

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 SECOND 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 on November 4, 2019. 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, and 2019-00324 (collectively, with this case, referred to as Damage Prevention Cases).

1. Refer to Kentucky Frontier's response to question 1d. 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.

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?

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?

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?

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?

For 
Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED OCT 29 2019

cc: Parties of Record

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