

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|---------------------------------------|---|------------|
| IRVINGTON GAS COMPANY REQUEST FOR |) | CASE NO. |
| DEVIATION FROM 807 KAR 5:022, SECTION |) | 2013-00038 |
| 13(17)(G)4 |) | |

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO IRVINGTON GAS COMPANY

Irvington Gas Company ("Irvington Gas"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. Responses to information requests shall be appropriately 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.

Irvington Gas shall make timely amendment to any prior response if it 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 Irvington Gas refuses to furnish all or part of the requested information, Irvington Gas

shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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.

The following questions pertain to each of Irvington Gas's systems in which propane is being delivered to customers via a pipeline system and therefore subject to Commission jurisdiction.

1. For each system, provide the following:
 - a. Number of customers being served;
 - b. Number of tanks and the capacity of each;
 - c. Specification of mains;
 - i. Total length of pipelines per system;
 - ii. Size (diameter);
 - iii. Maximum Allowable Operating Pressure (MAOP);
 - iv. Actual operating pressure.
 - d. Provide a map showing the location and layout of all principal items of plant (i.e., tanks), as well as the location and size of distribution lines and service connections. Identify any schools, hospitals, and nursing home facilities located near each system.

2. In its application, Irvington Gas states since it is “receiving odorized product” and does “not add additional odorant to the product” it “should receive a waiver **from the regulations.**” (Emphasis added). 807 KAR 5:022, Section 13(17)(g) requires the sampling of combustible gases to assure proper concentration of odorant. Specifically, it requires in part:

- Section 13(17)(g)(1) – Sampling of gases in each separately odorized system at approximate furthest point from injection of odorant.
- Section 13(17)(g)(2) – Sampling conducted with equipment designed to detect and verify proper level of odorant.
- Section 13(17)(g)(4) – Sampling for proper odorant level at least once each week.

From which of these requirements is Irvington Gas seeking a deviation?

3. If deviations to 807 KAR 5:022, Section 13(17)(g)(1), (2), and (4) are granted, is Irvington Gas seeking deviations from 49 CFR 192.625(f) as well?

4. Does Irvington Gas rely solely on the documentation from the propane suppliers to determine the level of odorant in its system(s)?

5. Does Irvington Gas currently conduct any odorant samplings with equipment for these systems? If yes, provide copies of the odorant sampling records for the period of January 1, 2012 through December 31, 2012.

6. Does Irvington Gas conduct “sniff tests” for these systems?

a. If yes, explain how often these tests are conducted and provide copies of records for the period of January 1, 2012 through December 31, 2012.

b. If no, explain how Irvington Gas can ensure that the odorant in these systems is readily detectable at all times.

7. How often are Irvington Gas personnel in these systems performing operation and maintenance or other activities?

8. How many suppliers provide propane to these systems? Provide all invoices from deliveries to these systems for the period of January 1, 2012 through December 31, 2012.

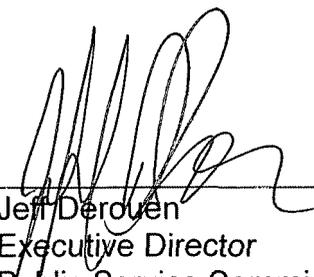
9. On average, how often are each of the tanks filled?

10. How many Irvington Gas customers in these systems use propane as the primary source of heat?

11. How does Irvington Gas determine each customer's primary or secondary use of propane?

12. Has the usage of propane in these systems changed? If so, in what way?

13. Provide a copy of the current Operations and Maintenance Manual for Irvington Gas.



Jeff Derouen
Executive Director
Public Service Commission
P. O. Box 615
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DATED APR 24 2013

cc: Parties of Record

Case No. 2013-00038

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