

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 10, 2020

1. Refer to the application, SMRP Form 2.0, page 1. For the forecasted plant additions, retirements, and removals for 2021, provide the following separately by project:

- a. Location;
- b. Number, length, and size of mains and service lines;
- c. Associated costs;
- d. Projected construction start date;
- e. Projected month of completion;
- f. Type of material removed; and
- g. Explain in full detail the specific safety issue that each proposed project is addressing.

Response:

Please see Attachment A.

Project Name	Project ID	Location (Streets)	City	Facility to Install	Size(s) to Install (in)	Install Footage	Stations Retired	Proposed Material To Be Removed	Customer Service Replacements	Start Month	Completion Month	Safety Issue addressed	Main Cost	Service Replacement Cost	Proposed Blanket Estimate	Total Project Cost
Line DE ILI Project	20-71808	Cross Country	Multiple	Valves, fittings, and pipe to accommodate in-line inspection	12		0	Pipe, valves	NA	April	December	See prepared testimony				\$ 10,000,000
Highland Avenue High Pressure SMRP Optimain 2615117 18-0267767-00	18-53312	Highland Ave & East-West Connector ROW	Frankfort	Coated Steel High Pressure	8	3,401	0	3401' of bare steel pipe	0	July	November	This project addresses and eliminates high pressure bare steel pipe with mechanically jointed short barrel couplings located in proximity to other structures and a railroad crossing.	\$765,225	\$0		\$ 765,225
Martin Luther King Cast Iron SMRP OP# 2610568 JOB# 18-0268433-00 (LP PHASE) 20-0269812-00 (MP PHASE)	18-58813	ML King, 3rd St, 2nd St, Noble, Spruce	Lexington	Plastic medium density	2"/6"/8"	4,300	0	1632' bare steel 1713' cast iron 530' coated steel 463' plastic	32	January	July	This project eliminates cast iron pipe for the reasons stated in Columbia Case No. 2009-00141 & the reasons and commitments made in Columbia Case No. 2016-00162 as well as the guidance provided by PHMSA Advisory Bulletin ADB 2012-005.	\$1,204,000	\$135,648		\$ 1,339,648
South Limestone Cast Iron SMRP Optimain No. 2610571 JOB# 20-0269513-00	20-72224	S LIMESTONE ST, COLFAX, MOUNTMULLIN, PRALL	Lexington	Plastic medium density	2	6,400	0	1343' cast iron 1221' bare steel 1578' plastic 133' other 1578' plastic 3741' coated steel	41	February	September	This project eliminates cast iron pipe for the reasons stated in Columbia Case No. 2009-00141 & the reasons and commitments made in Columbia Case No. 2016-00162 as well as the guidance provided by PHMSA Advisory Bulletin ADB 2012-005.	\$992,000	\$173,799		\$ 1,165,799
SMRP - Walnut St., Maysville Optimain combo 2609686 JO# 20-0269730-00	20-74375	Forrest Ave., Commerce St., Reynolds Dr., Poplar St., Walnut St., Third St., Union St.	Maysville	Plastic medium density	2", 4"	10,500	2	4375' cast iron 4282' bare steel 295' wrought iron 38' other 2736' coated steel 1496' of plastic	145	March	November	This project eliminates cast iron pipe and two regulator stations for the reasons stated in Columbia Case No. 2009-00141 & the reasons and commitments made in Columbia Case No. 2016-00162 as well as the guidance provided by PHMSA Advisory Bulletin ADB 2012-005.	\$1,627,500	\$614,655		\$ 2,242,155
Maysville, 3rd St. Cast Iron Optimain Project 2610649 JO# 20-0269737-00 & 20-0269740-00	20-74435	3rd St., 4th st., Bridge St., Limestone St., Cherry Ally, Market St., Bugle Ally, Lexington Pk., Maddox Ave.	Maysville	Plastic medium density	2", 4", 8"	6,500	0	2898' bare steel 1867' cast iron 2149' plastic 1434' coated steel	125	January	August	This project eliminates cast iron pipe for the reasons stated in Columbia Case No. 2009-00141 & the reasons and commitments made in Columbia Case No. 2016-00162 as well as the guidance provided by PHMSA Advisory Bulletin ADB 2012-005.	\$1,007,500	\$529,875		\$ 1,537,375
South Ashland Ave. Cast Iron SMRP Optimain No. 2610585 JOB# 20-0269518-00	20-72245	S ASHLAND AVE	Lexington	Plastic medium density	2"	2,050	0	572' cast iron 1441' 1st generation plastic	49	February	April	This project eliminates cast iron pipe for the reasons stated in Columbia Case No. 2009-00141 & the reasons and commitments made in Columbia Case No. 2016-00162 as well as the guidance provided by PHMSA Advisory Bulletin ADB 2012-005.	\$389,500	\$207,711		\$ 597,211
