290 W. Nationwide Blvd. Columbus, Ohio 43215

Direct: 614.460.5558 bwancheck@nisource.com



December 21, 2020

## SENT VIA ELECTRONIC MAIL

Linda C. Bridwell Executive Director Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40602-0605

RE: KY PSC Case No. 2020-00085

Dear Ms. Bridwell,

Pursuant to the Commission's March 16, 2020 Order, Columbia Gas of Kentucky, Inc. submits a request for an extension of time to complete the replacement of meters as part of its meter sampling program.

In Case No. 2000-00429, the Commission granted Columbia's request for approval of a permanent meter sampling program pursuant to 807 KAR 5:022 Section 8(5)(c). Pursuant to Columbia's approved program, Columbia files an annual report every March detailing the results of its meter testing and a plan to replace meters that have failed outside of the 2% tolerance zone prescribed in 807 KAR 5:022 Section 3, 2(a)(1).

In March 2020, Columbia submitted its plan to replace 1,918 meters that were part of the meter family that failed outside of the tolerance zone. The majority of these meters have "failed slow" meaning that the meter is reading less consumption than what the customers are actually consuming. Columbia has no safety concerns with these failed meters, but needs to replace them nonetheless. In accordance with its filed meter plan, Columbia began replacing the meters in January of 2020. Columbia, however, has recently fallen behind in replacing the meters because many customers are refusing to grant access to their homes because of COVID-19 concerns. Given Columbia's inability to gain access, Columbia is requesting an extension of time to complete the meter replacements.<sup>2</sup> Columbia cannot anticipate how long of an extension that it may need given the

<sup>&</sup>lt;sup>1</sup> 807 KAR 5:022 Section 3(4)(c) is the current applicable regulation.

<sup>&</sup>lt;sup>2</sup> If Columbia is not granted an extension, Columbia believes its only recourse would be to terminate service for failure to grant access.

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ongoing pandemic, however, will update the Commission as soon as Columbia can gain access on a more consistent basis.

If you have any questions, please don't hesitate to reach out to me at 614-202-5549 or Judy Cooper at 859-321-5804.

Sincerely,

MIMU E. Wancheck
Brooke F. Wancheck

**Assistant General Counsel** 

Enclosure(s)