

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF THE UNION LIGHT,)
HEAT AND POWER COMPANY FOR AUTHORITY) CASE NO. 92-381
TO IMPLEMENT A GAS SERVICES SAFETY)
INSPECTION PILOT PROGRAM)

O R D E R

On September 3, 1992, The Union Light, Heat and Power Company ("ULH&P") filed an application with the Commission requesting a deviation from 807 KAR 5:006, Section 25(5)(a)(1),¹ during the term of a pilot program.

ULH&P proposes that all curb boxes on inside meter sets be inspected and checked for accessibility not less than once in a calendar year, but not necessarily within a 15-month time span. ULH&P proposes to inspect and check for accessibility not less than once every 5 years the curb boxes located on outside meter sets. Currently ULH&P inspects each one of the 59,723 curb boxes in its system every year. The accessibility of the curb boxes is recorded under the annual curb box inspection program. The reference measurements for the location of the curb boxes are recorded in a computerized Gas Service Information System ("GSIS").

¹ 807 KAR 5:006, Section 25(5)(a)(1), states "At intervals not to exceed every fifteen (15) months but at least once every calendar year, the utility shall inspect and visually examine accessibility of the curb box and valve on a service line."

ULH&P has demonstrated a high level of accuracy of its GIS program to Commission Staff.²

ULH&P stated that it inspects the accessibility of the curb boxes in different programs: 1) meterage change program accounts for 8,722 curb boxes annually; 2) leak survey which requires that approximately 1,400 curb boxes be inspected annually; 3) regulator and relief valve inspection which accounts for 300 curb boxes; 4) cathodic protection inspection which requires 300 curb boxes be inspected annually; 5) business leak survey which accounts for the inspection of 3,000 curb boxes annually; and 6) underground damage prevention program that requires 9,000 curb boxes be inspected. ULH&P stated that if the pilot program is granted, it will merge all these programs in 1994.

ULH&P indicated that the combination of these programs and the annual curb box accessibility program results in some curb boxes being inspected more than once annually.

ULH&P stated that curb boxes are not required for outdoor meter sets if the service tee incorporates a positive shut-off valve that can be operated with ordinary, readily available tools and is not located under hard pavement.³ But ULH&P has not provided information about the accessibility of the positive shut-off valves on its service lines.

ULH&P stated that its current policy is to install a curb box and valve on each new or renewed service line. ULH&P currently has

² Staff Memorandum to Case File 92-381, dated October 1, 1992.

³ 807 KAR 5:022, Section 9(17).

59,723 curb boxes: 26,431 curb boxes are on outside meter sets, and 33,292 curb boxes are on inside meter sets. ULH&P is requesting a deviation from 807 KAR 5:006, Section 25(5)(a)(1), on the curb boxes on outside meter sets only; and, according to ULH&P, this will provide an annual savings of \$88,597.

After reviewing the record and being advised, the Commission finds that:

1. ULH&P is requesting a temporary waiver from 807 KAR 5:006, Section 25(5)(a)(1)(iii), during the term of the pilot program for the curb boxes located on service lines with outside meter sets. ULH&P's proposal is to inspect such curb boxes for accessibility every 5 years.

2. ULH&P's request currently accounts for 26,431 curb boxes or 44 percent of its total curb boxes.

3. ULH&P carries out other inspection programs. Curb boxes are inspected for accessibility in its other programs. ULH&P stated that a total of 22,722 curb boxes are inspected annually within the other programs. If ULH&P synchronizes the inspection of the curb boxes by the other programs with the annual curb box inspection programs, it could reduce the number of curb boxes needed to be inspected by the annual curb box accessibility program.

4. ULH&P estimates an annual savings of \$88,597 if its pilot program is approved. But if the other inspection programs are adjusted with the curb box inspection program and the repetition is eliminated, the savings would be much less than the estimated

amount suggested by ULH&P. The savings will be insignificant compared to the level of safety that could be reduced by the proposed program.

5. ULH&P has not provided records or a program for the location and accessibility of the positive shut-off valves that are installed on service tees.

6. ULH&P's requested waiver from 807 KAR 5:006, Section 25(5)(a)(1), should be denied because it will reduce the effectiveness of the Commission's gas safety regulations.

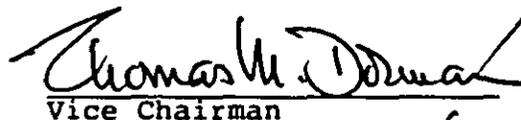
7. ULH&P should consider the cost savings by synchronizing all its inspection programs to reduce the repetition of inspecting some curb boxes several times annually while others are not inspected for several years.

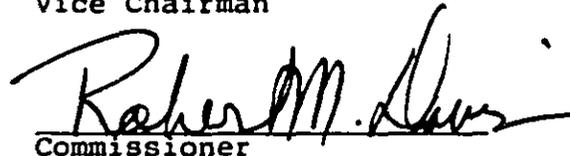
IT IS THEREFORE ORDERED that ULH&P's request for a deviation from 807 KAR 5:006, Section 25(5)(a)(1), be and it hereby is denied.

Done at Frankfort, Kentucky, this 19th day of January, 1993.

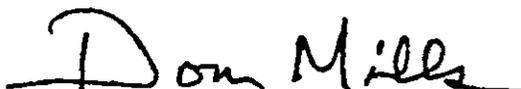
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