. Based on the wording in this sentence, how many "distribution systems" does Columbia have?
  - b. Describe each "distribution system" by location and identify the number of district pressure-regulating stations supplying each location.

**Response:**

- a. Columbia's infrastructure currently includes 314 distribution systems. A redacted spreadsheet is attached and the unredacted spreadsheet has been filed under seal with the Commission.
  - b. A redacted spreadsheet is attached and the unredacted spreadsheet has been filed under seal with the Commission.
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| System   |             | MAOP   | District      |
|----------|-------------|--------|---------------|
| Number   | System Name | (PSIG) | Station Count |
| 32001001 |             | LP     | 6             |
| 32001002 |             | 30     | 1             |
| 32001003 |             | 50     | 2             |
| 32001004 |             | 200    | 1             |
| 32001005 |             | 60     | 1             |
| 32001006 |             | 18     | 1             |
| 32001007 |             | LP     | 1             |
| 32001008 |             | 15     | 1             |
| 32001013 |             | 16     | 1             |
| 32001015 |             | 6      | 1             |
| 32001017 |             | 12     | 1             |
| 32001019 |             | 10     | 1             |
| 32001021 |             | 36     | 1             |
| 32001023 |             | 335    | 1             |
| 32001024 |             | LP     | 1             |
| 32003001 |             | LP     | 3             |
| 32003002 |             | 30     | 1             |
| 32004001 |             | 10     | 1             |
| 32005001 |             | 10     | 1             |
| 32005002 |             | 45     | 1             |
| 32005003 |             | 10     | 1             |
| 32007001 |             | 8      | 1             |
| 32008001 |             | 10     | 1             |
| 32009001 |             | 10     | 1             |
| 32010001 |             | LP     | 3             |
| 32010002 |             | 35     | 1             |
| 32010003 |             | LP     | 6             |
| 32010004 |             | 8      | 1             |
| 32010005 |             | 5      | 1             |
| 32010006 |             | 10     | 1             |
| 32010007 |             | 7      | 1             |
| 32010008 |             | 45     | 3             |
| 32010009 |             | 8      | 1             |
| 32010010 |             | 90     | 1             |
| 32010011 |             | LP     | 13            |
| 32010012 |             | 60     | 2             |
| 32010017 |             | 7      | 1             |
| 32010021 |             | 18     | 1             |
| 32010022 |             | 10     | 1             |
| 32010023 |             | 45     | 2             |
| 32010025 |             | 60     | 1             |
| 32010026 |             | 200    | 1             |

|          |  |     |    |
|----------|--|-----|----|
| 32010027 |  | 8   | 2  |
| 32010028 |  | 60  | 1  |
| 32010029 |  | 8   | 1  |
| 32010030 |  | 14  | 2  |
| 32010031 |  | 10  | 1  |
| 32010032 |  | LP  | 1  |
| 32010033 |  | 14  | 2  |
| 32010034 |  | 60  | 1  |
| 32010035 |  | 88  | 1  |
| 32010037 |  | 60  | 1  |
| 32010038 |  | 14  | 1  |
| 32010039 |  | 60  | 1  |
| 32010040 |  | 8   | 1  |
| 32010041 |  | 60  | 2  |
| 32010042 |  | 8   | 1  |
| 32010043 |  | 10  | 1  |
| 32010045 |  | 5   | 1  |
| 32010046 |  | 10  | 1  |
| 32010047 |  | LP  | 4  |
| 32010048 |  | 42  | 2  |
| 32010051 |  | 60  | 1  |
| 32010053 |  | 9   | 1  |
| 32010055 |  | 15  | 1  |
| 32010056 |  | LP  | 5  |
| 32010057 |  | LP  | 4  |
| 32010058 |  | 14  | 1  |
| 32010059 |  | 60  | 1  |
| 32010060 |  | LP  | 11 |
| 32010061 |  | 40  | 1  |
| 32010062 |  | 40  | 2  |
| 32010063 |  | 10  | 1  |
| 32010064 |  | 20  | 1  |
| 32010067 |  | 15  | 1  |
| 32010068 |  | 12  | 1  |
| 32010069 |  | 24  | 1  |
| 32010070 |  | 60  | 1  |
| 32010071 |  | 58  | 1  |
| 32010072 |  | 20  | 1  |
| 32010073 |  | 28  | 2  |
| 32010074 |  | LP  | 1  |
| 32010075 |  | 20  | 4  |
| 32010076 |  | 60  | 1  |
| 32010077 |  | 40  | 1  |
| 32010078 |  | 175 | 1  |
| 32010079 |  | 14  | 1  |

