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PUBLIC SERVICE
COMMISSION

March 31, 2020

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

Dear Mr. Chandler,

Pursuant to the Commission's Order of February 26, 2001 in Case No. 2000-429, Columbia Gas of Kentucky, Inc. hereby files its annual report for the Statistical Meter Testing Plan. The Report narrative is submitted electronically in accordance with the Commission's directives in Case No. 2020-00085. Columbia respectfully asks that it be allowed to deliver to the Commission the detailed Exhibits, normally provided in binders as part of this annual filing, when it is safe to do so. The exhibits are large files that are not email compatible.

If you have any questions, please contact me at (859) 321-5804 or jmcoop@nisource.com. Thank you.

Sincerely,

/s/ Judy Cooper

Judy M. Cooper
Director, Government and Regulatory Affairs

COLUMBIA GAS OF KENTUCKY INC.

2019 METER SAMPLING ANNUAL REPORT

Columbia Gas of Kentucky completed the twenty-third year of their Meter Sampling program in December 2019.

A total of 4726 meters making up 35 homogenous groups were sampled in 2019. Details are listed in the Evaluation of Data and Corrective Actions below.

In 2019 Columbia Gas of Kentucky service personnel made 44,442 visits to our customers' premises working orders that involved inspecting house lines and / or appliances. Columbia inspected 52,064 meter set assemblies in conjunction with the Customer Service Line Survey program.

No regulator failure in 2019 resulted in overpressure being delivered to the customer's piping.

Columbia continues to promote safety through:

Bills & Bill Inserts

- **Monthly -- "For Your Safety & Comfort" insert and "Scratch-n-Sniff" insert are sent to new customers and includes information about maintenance of customer-owned buried gas lines and Kentucky 811.**
- **1/19-- Notice of Buried Gas Lines insert sent to all customers. (Also sent to new customers throughout the year.)**
- **1/19 -- "For Your Safety & Comfort" insert sent to all residential and small commercial customers. Includes information about carbon monoxide poisoning prevention and heating equipment maintenance.**
- **5/19 -- "Your Service" customer newsletter included article about Call 811 Before You Dig, dangers of energy theft, flooding and how to spot an imposter.***
- **8/19 -- "Your Service" customer newsletter included articles about Call 811 Before You Dig, odor recognition and response, and heat stress.***

- 11/19 -- "Your Service" customer newsletter included articles about Stop-Leave-Call, carbon monoxide, space heater safety, keep ice/snow away from meter, and how to spot an imposter.*
- Left column of monthly bill for residential and small commercial customers includes bill messages regarding odor recognition/response, call before you dig and employee identification.
- Billing envelope (back flap) has Call 811 Before You Dig message.

*Email version of newsletter sent to customers for whom we have email addresses.

Website

Redesigned website launched in 2019 offers safety information in new, easier to read format.

- Safety tips, including Stop-Leave-Call, 811, carbon monoxide, flooding, winter weather, disaster preparedness, appliance safety, work zone safety
- Kentucky 811 information and link
- Contact Us form where customers can email safety-related and other questions to CKY staff
- News releases with safety information in News Room section
- Alert Center with information about outages and service restoration

Electronic Communications/Social Media/Printed Material

- Extensive use of company Facebook and Twitter pages to communicate a variety of safety messages, including 811, odor recognition/response, winter safety, appliance safety, carbon monoxide poisoning prevention, etc.
- 11/19 – “What’s That Smell” letter (English/Spanish) with scratch-n-sniff insert mailed to all e-Bill customers.

Community Outreach

- 3/21/19 – Booth at Home Depot in Lexington during Contractor Appreciation Day to promote 811 among excavators
- 8/8/19 – Booth at Thursday Night Live in Lexington to promote 811
- 8/10/19 – Booth at KET Super Saturday to promote 811
- 8/21/19 and 10/19/19 – Booth at Walk to End Alzheimer’s in Lexington and Ashland to promote 811
- 9/7/19 – Booth at Lexington Roots & Heritage Festival to promote diverse recruiting and 811
- 9/14/19 – Booth at Latino Festival to promote diverse recruiting and 811
- 9/15/19 – Participated in Touch A Truck to promote 811
- 11/2/19 -- VA5K event held in Lexington raised money for veterans programs while promoting 811.
- Flyers provided to employees to use when discussing 811 with friends, neighbors.
- Customer letters and door hangers associated with large pipeline replacement projects include information about odor recognition/response.
- Job site media interviews usually include messaging about Call Before You Dig; odor recognition/response.

