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August 18, 2021

TO: ALL NATURAL GAS DISTRIBUTION OPERATORS IN KENTUCKY

RE: STATUTORY MANDATE TO UPDATE INSPECTION AND MAINTENANCE PLANS TO ADDRESS ELIMINATING HAZARDOUS LEAKS AND MINIMIZING RELEASES OF NATURAL GAS FROM PIPELINE FACILITIES

The Pipeline and Hazardous Materials Safety Administration (“PHMSA”) has issued an Advisory Bulletin to owners and operators of natural gas pipeline distribution systems to update their inspection and maintenance plans to address the elimination of hazardous leaks and minimization of releases of natural gas (including, and not limited to, intentional venting during normal operations) from their systems before December 27, 2021. PHMSA’s advisory bulletin ADB-2021-01 was issued on June 4, 2021. Detailed requirements to be inspected by state pipeline safety inspectors are outlined in the advisory and should be reviewed before responding to this request. Also, review PHMSA’s Advisory Bulletins ADB-99-01, ADB-99-02, and ADB-99-07 for information relating to this request.

One area outlined in ADB-2021-01 addresses the actions to be taken for the replacement or remediation of pipelines that are known to leak based on the material (including cast iron, unprotected steel, wrought iron, and historic plastics with known issues) to be included in each Operators’ Operation and Maintenance (O&M) plans.

To provide context in planning the inspections regarding this requirement, the Commission requests the following information from each Operator. Provide a response for each requested item. If you do not have the information to definitively answer, state such and provide any information you have on the subject.

Provide the amount, location, and specific replacement or remediation plan for each of the following:

- Cast Iron Pipe (miles and location)
- Unprotected Bare Steel Pipe (miles and location)

- Wrought Iron Pipe (miles and location)
- Low Ductile Inner Wall Aduyl-A Pipe Pre-1973 Vintage (miles and location)
- Polyethylene Gas Pipe Designated PE 3306 (miles and location)
- Century Utility , Inc. Products (quantity and location)
- Delrin Insert Tap Tees (quantity and location)
- Plexco Service Tee Celcon (polyacetal) Caps (quantity and location)

In addition, discuss for each of the infrastructure items listed above, the procedures that have been used to monitor leaks and develop mitigating actions to be taken to address the risk assessment determined by your Distribution Integrity Management Plan.

You are requested to provide a written response to the Commission by at PSCED@KY.GOV by September 17, 2021.

Should you have any questions regarding this request contact Melissa Holbrook, Assistant Director and Pipeline Safety Program Manager at 502-782-2603 or email at MelissaC.Holbrook@ky.gov.



Lindsey Flora
Deputy Executive Director
Public Service Commission