|          |  |     |   |
|----------|--|-----|---|
| 32010080 |  | 60  | 1 |
| 32010081 |  | LP  | 2 |
| 32010082 |  | 60  | 1 |
| 32010083 |  | 8   | 1 |
| 32010085 |  | 7   | 1 |
| 32010086 |  | 9   | 1 |
| 32010087 |  | 250 | 3 |
| 32010088 |  | 15  | 3 |
| 32010090 |  | 60  | 1 |
| 32010091 |  | 8   | 1 |
| 32010092 |  | 60  | 1 |
| 32010093 |  | LP  | 1 |
| 32010095 |  | 6   | 1 |
| 32010096 |  | 60  | 1 |
| 32010098 |  | 20  | 1 |
| 32010099 |  | 8   | 1 |
| 32010101 |  | 40  | 1 |
| 32010102 |  | 19  | 2 |
| 32010103 |  | LP  | 1 |
| 32010104 |  | LP  | 1 |
| 32010106 |  | LP  | 1 |
| 32010107 |  | 8   | 1 |
| 32010108 |  | 10  | 1 |
| 32010109 |  | 10  | 1 |
| 32010111 |  | 60  | 2 |
| 32010113 |  | 10  | 1 |
| 32010115 |  | 10  | 1 |
| 32010117 |  | 10  | 1 |
| 32010119 |  | 60  | 1 |
| 32010120 |  | 60  | 4 |
| 32010122 |  | 40  | 1 |
| 32010123 |  | 60  | 1 |
| 32010125 |  | 60  | 1 |
| 32010126 |  | 60  | 1 |
| 32010127 |  | 10  | 1 |
| 32010128 |  | 60  | 1 |
| 32010129 |  | LP  | 4 |
| 32010130 |  | 60  | 1 |
| 32010131 |  | 45  | 9 |
| 32010132 |  | 20  | 4 |
| 32010133 |  | 35  | 1 |
| 32010134 |  | 40  | 1 |
| 32010135 |  | 35  | 1 |
| 32010136 |  | 60  | 1 |
| 32010137 |  | 40  | 1 |

|          |  |     |    |
|----------|--|-----|----|
| 32010138 |  | 160 | 1  |
| 32010139 |  | 60  | 1  |
| 32010140 |  | 10  | 1  |
| 32010141 |  | LP  | 2  |
| 32010142 |  | LP  | 1  |
| 32010143 |  | LP  | 41 |
| 32010144 |  | 60  | 1  |
| 32010145 |  | 60  | 2  |
| 32010147 |  | 60  | 1  |
| 32010148 |  | 60  | 1  |
| 32010150 |  | 60  | 1  |
| 32010152 |  | 60  | 1  |
| 32010153 |  | 60  | 1  |
| 32010154 |  | 30  | 1  |
| 32010155 |  | 60  | 1  |
| 32010156 |  | 60  | 1  |
| 32010158 |  | 60  | 2  |
| 32010159 |  | 60  | 1  |
| 32010160 |  | 50  | 1  |
| 32010161 |  | 60  | 1  |
| 32010162 |  | 60  | 1  |
| 32010163 |  | 60  | 1  |
| 32010164 |  | 60  | 1  |
| 32010165 |  | 5   | 1  |
| 32010166 |  | LP  | 1  |
| 32010167 |  | LP  | 4  |
| 32010168 |  | 35  | 1  |
| 32010170 |  | 720 | 1  |
| 32010171 |  | 10  | 1  |
| 32010172 |  | 10  | 1  |
| 32010173 |  | LP  | 11 |
| 32010174 |  | 10  | 1  |
| 32010175 |  | 10  | 1  |
| 32010176 |  | 20  | 1  |
| 32010177 |  | 50  | 2  |
| 32010178 |  | 200 | 2  |
| 32010179 |  | 60  | 1  |
| 32010180 |  | 60  | 1  |
| 32010181 |  | 60  | 1  |
| 32010182 |  | 60  | 1  |
| 32010183 |  | 60  | 1  |
| 32010184 |  | 60  | 1  |
| 32010185 |  | 100 | 1  |
| 32010186 |  | 60  | 1  |
| 32010187 |  | LP  | 11 |



|          |  |     |   |
|----------|--|-----|---|
| 32010188 |  | 99  | 1 |
| 32010189 |  | LP  | 1 |
| 32010190 |  | LP  | 2 |
| 32010191 |  | LP  | 1 |
| 32010192 |  | 15  | 1 |
| 32010193 |  | LP  | 1 |
| 32010194 |  | LP  | 1 |
| 32011001 |  | 50  | 1 |
| 32012001 |  | LP  | 1 |
| 32012002 |  | 90  | 1 |
| 32012003 |  | 42  | 2 |
| 32013001 |  | 10  | 2 |
| 32014002 |  | 10  | 1 |
| 32014003 |  | 55  | 1 |
| 32014004 |  | 10  | 1 |
| 32014005 |  | 10  | 1 |
| 32014006 |  | 20  | 1 |
| 32014007 |  | 373 | 1 |
| 32015001 |  | LP  | 3 |
| 32015002 |  | 10  | 1 |
| 32015003 |  | 17  | 1 |
| 32016001 |  | 20  | 1 |
| 32017001 |  | 10  | 1 |
| 32018001 |  | 10  | 1 |
| 32019001 |  | 41  | 1 |
| 32020001 |  | 7   | 1 |
| 32021001 |  | LP  | 1 |
| 32024001 |  | 8   | 1 |
| 32024002 |  | 40  | 1 |
| 32025001 |  | 5   | 1 |
| 32026001 |  | 10  | 1 |
| 32026002 |  | LP  | 2 |
| 32027001 |  | 10  | 2 |
| 32028001 |  | LP  | 2 |
| 32029001 |  | 10  | 1 |
| 32030001 |  | 10  | 1 |
| 32031001 |  | 10  | 1 |
| 32032001 |  | 10  | 1 |
| 32036001 |  | 10  | 1 |
| 32037001 |  | 10  | 1 |
| 32038001 |  | 60  | 1 |
| 32039001 |  | 60  | 1 |
| 32040001 |  | 8   | 1 |
| 32041001 |  | 8   | 1 |
| 32042001 |  | 50  | 1 |