Whittland Drive SMRP OP# 1625841 JOB# 20-0269711-00	20-74112	Whittland Drive, N Limestone, Glenn Place	Lexington	Plastic medium density	2"/4"	3,300	0	2477' Bare Steel 258' Plastic 34' Other	72	April	July	This project addresses an emerging problem for operations with corrosion on bare steel pipe that is reported to range in condition from fair to poor with a range of surface pitting. This project addresses leakage that has spread within dead vegetation.	\$511,500	\$305,208		\$ 816,708
Wallace SMRP 2532267 20-0269537-00	20-72361	Wallace Ave, Montgomery St, Hoge Ave, Chinn St, Adair St, Virginia St, Owenton Ave, Collins St, Murrel St, Wright St, Holmes St	Frankfort	Plastic medium density	2"/6"	9,560	1	4497' bare steel 1895' coated steel 1873' plastic	162	January	August	This project addresses a high Optimain risk concentration with historic leaks reported to be mostly in poor condition and having deep pits often requiring multiple repair clamps. This project also eliminates one regulator station and pipe that has a propensity for Grade 1 and 2+ leaks.	\$1,481,800	\$686,718		\$ 2,168,518
Frankfort on Walnut from Plaza to Elkhorn-1634294 / 2610666 - 6688228F 20-0269539-00 20-0269540-00	20-72362	Walnut St, Grandview Dr, Elkhorn Dr, Greenhill Av, Thompson St, Versailles Rd	Frankfort	Plastic medium density	2,4	5,627	1	425 bare steel 2014 coated steel 3102' plastic	80	March	November	This project addresses the 7th highest area of risk concentration in Kentucky and eliminates poor performing pipe and one district regulator station.	\$872,185	\$339,120		\$ 1,211,305
Bath Ave SMRP - AORC Base 1626892 JO# 20-0269773-00	20-74824	29th St, 30th St, Bath Av, Broom St, Carter Av, Central Av, Hill St, Hermann Av, Chatteroi St	Ashland	Plastic medium density	2,4	15,300	0	3989' bare steel 3573' coated steel 8510' plastic	213	January	December	This project eliminates bare steel pipe that has a high concentration of leaks. It also has a relatively high area of risk concentration maximum risk score.	\$2,371,500	\$902,907		\$ 3,274,407
Frankfort 2nd Street Relocation 19-0268568-00	1960737	Battle, Bridge, Capitol, Conway, Ewing, Logan, Riverview, Second, Shaw, State, Third, and Webber	Frankfort	Plastic medium density	2,4	3,659	0	2663' bare steel 859' coated steel 2003' plastic	42	January	April	This project is being worked in conjunction with a public improvement project to eliminate bare steel pipe having a high concentration of leaks. This project contains the third and fourth highest areas of risk concentration in the state.	\$567,145	\$178,038		\$ 745,183
Newtown Nanner Horse Farm Replacement 19-0268985-00	19-66929	Right of Way	Versailles	Coated Steel High Pressure	12	5,800	0	5800 feet of bare steel pipe	3	May	September	This replacement project addresses mechanically coupled high pressure, bare steel pipe installed in the 1920s. The leak repair reports indicate the pipe is in poor condition and has deep pits.	\$1,592,100	\$12,717		\$ 1,604,817
Blue Grass Ave. SMRP 1721689		Bluegrass Av, Highlawn AVE	Lexington	Plastic medium density	2	2,100	0	2100' Bare Steel		June	August	This project addresses a high risk single Optimain project that will be worked in conjunction with an LFUCG public improvement project. The project has the nineteenth highest area of risk concentration in the state.	\$325,500	\$0		\$ 325,500
Lick Branch Rd SMRP - 2610445 20-0269800-00	20-75034	Main St/HWY 40, Lick Branch Road	Inez	Medium Density plastic pipe	2"	600	0	600' Bare Steel	12			This project addresses corrosion issues on pipe that is under hard surface with some of the pipe located in proximity to buildings. The pipe has a history of Grade 1 leaks and the leak repairs interfere with access to businesses.	\$93,000	\$50,868		\$ 143,868
South Shore SMRP 2610306 Combo 2539827	2074025	West 2nd Ave, 4th, Center, Fifth, First, Fullerton, Hauser, Main, Riverside, Third	South Shore	Plastic medium density	2 & 4	7,000	0	4238' Bare Steel 3985 coated steel 1276 plastic	34	January	October	This project addresses an emerging problem with an increased number of main line leaks often resulting in emergency repairs.	\$1,085,000	\$144,126		\$ 1,229,126