- English/Spanish pipeline safety brochure distributed at public events.
- Natural gas safety education materials provided to teachers upon request through the National Energy Foundation.
- 811 logo added to Prichard Committee for Academic Excellence newsletter and LFUCG Councilwoman Bledsoe's constituent newsletter.

Advertising

- TV campaign/weather sponsorship on WLEX (6am and 6pm broadcasts) from January through June 2019.
- Commercial radio in Lexington and Ashland markets for 811 and Stop-Leave-Call messaging
- Spanish public radio in Lexington for 811 and Stop-Leave-Call messaging
- Call 811 Before You Dig billboard located on I-75N near the Madison-Fayette County line.
- Search Engine Marketing (SEM) campaign regarding Call 811 Before You Dig and Stop-Leave-Call.
- Social media ads regarding Call 811 Before You Dig and Stop-Leave-Call.

Excavator/Emergency Responder Training/Outreach

- Sponsored natural Gas 101 training sessions for excavators and emergency responders January 29-March 14 in Mt. Sterling, Hazard, Grayson, Prestonsburg, Pikeville, Berea, Ashland, Manchester, Florence and Lexington.
- Conducted natural gas fire training for Georgetown Fire Department 5/14-16/19 and Jessamine County Fire Department on 6/11/19.
- Conducted emergency exercises in Maysville on 1/31/19 and Georgetown on 5/17/19.
- 12/19 -- Letter from Field Operations Leaders to public officials regarding 811 and railroad derailment procedures.

Evaluation of Data

- A total of 4558 domestic meters making up 31 homogenous Control Groups were sampled in 2019.

- **Of the 4558 meters sampled 283 tested outside the required accuracy of +/- 2% and were classified a failed meter.**
- **6.2% of the domestic meters pulled for meter sampling failed.**
- **27 of the 31 homogenous Control Groups passed the requirements of American National Standards Institute / American Society for Quality Control Z 1.4.**
- **A total of 222 Large Volume meters making up 4 homogenous Control Groups were sampled in 2019.**
- **Of the 222 Large Volume meters sampled, 13 tested outside the required accuracy of +/- 2% and were classified a failed meter.**
- **5.9% of Columbia Gas of Kentucky's Large Volume meters failed.**
- **All 4 Large Volume homogenous Control Groups passed the requirements of American National Standards Institute / American Society for Quality Control Z 1.4.**

Failed Family

- **Columbia Gas was able to identify specific shipments of meters in the Rockwell family NRO02 and the American families NAM07, NAM08, Columbia has created sub-families consisting of the remaining 1339 meters for 2019 and will remove these poor performing meter by the end of 2019. Also Columbia is retiring American family KYNAM01 due to poor performance, this is the oldest American family.**

Corrective Action

- **Columbia Gas of Kentucky will continue to in-test and retire, when pulled from service, meters that have established a poor performance record even though their group has not failed. In previous filings we have listed individual meters that are retired due to poor performance. We are now in-testing and retiring all meters that are not temperature compensated. This eliminates poor performing meters from being re-installed.**

Regulator Failures

- **Columbia Gas of Kentucky had 66 regulator failures in 2019. Due to full internal relief of the regulator, none resulted in an overpressure situation for the customer.**
- **48 regulators had gas leakage from the vent.**
- **16 regulators would not adjust or lock up correctly.**
- **2 regulators were leaking from fittings or damaged**

Should you have any questions, contact Ryan Twait at (859) 288-0234.

/s/ Ryan Twait

**Ryan Twait
Compliance Manager
Columbia Gas of Kentucky**