|          |  |     |    |
|----------|--|-----|----|
| 32043001 |  | 9   | 1  |
| 32044001 |  | 11  | 1  |
| 32045001 |  | 10  | 1  |
| 32046001 |  | 20  | 1  |
| 32046002 |  | 72  | 1  |
| 32047001 |  | 10  | 1  |
| 32047002 |  | 99  | 1  |
| 32047003 |  | 5   | 1  |
| 32047004 |  | 60  | 1  |
| 32048001 |  | 75  | 1  |
| 32048002 |  | 52  | 2  |
| 32048003 |  | 8   | 4  |
| 32048004 |  | LP  | 1  |
| 32048005 |  | LP  | 2  |
| 32048006 |  | LP  | 7  |
| 32048007 |  | 8   | 1  |
| 32048008 |  | 8   | 2  |
| 32048011 |  | LP  | 6  |
| 32048012 |  | 8   | 1  |
| 32049001 |  | 37  | 1  |
| 32049002 |  | 8   | 1  |
| 32049003 |  | 20  | 1  |
| 32049004 |  | 20  | 1  |
| 32049005 |  | 60  | 1  |
| 32049006 |  | 47  | 2  |
| 32049007 |  | LP  | 7  |
| 32049008 |  | 200 | 1  |
| 32049009 |  | 8   | 1  |
| 32049010 |  | 60  | 1  |
| 32051001 |  | LP  | 26 |
| 32051003 |  | 48  | 7  |
| 32051004 |  | 10  | 2  |
| 32051005 |  | 28  | 1  |
| 32051006 |  | 10  | 8  |
| 32051007 |  | LP  | 2  |
| 32051008 |  | 60  | 1  |
| 32051009 |  | LP  | 2  |
| 32051010 |  | LP  | 1  |
| 32051011 |  | 145 | 1  |
| 32051012 |  | 7   | 1  |
| 32051013 |  | 5   | 1  |
| 32051014 |  | LP  | 1  |
| 32051015 |  | 10  | 2  |
| 32051016 |  | 10  | 1  |
| 32051017 |  | LP  | 2  |

|          |  |      |   |
|----------|--|------|---|
| 32051018 |  | 132  | 7 |
| 32051019 |  | 720  | 1 |
| 32051020 |  | 60   | 1 |
| 32051021 |  | 60   | 1 |
| 32051022 |  | 85   | 7 |
| 32051023 |  | 60   | 1 |
| 32051024 |  | LP   | 1 |
| 32051025 |  | 60   | 1 |
| 32051026 |  | LP   | 1 |
| 32051027 |  | LP   | 1 |
| 32051028 |  | 25   | 2 |
| 32051029 |  | 60   | 1 |
| 32051030 |  | 373  | 0 |
| 32051031 |  | LP   | 1 |
| 32055001 |  | 60   | 1 |
| 32055002 |  | 919  | 1 |
| 32056001 |  | 10   | 1 |
| 32058001 |  | 60   | 1 |
| 32058002 |  | 720  | 1 |
| 32064001 |  | 60   | 1 |
| 32065001 |  | 60   | 1 |
| 32069001 |  | 60   | 2 |
| 32069002 |  | 10   | 1 |
| 32069003 |  | 175  | 1 |
| 32070001 |  | 60   | 1 |
| 32070002 |  | 153  | 1 |
| 32006001 |  | 16   | 1 |
| 32023001 |  | 10   | 1 |
| 32033001 |  | 10   | 1 |
| 32034001 |  | 10   | 1 |
| 32035001 |  | 13   | 1 |
| 32050001 |  | 10   | 1 |
| 32050002 |  | 1000 | 0 |
| 32053001 |  | 10   | 1 |
| 32054001 |  | 60   | 1 |
| 32054002 |  | 60   | 1 |
| 32054003 |  | 373  | 0 |
| 32057001 |  | 60   | 1 |
| 32060001 |  | 360  | 0 |
| 32061001 |  | 460  | 0 |
| 32063001 |  | 373  | 0 |
| 32066001 |  | 466  | 0 |
| 32066002 |  | 60   | 1 |
| 32068001 |  | 15   | 1 |
| 32071001 |  | 5    | 1 |

32072001



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**COLUMBIA GAS OF KENTUCKY, INC.**  
**RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION**  
**DATED JUNE 12, 2015**

3. Refer to Columbia's application, the first sentence of paragraph 5, which states that "Columbia's infrastructure includes 312 distinct pressure systems controlled by approximately 550 district regulator stations."

- a. Does Columbia consider each of these 312 distinct pressure systems to be separate distribution systems?
- b. Describe what is meant by the word "controlled" in this sentence.