Project Name	Project ID	Location (Streets)	City	Facility to Install	Size(s) to Install (in)	Install Footage	Stations Retired	Proposed Material To Be Removed	Customer Service Replacements	Start Month	Completion Month	Safety Issue addressed	Main Cost	Service Replacement Cost	Proposed Blanket Estimate	Total Project Cost
Chenault Road SMRP OP# 2610569 JOB# 20-0269763-00	20-74695	Chenault, Cross, Hart, Romany, Louisiana	Lexington	Medium Density plastic pipe	4,2	6,000	0	8191' bare steel 925' plastic 10' coated steel	150	March	October	This project addresses the fourth highest area of risk concentration in the state. The pipe has a history of water infiltration and freeze offs.	\$930,000	\$635,850		\$ 1,565,850
Louisa on Lackey from Sycamore ST to Carter-1722573 & 2434522: COMBO 2610708	19-68538	Lackey Ave, Hwy 23.	Louisa	Medium Density plastic pipe	4	1,344	0	2795 bare steel 1879 coated steel 680 plastic	20	April	June	This project addresses poor performing pipe under hard surface in proximity to a railroad. The project area has experienced water infiltration issues.	\$208,320	\$84,780		\$ 293,100
Clays Mill Road Phase III; COMBO 2608045	20-69446	Clays Mill Rd fm Stratford to Harrodsburg Rd + Blue Ash, Reed, & Woodbine and portions of Rosemont Garden, Lane Allen, Southland Dr, and Lafayette Parkway	Lexington	Medium density plastic and coated steel	8, 6, 4, 2	18,500	1	12654' bare steel 575' coated steel 2593' plastic	175	January	December	This project addresses bare steel pipe with a high concentration of leaks in a very busy traffic corridor. It is being worked in conjunction with a public improvement project.	\$2,867,500			\$ 3,500,000
Dyarsd Hill SMRP - AORC Base 1869082: Combo 2598445	19-63196	Dyarsd Hill Dr, Prospect Ave	Ashland	Medium Density plastic pipe	2 & 4	1,200	0	653' Bare Steel 282' plastic 421 coated steel	6	April	June	This project addresses the tenth highest area of risk concentration in Optimain with the bare steel pipe reported to be in poor condition and having deep pits in the surface of the pipe. This project addresses leakage and the resulting migration of gas. This project contains pipe installed in the 1920s in proximity to structures.	\$186,000	\$25,434		\$ 211,434
Lexington on Tremont from Ashland to Beaumont - 1636357 Job Order No. 20-0269771-00	20-74813	Eldemere, Kastle Rd, Melrose, Tremont Av, Mt. Vernon	Lexington	Medium Density plastic pipe	4,2	7,100	0	9142' Bare 1350' coated steel 731' plastic 34' other	150	April	November	This project will allow future retirement of the Marquis And Cooper pit regulator stations while also eliminating the bare steel medium pressure pipe located on the UK practice facility.	\$1,100,500	\$635,850		\$ 1,736,350
Colby RD HP SMRP JOB# 20-0269641-00	20-73598	Colby Road	Winchester	Coated Steel High Pressure	12	1,500	0	1500' of bare steel pipe	9	January	March	This project addresses 1920's vintage mechanically joined high pressure bare steel pipe.	\$285,000	\$38,151		\$ 323,152
Ashland on Frederick from Blackburn to North - 1629113 JO# 20-0269775-00	20-74825	Blackburn, North, Frederick St	Ashland	Medium Density plastic pipe	4,6,8	4,850	0	3782' bare steel 421' coated steel 282' plastic	43	May	November	This project addresses the 32 highest area of risk concentration around Blackburn Avenue.	\$751,750	\$182,277		\$ 934,027
Ashland on Harrison from 6TH to Craft -1620324 JO# 20-0269781-00	20-74850	McGuire St., Cedar St., Cherry St., 6th St., Barbar Rd., Long St., Harrison St., Perry St., Pollard Rd.	Ashland	Medium Density plastic pipe	2,4	9,150	0	2549' bare steel 5880' plastic	80	March	November	This project eliminates poor performing pipelines and addresses the 35th highest area of risk concentration in the state.	\$1,418,250	\$339,120		\$ 1,757,370
