

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN APPLICATION BY THE UNION LIGHT, HEAT)
AND POWER COMPANY FOR PERMISSION TO) CASE NO. 94-039
DEVIATE FROM 807 KAR 5:022, ODORIZATION)
OF GAS, SECTION 13, PARAGRAPH 17)

O R D E R

On February 1, 1994, The Union Light, Heat and Power Company ("ULH&P") requested a deviation from 807 KAR 5:022, Section 13(17)(g)(4).¹ ULH&P proposes to sample combustible gases for odorant concentration on a bimonthly rather than weekly basis for the areas served by its Alexandria and Cold Spring city gate stations. The proposal is based on the installation of continuously monitored odorant injectors at these locations.

On February 17, 1994, Staff visited ULH&P's Control Center and Alexandria Station and met with the personnel who operate the odorization systems.

In response to information requests from the Commission, ULH&P estimated that it would save \$3,698.76 annually by performing periodic odorometer testing on a bimonthly rather than a weekly basis.

After considering the evidence of record and being sufficiently advised, the Commission finds that:

¹ 807 KAR 5:022, Section 13(17)(g)(4), states "Separately odorized systems with more than ten (10) customers shall be sampled for proper odorant level at least once each week."

1. The injection of odorant at Alexandria and Cold Springs is monitored at the Control Center at Cincinnati Gas and Electric Company offices in Cincinnati. The monitoring system is limited to monitoring and controlling the rate of odorant injection into natural gas which passes from the transmission pipelines into the ULH&P system.

2. The annual savings resulting from bimonthly testing in lieu of weekly testing is approximately \$3,700.

3. ULH&P's monitoring system at the Control Center does not measure odorant level at the checkpoints in its distribution system.

4. ULH&P uses mercaptan as odorant. Mercaptan may be absorbed by pipelines and may be oxidized while in the pipeline. ULH&P injects propane and air into its natural gas during peak shavings which may cause the odorant to be oxidized and its odorizing strength fade out to an unacceptable level. Odorant level testing is the only way to identify this problem which can be remedied by injecting additional odorant.

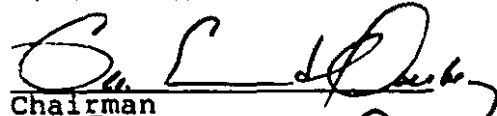
5. Extending periodic odorant level testing from weekly to bimonthly could have a negative impact on the safety of ULH&P's customers and their properties in case of gas leaks. The inability to smell oxidized mercaptan could lead to undetected gas leaks.

6. ULH&P's application for the deviation from 807 KAR 5:022, Section 13(17)(g)(4), should be denied.

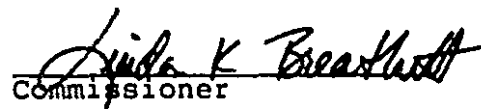
IT IS THEREFORE ORDERED that ULH&P be and it hereby is denied
a deviation from 807 KAR 5:022, Section 13(17)(g)(4).

Done at Frankfort, Kentucky, this 10th day of May, 1994.

PUBLIC SERVICE COMMISSION


Chairman


Vice Chairman


Commissioner

ATTEST:


Executive Director