**Response:**

Since the filing of the application, Columbia's infrastructure has changed due to construction to include 314 distinct pressure systems and 548 district regulator stations.

- a. Yes, Columbia considers each of the 314 distinct pressure systems a separate distribution system.

- b. The word "controlled" means the reduction in pressure that occurs at a district regulator station.

KY PSC Case No. 2015-00084  
Response to Staff's Data Request Set One No. 04  
Respondent: Gary E. Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.**  
**RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION**  
**DATED JUNE 12, 2015**

4. Refer to Columbia's application, the second sentence in paragraph 5, which states that "[t]o comply with the Commission's rule, Columbia would be required to add 166 additional recording pressure gauges to district regulator stations." How many recording pressure gauges does Columbia currently have on its entire system?

**Response:**

Columbia currently has 157 chart recording gauges, 38 electronic recording gauges, 29 chart recording gauges at customer facilities, and 3 end of line gauges.

KY PSC Case No. 2015-00084  
Response to Staff's Data Request Set One No. 05  
Respondent: Gary E. Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.**  
**RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION**  
**DATED JUNE 12, 2015**

5. Identify each location for which a deviation from 807 KAR 5:022, Section 14(22)(a), is sought.

**Response:**

The redacted spreadsheet is attached and the unredacted spreadsheet has been filed under seal with the Commission.

Note: Changes in Columbia's infrastructure since the application was filed and optimum identification of monitoring points has reduced the number of gauges sought in the deviation to 159 locations.



| Station Number | System Number | Number Customers | Pipe Length (ft) | Pipe Size (in) | System Name | Normal Operating Pressure | MAOP       | Premise ID | Station Location |
|----------------|---------------|------------------|------------------|----------------|-------------|---------------------------|------------|------------|------------------|
| 1018           | 32010191      | 103              | 20,018           | 4              |             | LP                        | 10.5" w.c. | 0200120    |                  |
| 1026           | 32010193      | 217              | 14,488           | 2,3,4,6,8      |             | LP                        | 10.5" w.c. | 0200137    |                  |
| 1027           | 32010134      | 148              | 10,170           | 2,3,4,6        |             | 40                        | 35 psig    | 0200125    |                  |
| 1029           | 32010130      | 45               | 6,120            | 2,3,4          |             | 60                        | 47 psig    | 0200095    |                  |
| 1031           | 32010194      | 397              | 19,251           | 3,4,6,8,10,12  |             | LP                        | 10.5" w.c. | 0200139    |                  |
| 1052           | 32010096      | 139              | 16,787           | 2,3,4,6        |             | 60                        | 50 psig    | 0200469    |                  |
| 1061           | 32010040      | 202              | 10,579           | 2,3,4,6        |             | 8                         | 7 psig     | 0200084    |                  |
| 1061           | 32010028      | 26               | 11,780           | 2,3,4,6        |             | 60                        | 42 psig    | 0200084    |                  |
| 1066           | 32010133      | 279              | 29,445           | 2,3,4,6        |             | 35                        | 30 psig    | 0200109    |                  |
| 1067           | 32010099      | 164              | 19,292           | 2,3,4          |             | 8                         | 7 psig     | 0200062    |                  |
| 1068           | 32010122      | 15               | 4,989            | 2,4,6          |             | 40                        | 25 psig    | 0200107    |                  |
| 1072           | 32010135      | 45               | 7,429            | 2,4,6          |             | 35                        | 30 psig    | 0200086    |                  |
| 1094           | 32010101      | 2346             | 127,658          | 2,3,4,6,8      |             | 40                        | 32 psig    | 0209577    |                  |
| 1097           | 32010086      | 51               | 7,508            | 2,4,6          |             | 9                         | 6 psig     | 0200071    |                  |
| 1100           | 32010038      | 337              | 39,932           | 2,3,4,6        |             | 14                        | 10 psig    | 0200129    |                  |
| 1112           | 32010091      | 34               | 5,466            | 2,3,4,6,8      |             | 8                         | 7 psig     | 0200478    |                  |
| 1113           | 32010108      | 131              | 22,644           | 2,3,4,6        |             | 10                        | 8 psig     | 0200360    |                  |
| 1115           | 32010107      | 44               | 14,070           | 2,3            |             | 8                         | 5 psig     | 0200362    |                  |
| 1118           | 32010109      | 14               | 3,144            | 6              |             | 10                        | 8 psig     | 0200074    |                  |
| 1119           | 32010127      | 214              | 16,151           | 2,3,4,6,8      |             | 10                        | 8 psig     | 0200073    |                  |
| 1122           | 32010085      | 42               | 5,590            | 2,3,4          |             | 7                         | 5.5 psig   | 0200467    |                  |
| 1129           | 32010042      | 5                | 2,523            | 2,3            |             | 8                         | 6 psig     | 0200369    |                  |
| 1135           | 32046001      | 118              | 42,344           | 2,3,4          |             | 20                        | 17 psig    | 0200078    |                  |
| 1136           | 32010079      | 6                | 4,457            | 2,3,4          |             | 14                        | 8 psig     | 0200374    |                  |
| 1142           | 32010092      | 161              | 13,032           | 2,3,4          |             | 60                        | 35 psig    | 0200378    |                  |
| 1145           | 32010034      | 27               | 15,306           | 2,3,4          |             | 60                        | 25 psig    | 0200380    |                  |
| 1146           | 32057001      | 9                | 1,375            | 2              |             | 60                        | 11 psig    | 0200381    |                  |
| 1147           | 32010076      | 9                | 669              | 2              |             | 60                        | 8.5 psig   | 0200382    |                  |
| 1149           | 32010037      | 272              | 18,883           | 2,3,4          |             | 60                        | 20 psig    | 0200384    |                  |
| 1151           | 32010185      | 2                | 15               | 4              |             | 100                       | 95 psig    | 0200470    |                  |
| 1154           | 32010083      | 72               | 16,335           | 2,3,4          |             | 8                         | 6 psig     | 0200387    |                  |
| 1157           | 32010115      | 8                | 3,107            | 2,3            |             | 10                        | 8 psig     | 0200390    |                  |
| 1159           | 32010093      | 31               | 996              | 4              |             | LP                        | 10" w.c.   | 0200392    |                  |
| 1160           | 32010029      | 11               | 4,196            | 2,6            |             | 8                         | 7 psig     | 0200393    |                  |
| 1163           | 32010140      | 1                | 5000 (approx)    | unk            |             | 10                        | 9 psig     | 0200395    |                  |
| 1164           | 32010104      | 32               | 5,691            | 2,3,4          |             | LP                        | 10.5" w.c. | 0200396    |                  |
| 1165           | 32010103      | 17               | 705              | 4              |             | LP                        | 10" w.c.   | 0200397    |                  |
| 1170           | 32010117      | 21               | 4,491            | 2,3            |             | 10                        | 7.5 psig   | 0200458    |                  |
| 1171           | 32010095      | 12               | 3,455            | 2,3,4          |             | 6                         | 5 psig     | 0200868    |                  |
| 1172           | 32010189      | 12               | 2,757            | 4,6            |             | LP                        | 10" w.c.   | 0200459    |                  |
| 1173           | 32010074      | 4                | 4,972            | 2,3,4,6,8      |             | LP                        | 10.5" w.c. | 0200460    |                  |
| 1176           | 32010126      | 142              | 19,445           | 2,3,4          |             | 60                        | 30 psig    | 0200476    |                  |