Hindman on Owens Branch from Short Branch to Owens Branch & Stewart Fork-1621622 JO# 19-0268829-00	19-65023	Hwy 80, Short Branch & Owens Branch	Hindman	Medium Density plastic pipe	2,4	10,400	0	7544' bare steel 2457' coated steel 1331' plastic	50	March	November	This project addresses bare steel pipe and the 59th highest area of risk concentration in the state.	\$1,612,000	\$211,950		\$ 1,823,950
Manhattan Drive SMRP Optimain No. 1638839 Job Order No. 20-0269752-00	20-74609	MANHATTAN DRIVE, BRYAN STATION	Lexington	Medium Density plastic pipe	4	3,100	0	1820' bare steel	40	April	June	This project addresses bare steel pipe whose replacement is necessary to facilitate a future retirement of a regulator station with access and age and condition issues. The leak repair reports indicate the pipe is mostly in poor condition with a propensity to Grade 1 and 2+ leaks requiring multiple repair clamps.	\$480,500	\$169,560		\$ 650,061
Main St Irvine SMRP - 2610566 20-0269816-00	20-75191	Carhartt, Main, Park, Covey, Collins,	Irvine	Medium Density plastic pipe	6,4,2	8,500	2	4779' bare steel 152' galvanized 4307' coated steel 5586' plastic	115	February	November	This project addresses bare steel pipe whose leak repair reports indicate the pipe has deep pits and generalized corrosion affecting the servicability of the pipe. Water infiltration has been a historic problem that will be eliminated in this area with this work.	\$1,317,500	\$487,485		\$ 1,804,985
Paris Cast Iron - 2610525 20-0269806-00	20-75121	Walkers, Williams, 8th Street, Cypress, Henderson, and Higgins	Paris	Medium Density Plastic Pipe	2,6	18,000	4	5268 cast iron 12651 bare steel 4358 coated steel 5064 plastic	321	January	December	This project eliminates cast iron pipe and four regulator stations for the reasons stated in Columbia Case No. 2009-00141 & the reasons and commitments made in Columbia Case No. 2016-00162 as well as the guidance provided by PHMSA Advisory Bulletin ADB 2012-005.	\$2,790,000	\$1,360,719		\$ 4,150,719
High Street Relocation - 2590287 20-0269473-00	20-71641	High St	Paris	Medium Density Plastic Pipe	2	5,000	0	Cast Iron and Bare Steel	66	January	August	This project eliminates cast iron pipe for the reasons stated in Columbia Case No. 2009-00141 & the reasons and commitments made in Columbia Case No. 2016-00162 as well as the guidance provided by PHMSA Advisory Bulletin ADB 2012-005. It will also be worked in conjunction with a public improvement project.	\$775,000	\$279,774		\$ 1,054,774
East Main Street SMRP 2615106 20-0269499-00	20-72092	East Main Street	Mount Sterling	Medium Density Plastic Pipe	4	1,100	0	916' bare steel	4	January	March	This project addresses an unrepairable leak under a bridge and brings a new medium pressure trunk line into town so that future bare steel low-pressure replacements may be achieved with smaller diameter higher pressure pipe.	\$170,500	\$16,956		\$ 187,456
Southland Drive Replacement		Southland Drive	Lexington	Medium Density plastic pipe	4	1,200	0	1200' bare steel		February	April	This project is necessary to address water infiltration into the main and service interruptions.	\$186,000	\$0		\$ 186,000
Devonia Replacement		Devonia	Lexington	Medium Density plastic pipe	4	1,200	0	1200' bare steel		April	June	This project is necessary to address water infiltration into the main and service interruptions.	\$185,807	\$0		\$ 185,807
Scattered Services	Multiple	Multiple	Multiple	Medium Density Plastic Pipe				Leaking bare steel service lines	80	January	December	This project addresses leaking bare steel services to eliminate migration of gas in proximity to structures.		\$339,120		\$ 339,120
579 - Blanket Meter Install Replacement	Multiple	Multiple	Multiple	Meter Attachments	NA	0		Retired Meter Setting Components	NA	January	December	Necessary for the customer to be connected to the new main			\$59,000	\$ 59,000

