

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY FRONTIER GAS, LLC)	
)	
_____)	CASE NO.
)	2019-00280
ALLEGED VIOLATION OF UNDERGROUND)	
FACILITY DAMAGE PREVENTION ACT)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO KENTUCKY FRONTIER GAS, LLC

Kentucky Frontier Gas, LLC (Kentucky Frontier), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Frontier shall make timely amendment to any prior response if Kentucky Frontier obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request

to which Kentucky Frontier fails or refuses to furnish all or part of the requested information, Kentucky Frontier shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Frontier shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

Kentucky Frontier's responses will also be incorporated by reference into proceedings for Case Nos. 2019-00309, 2019-00314, 2019-00315, 2019-00316, 2019-00317, 2019-00218, 2019-00319, 2019-00320, 2019-00321, 2019-00322, 2019-00323, 2019-00324 (collectively, with this case, referred to as Damage Prevention Cases).

1. In its responses to the initiating Orders in the Damage Prevention Cases, Kentucky Frontier states that over ten years, it has acquired 12 small, dysfunctional gas systems with no or limited maps of the systems. For each system,

a. Identify the name of the system and the the date it was acquired by Kentucky Frontier.

b. State the total number of miles in the pipeline by pipe diameter size and pipe material.

c. State whether Kentucky Frontier obtained a system map from a prior owner or operator of the system. If so, produce a copy of the map.

d. Describe all efforts by Kentucky Frontier to locate and map pipelines in the system.

e. Identify by date, location, and pipe material all incidents of excavation damage to the system's pipelines that occurred during the period from January 1, 2016, to September 30, 2019.

f. For each incident of excavation damage, provide an estimate of the volume and cost of natural gas lost as a result of the incident and the cost to repair the damage.

g. State whether Kentucky Frontier investigated the cause of each of the incidents of excavation damage on the system, and, if so, state the results of each investigation. In particular, your response should state whether Kentucky Frontier provided a temporary marking of the approximate location of the line that was damaged before the activity causing the damage occurred.

h. For each incident of excavation damage for which Kentucky Frontier determined an excavator was at fault, state whether Kentucky Frontier sought to recover the cost of repairing the damage from the excavator and, if so, how much was billed and recovered. If Kentucky Frontier did not seek to recover the cost of repairing excavation damage to the pipeline, explain why it did not.

2. Identify by date, location, pipe material, and date of installation of all incidents of excavation damage to underground gas pipelines installed by Kentucky Frontier and not purchased as part of another system.

3. With certain inapplicable exceptions, 49 C.F.R. § 614(a) requires each operator of a buried pipeline to carry out a written program to prevent damage to that pipeline from excavation activities. Produce a copy of the written damage prevention program of Kentucky Frontier, including all revisions to the program since January 1, 2016.

4. Pursuant to 49 C.F.R. § 192.614(c)(5), the damage prevention program required by 49 C.F.R. § 192.614(a) must provide for temporary marking of buried pipelines in the area of excavation before, as far as practical, the activity begins. State whether Kentucky Frontier has written procedures for responding to pipeline location requests and providing temporary marking of underground pipelines in the area of excavation before the activity begins. If so, produce a copy of the procedures and all versions of the procedures in effect since January 1, 2016.

5. As required by 49 C.F.R. § 192.603(b), each operator is to keep records necessary to administer the procedures established under 49 C.F.R. § 192.605, including the procedures established as part of an operator's written damage prevention program. Identify and describe all records that Kentucky Frontier has maintained pursuant to 49 C.F.R. § 192.603(b) to administer the procedures in its written damage prevention program for the period January 1, 2016, to present, including records of actions taken by Kentucky Frontier in response to line-locate requests.

6. Admit that Kentucky Frontier failed to provide temporary marking of the pipelines damaged by excavation activity that are the subject of the Damage Prevention cases now pending before the Commission.

7. In the 2018 Status of Pipeline Replacement Project (PRP) file in Case No. 2017-00263, Kentucky Frontier states that it spent \$22,600 on 15 miscellaneous projects due to leaks, dig-ins, and washouts. Provide a breakdown of costs of each individual project and indicate if any of the projects were subject to the Damage Prevention cases now pending before the Commission.

8. In the 2018 PRP report filed on April 17, 2019, Kentucky Frontier states that it expended \$1,731 on ERSI/GIS. Provide the status of the ERSI/GIS project, including the total funds expended to date, the percentage completion of the project, and the estimated completion of the project.

9. In its responses to the initiating orders in the Damage Prevention Cases, Kentucky Frontier states that it had about 3,000 line-locate requests in 2018 through the 811 system. According to the Kentucky Contact Center, Kentucky Frontier had 1,415 line-locate tickets in 2018. Explain the discrepancy.

10. According to the Kentucky Contact Center, Kentucky Frontier had 910 line-locate tickets for the period January 1, 2019, to September 30, 2019. Explain the reduction in the monthly average number of line-locate requests received by Frontier in 2018 and through September in 2019.

11. Some of the excavation damage incidents that are the subject of the Damage Prevention cases now pending before the Commission are dig-ins on steel pipe. Does Kentucky Frontier contend that these lines were not locatable?

12. On page 2 of Kentucky Frontier's response filed on September 17, 2019, Kentucky Frontier lists six investments it has made or plans to make in the near future to help it locate "untraceable" lines.

- a. Provide an update as to whether those items have been purchased or ordered.
- b. Will the purchase of any of these items require debt financing?
- c. Confirm whether Kentucky Frontier will seek to recover the cost of the investments in a future rate case.



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ATTEST:

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