|      |          |      |             |                  |
|------|----------|------|-------------|------------------|
| 1177 | 32010128 | 331  | 21,441      | 2,3,4,6          |
| 1180 | 32010053 | 54   | 8,652       | 2,3              |
| 1181 | 32010119 | 14   | 2,610       | 2,3              |
| 1182 | 32010139 | 2    | 817         | 2,3              |
| 1183 | 32010136 | 7    | 2,190       | 2                |
| 1186 | 32047001 | 50   | 12,748      | 2,3,4            |
| 1187 | 32010113 | 23   | 9,642       | 2,3              |
| 1195 | 32068001 | 7    | 3,771       | 1,2              |
| 1199 | 32010098 | 26   | 5,998       | 2,3,4            |
| 1203 | 32010144 | 30   | 10,499      | 2,4              |
| 1204 | 32010080 | 36   | 4,407       | 2,3,4            |
| 1209 | 32010090 | 90   | 27,490      | 2,3,4,6,10       |
| 1210 | 32010082 | 5    | 1,058       | 2                |
| 1211 | 32010123 | 1    | 384         | 8                |
| 1215 | 32010051 | 1334 | 84,930      | 2,3,4,6          |
| 1217 | 32010192 | 6    | 1,800       | 2                |
| 1230 | 32010165 | 89   | 5,406       | 2,3,4            |
| 1230 | 32010166 | 122  | 11,417      | 2,3,4,6,8        |
| 1237 | 32050001 | 6    | 2,410       | 2                |
| 1240 | 32010180 | 9    | 2,754       | 2                |
| 1251 | 32010176 | 926  | 93,386      | 1.25,2,2.5,3,4,6 |
| 1273 | 32047003 | 67   | 8,866       | 2,4,6            |
| 1276 | 32010188 | 6    | 28,747      | 6                |
| 1277 | 32010172 | 95   | 12,415      | 2,4              |
| 1278 | 32010174 | 58   | 5,873       | 1.25,2           |
| 1279 | 32010175 | 55   | 6,905       | 1.25,1.5,2,2.5   |
| 1280 | 32010179 | 93   | 5,257       | 2                |
| 1282 | 32064001 | 50   | 5,216       | 2,6              |
| 1285 | 32010182 | 10   | 8,003       | 2,4,6            |
| 1352 | 32051029 | 1    | 500 (aprox) | unk              |
| 1366 | 32033001 | 5    | 3,614       | 2                |
| 1367 | 32023001 | 7    | 3,375       | 1.25,2           |
| 1375 | 32051008 | 19   | 52,155      | 2,10,12,16       |
| 1377 | 32051021 | 12   | 4,717       | 2                |
| 1379 | 32051025 | 15   | 10,436      | 2,4              |
| 1405 | 32005003 | 12   | 2,940       | 2,3,4            |
| 1406 | 32006001 | 4    | 525         | 2                |
| 1413 | 32039001 | 40   | 4,677       | 2,3,4,6,8        |
| 1425 | 32012003 | 142  | 34,303      | 2,3,4            |
| 1430 | 32034001 | 1    | 841         | 2                |
| 1434 | 32054001 | 27   | 25,352      | 2,3              |
| 1435 | 32053001 | 11   | 803         | 2                |
| 1439 | 32066002 | 9    | 440         | 2                |
| 1440 | 32017001 | 34   | 5,063       | 2,3,4            |
| 1441 | 32029001 | 55   | 8,070       | 2,3              |

