

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CITY OF DRAKESBORO D/B/A )  
DRAKESBORO NATURAL GAS )  
COMPANY )  
\_\_\_\_\_)  
ALLEGED FAILURE TO COMPLY WITH )  
KRS 278.495, 807 KAR 5:027, AND )  
49 C.F.R. PART 192 )

MOTION TO MODIFY FILING OBLIGATION

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Comes now, the City of Drakesboro, by counsel, hereby moves the Commission to modify its prior order to the extent that it requires bi-weekly electronic filing. In support of its motion, the City states as follows:

Shortly after the discovery of various leaks within the City's distribution system, an emergency hearing was held and an order was entered requiring that the City take certain steps to ensure that the dangers posed by the leaks were immediately corrected. Further, the Commission required that the City provide bi-weekly updates to the Commission regarding the status of compliance actions taken, including reports of leaks, resolution of any leaks, the response times for such resolutions, and other related activities.

The City has complied with these reporting requirements. At the most recent status hearing, the Commission was provided with substantial evidence of the City's efforts to comply with the requirements imposed by federal and state regulatory authorities. The City has also complied with the reporting requirements.

However, it is the understanding of the undersigned that the City and representatives of the state investigative agencies have discussed the bi-weekly requirement of reporting. It is understood that the state officials involved directly with the oversight of the City's operations and the City each hold the

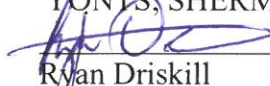
position that further bi-weekly reports on compliance efforts are no longer necessary.

Thus, the City hereby moves that the prior order requiring bi-weekly reporting be lifted and/or modified. The City seeks that the reporting requirements be quarterly or monthly – thereby, alleviating some of the burden imposed on its small staff.

WHEREFORE, the City moves for an order in conformity with the above requests.

Respectfully submitted,

YONTS, SHERMAN & DRISKILL, P.S.C.



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CERTIFICATE OF SERVICE

This is to certify that the above motion was mailed via first class prepaid, overnight, USPS mail to the Commission on this the 18th day of September, 2019 at the following address:

John Park  
211 Sower Boulevard  
Frankfort, Kentucky 40601



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Ryan Bennett Driskill