|    |          |         |
|----|----------|---------|
| 60 | 30 psig  | 0200879 |
| 9  | 8 psig   | 0200874 |
| 60 | 10 psig  | 0200477 |
| 60 | 40 psig  | 0200876 |
| 60 | 10 psig  | 0200889 |
| 10 | 6 psig   | 0206235 |
| 10 | 8 psig   | 0206232 |
| 15 | 11 psig  | 0200972 |
| 20 | 15 psig  | 0206520 |
| 60 | 30 psig  | 0208722 |
| 60 | 22 psig  | 0208562 |
| 60 | 50 psig  | 0210214 |
| 60 | 15 psig  | 0210286 |
| 60 | 40 psig  | 0210709 |
| 60 | 48 psig  | 0211762 |
| 15 | 10 psig  | 0212245 |
| 5  | 10 psig  | 0200191 |
| LP | 10" w.c. | 0200191 |
| 10 | 100 psig | 0200952 |
| 60 | 40 psig  | 0209287 |
| 20 | 40 psig  | 0200293 |
| 5  | 4 psig   | 0200310 |
| 99 | 73 psig  | 0200405 |
| 10 | 38 psig  | 0200335 |
| 10 | 7 psig   | 0200721 |
| 10 | 11 psig  | 0201008 |
| 60 | 28 psig  | 0201007 |
| 60 | 25 psig  | 0200921 |
| 60 | 50 psig  | 0211320 |
| 60 | 12 psig  | 0200015 |
| 10 | 5 psig   | 0200409 |
| 10 | 5 psig   | 0200410 |
| 60 | 30 psig  | 0209741 |
| 60 | 25 psig  | 0209818 |
| 60 | 40 psig  | 0210406 |
| 10 | 35 psig  | 0200811 |
| 16 | 7.5 psig | 0200411 |
| 60 | 10 psig  | 0200207 |
| 42 | 30 psig  | 0200229 |
| 10 | 8 psig   | 0200421 |
| 60 | 25 psig  | 0200792 |
| 10 | 6 psig   | 0200892 |
| 60 | 20 psig  | 0210154 |
| 10 | 8 psig   | 0210363 |
| 10 | 7 psig   | 0210362 |

|      |          |     |               |           |
|------|----------|-----|---------------|-----------|
| 1442 | 32056001 | 43  | 6,476         | 2,3,4     |
| 1462 | 32048007 | 5   | 3,536         | 2,4       |
| 1488 | 32065001 | 7   | 3,718         | 2         |
| 1523 | 32010067 | 88  | 5,423         | 2,4,8     |
| 1526 | 32010058 | 303 | 33,350        | 2,3,4,6   |
| 1529 | 32010064 | 35  | 8,353         | 2,3,6     |
| 1533 | 32010072 | 152 | 23,415        | 2,3,4,6   |
| 1536 | 32010068 | 115 | 14,173        | 2,4       |
| 1538 | 32010071 | 64  | 19,403        | 2,3,4,6   |
| 1539 | 32010069 | 19  | 6,798         | 2,3       |
| 1542 | 32010161 | 2   | 1,608         | 2         |
| 1543 | 32010070 | 110 | 35,356        | 2,3,4,6   |
| 1544 | 32010055 | 3   | 1000 (approx) | unk       |
| 1545 | 32010153 | 233 | 11,449        | 2,3       |
| 1547 | 32010063 | 33  | 2,681         | 2         |
| 1556 | 32010046 | 776 | 62,642        | 2,3,4     |
| 1564 | 32010154 | 784 | 51,235        | 2,4,6     |
| 1565 | 32010155 | 5   | 3,904         | 2,3,4     |
| 1568 | 32010156 | 495 | 50,302        | 2,4       |
| 1569 | 32010164 | 19  | 7,285         | 2,3,4     |
| 1570 | 32010159 | 23  | 14,872        | 2,4,6     |
| 1585 | 32010005 | 80  | 7,272         | 2,3,4     |
| 1586 | 32010007 | 107 | 7,518         | 2,3,4,6,8 |
| 1587 | 32010009 | 179 | 11,444        | 2,3,4,6   |
| 1590 | 32010006 | 8   | 1,023         | 3         |
| 1591 | 32010152 | 34  | 3,211         | 2         |
| 1594 | 32010148 | 14  | 4,269         | 2         |
| 1595 | 32010147 | 88  | 11,599        | 2,3       |
| 1597 | 32010162 | 6   | 3,209         | 2         |
| 1599 | 32010163 | 237 | 11,392        | 2,3       |
| 1617 | 32010021 | 32  | 10,595        | 2,4       |
| 1633 | 32010025 | 27  | 9,561         | 2         |
| 1635 | 32010039 | 32  | 10,302        | 2         |
| 1636 | 32010022 | 47  | 10,595        | 2,4       |
| 1638 | 32055001 | 92  | 36,866        | 2,3,4,6   |
| 1640 | 32010017 | 248 | 25,800        | 2,3,4,6   |
| 1664 | 32049003 | 94  | 15,096        | 2,3,4,6   |
| 1669 | 32049004 | 9   | 2,310         | 2         |
| 1670 | 32049005 | 151 | 24,223        | 2,4       |
| 1671 | 32049009 | 2   | 400           | 2         |
| 1672 | 32049002 | 48  | 7,016         | 2         |
| 1673 | 32049001 | 87  | 18,013        | 2,3       |
| 1674 | 32049010 | 3   | 338           | 2         |
| 1684 | 32001013 | 10  | 595           | 4         |
| 1687 | 32001015 | 24  | 2,347         | 2,4       |

|    |           |         |
|----|-----------|---------|
| 10 | 7 psig    | 0210230 |
| 8  | 6 psig    | 0200425 |
| 60 | 3 psig    | 0210247 |
| 15 | 12 psig   | 0200272 |
| 14 | 12 psig   | 0200143 |
| 20 | 14.5 psig | 0200163 |
| 20 | 15 psig   | 0200144 |
| 12 | 7 psig    | 0200145 |
| 58 | 45 psig   | 0200445 |
| 24 | 18 psig   | 0200621 |
| 60 | 40 psig   | 0201005 |
| 60 | 50 psig   | 0201012 |
| 15 | 10.5 psig | 0201013 |
| 60 | 18 psig   | 0206664 |
| 10 | 8 psig    | 0200955 |
| 10 | 8 psig    | 0200238 |
| 30 | 25 psig   | 0200654 |
| 60 | 50 psig   | 0206610 |
| 60 | 30 psig   | 0200963 |
| 60 | 30 psig   | 0206597 |
| 60 | 40 psig   | 0206598 |
| 5  | 41 psig   | 0200247 |
| 7  | 6 psig    | 0200241 |
| 8  | 5 psig    | 0200242 |
| 10 | 8 psig    | 0200877 |
| 60 | 10 psig   | 0200724 |
| 60 | 10 psig   | 0206606 |
| 60 | 10 psig   | 0206607 |
| 60 | 25 psig   | 0206608 |
| 60 | 25 psig   | 0208608 |
| 18 | 10 psig   | 0200454 |
| 60 | 12 psig   | 0200740 |
| 60 | 12 psig   | 0206557 |
| 10 | 6 psig    | 0208335 |
| 60 | 50 psig   | 0210841 |
| 7  | 5 psig    | 0211082 |
| 20 | 15 psig   | 0200689 |
| 20 | 12 psig   | 0200691 |
| 60 | 23 psig   | 0200956 |
| 8  | 5 psig    | 0200888 |
| 8  | 5 psig    | 0206403 |
| 37 | 12 psig   | 0208560 |
| 60 | 10 psig   | 0208564 |
| 16 | 11 psig   | 0200706 |
| 6  | 5 psig    | 0200705 |

|        |          |     |        |                  |
|--------|----------|-----|--------|------------------|
| 1688   | 32001006 | 125 | 20,218 | 2,4              |
| 1690   | 32001021 | 81  | 25,816 | 2                |
| 1691   | 32001017 | 17  | 1,736  | 2                |
| 1692   | 32001008 | 54  | 6,109  | 2, 3, 4          |
| 1693   | 32001024 | 18  | 2,147  | 4                |
| 1694   | 32001019 | 4   | 275    | 2                |
| 1695   | 32001007 | 2   | 3,588  | 2,3,4            |
| 1696   | 32001005 | 5   | 1,224  | 2,3              |
| 1851   | 32010059 | 289 | 25,583 | 2, 4, 6          |
| 1853   | 32010150 | 13  | 1,474  | 3                |
| 1856   | 32010183 | 4   | 2,357  | 2                |
| 1857   | 32010184 | 4   | 765    | 2                |
| 1858   | 32010186 | 453 | 27,120 | 1, 2, 3, 4, 6, 8 |
| 1859   | 32010045 | 26  | 7,518  | 2, 3, 4          |
| 817715 | 32007001 | 5   | 1,045  | 2                |
|        |          | 6   | 4,500  | unk              |
| 803523 | 32048001 | 0   | 21,550 | 2, 3, 6          |
| 805544 | 32019001 | 163 | 43,042 | 1, 2, 3          |
| 817712 | 32044001 | 122 | 13,210 | 2, 3, 4          |
| 817714 | 32041001 | 20  | 9,492  | 1, 2, 4          |
| 817716 | 32040001 | 42  | 4,571  | 2, 4             |
| 817717 | 32011001 | 38  | 14,053 | 2, 3, 4          |
| 817718 | 32043001 | 77  | 10,764 | 2, 3, 4          |
| 817719 | 32045001 | 39  | 5,289  | 2, 3             |
| 817720 | 32042001 | 90  | 9,492  | 1, 2, 4          |
| 817721 | 32038001 | 75  | 27,466 | 1, 2, 3, 4       |
| 817724 | 32018001 | 59  | 11,083 | 2, 3, 4          |

|    |          |         |
|----|----------|---------|
| 18 | 12 psig  | 0200708 |
| 36 | 30 psig  | 0200709 |
| 12 | 8 psig   | 0200710 |
| 15 | 12 psig  | 0200219 |
| LP | 10 psig  | 0200711 |
| 10 | 6 psig   | 0206455 |
| LP | 10 psig  | 0200900 |
| 60 | 35 psig  | 0209721 |
| 60 | 20 psig  | 0208498 |
| 60 | 18 psig  | 0209339 |
| 60 | 12 psig  | 0210886 |
| 60 | 14 psig  | 0210907 |
| 60 | 45 psig  | 0211194 |
| 5  | 3 psig   | 0211292 |
| 8  | 7.5 psig | 0212035 |
| 15 | 15 psig  | 0212247 |
| 75 | 44 psig  | 0200920 |
| 41 | 25 psig  | 0212045 |
| 11 | 7.5 psig | 0212036 |
| 8  | 6 psig   | 0212024 |
| 8  | 5.5 psig | 0212031 |
| 50 | 35 psig  | 0212032 |
| 9  | 8 psig   | 0212035 |
| 10 | 9 psig   | 0212048 |
| 50 | 8.5 psig | 0212039 |
| 60 | 35 psig  | 0212046 |
| 10 | 8 psig   | 0212246 |

KY PSC Case No. 2015-00084  
Response to Staff's Data Request Set One No. 06  
Respondent: Gary E. Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION  
DATED JUNE 12, 2015**

6. Identify the number of customers, length of distribution line, and size of distribution line served by each location for which a deviation is sought.

**Response:**

See response to Staff Initial Request number 5.

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KY PSC Case No. 2015-00084  
Response to Staff's Data Request Set One No. 07  
Respondent: Gary E. Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION  
DATED JUNE 12, 2015**

7. What is the operating pressure for each location for which a deviation is sought?

**Response:**

See response to Staff Initial Request number 5.

**COLUMBIA GAS OF KENTUCKY, INC.**  
**RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION**  
**DATED JUNE 12, 2015**

8. How does Columbia currently monitor and record pressures of each of the locations for which a deviation is sought?

**Response:**

Columbia's Measurement and Regulation (M & R) technicians conduct annual inspections on each district pressure regulating station and record the "as found" and "as left" pressure in Columbia's Work Management System.

Columbia's winter operations planning also has a pressure monitoring and recording element. Columbia's engineering department develops and communicates a pressure set point recommendation and monitoring plan. The plan also includes recommendations for the placement of temporary pressure recording gauges and pressure monitoring points. This plan designates temperature thresholds at which field operations and M & R conduct pressure surveys. The results of the survey are noted on forms and sent to engineering and M & R leadership for review. The data allows Columbia to examine a

station's performance under peak conditions and compare to Columbia's hydraulic model of its infrastructure.



**COLUMBIA GAS OF KENTUCKY, INC.**  
**RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION**  
**DATED JUNE 12, 2015**

9. If the Commission were to grant the requested deviations for the locations identified in Item 5 above, will each of these locations comply with 49 C.F.R. Part 192.741? Describe.

**Response:**

Yes. Columbia's infrastructure includes recording pressure gauges or telemetering devices on all distribution systems supplied by more than one district pressure regulating station to satisfy 49 C.F.R. Part 192.741 (a). On distribution systems supplied by a single district pressure regulating station, Columbia installs a secondary over-pressure protective device on systems that do not already include a pressure relief valve on systems that have fewer than 100 customers. To satisfy 49 C.F.R. Part 192.741 (b), Columbia's station design considers the pressure differential across the district station, the number of valves in the by-pass, the capacity of the station, the presence of internal relief on the regulators, and the presence of customers having large volume measurement equipment on the system. Anytime Columbia encounters an abnormal operating

condition at a pressure control station, an investigation is initiated, inspection is conducted, and corrective actions taken in accordance with 49 C.F.R. 192.741 (c).

KY PSC Case No. 2015-00084  
Response to Staff's Data Request Set One No. 10  
Respondent: Gary E. Sullivan

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO STAFF'S INITIAL REQUEST FOR INFORMATION  
DATED JUNE 12, 2015**

10. Is Columbia aware of the Commission having granted a deviation from the requirements of 807 KAR 5:022, Section 14(22)(a), to any utility other than Atmos Energy in Case No. 2004-00275?<sup>4</sup>

**Response:**

As far as Columbia can determine, Atmos is the only other utility that has requested a deviation from 807 KAR 5:022, Section 14 (22)(a). The requested deviation was granted in Case No. 2004-00275 and subsequently in Case No. 2005-00442.

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<sup>4</sup> Case No. 2004-00275, *Application of Atmos Energy Corporation for a Limited Deviation from the Requirements of 807 KAR 5:022, Section 4(23)(B)(1-4), and 807 KAR 5:022, Section 14(22)(a)* (Ky. PSC Jan. 20, 2005).