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581 - House Regulators Replacement	Multiple	Multi	Multiple	Service Regulators	Na	NA	0	Retired House Regulators	NA	January	December	Necessary for the customer to be connected to the new main			\$70,000	\$ 70,000
Last Line - Do not Enter Data																
Sub Totals:						184,241	11		2,319							\$ 50,000,000

COLUMBIA GAS OF KENTUCKY, INC.
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DATED NOVEMBER 10, 2020

2. Refer to SMRP Form 2.0, page 1.

a. Explain why Columbia Kentucky did not use a 13-month average of net plant during the forecasted period to calculate the Safety Modifications and Replacement Program (SMRP) rate base.

b. Confirm that calculating the SMRP rates based on the ending period plant balances, allows Columbia Kentucky to earn a return on capital expenditures that will not yet have been made. If this cannot be confirmed, explain each basis for the response.

c. Provide a revised SMRP rate calculation that uses a 13-month average rate base during the forecasted period. Provide an electronic copy in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible, including the calculation of the 13-month average rate base.

Response:

- a. Columbia used a period ending balance at December 31, 2021 consistent with Commission precedent in its previously approved SMRP/AMRP filings. The Commission authorized a forward looking test year for its SMRP (previously its AMRP) in Case No. 2013-00167. Columbia first used a period ending balance in calculation of its AMRP in Case No. 2014-00366. Columbia continued to use this

methodology with Commission approval in Case Nos. 2015-00342, 2016-00162, 2017-00413, 2018-00341, and 2019-00383. Columbia has not been required to use a 13-month average of net plant previously.

- b. Columbia can confirm that by using the ending period plant balance Columbia would initially be earning a return on capital expenditures that have not yet been made. The revenue requirement that is allowed on SMRP projects in a project calendar year is collected over the same twelve-month period. Due to the fact that SMRP is billed as a fixed charge, Columbia may experience an over-collection of SMRP revenue in the beginning of the calendar year which will then become ebb and flow with the construction season as capital investments are made. Any over or under collection of the SMRP revenue for the current calendar year is recovered through the SMRP balancing adjustment in the following year.
- c. Please see the attachment for a revised SMRP rate calculation using a 13-month average rate base for the forecasted period ended December 31, 2021.

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3. Refer to SMRP Form 2.0, page 1, and Case No. 2019-00383¹, SMRP Form 2.0, page 1. Reconcile the 2020 ending plant balances and the 2021 beginning plant balances.

Response:

The 2020 ending plant balances in Case No. 2019-00383, SMRP, Form 2.0, page 1, do not tie to the 2021 beginning plant balances in SMRP Form 2.0, page 1, as expected. The primary driver of this will be the plant data provided in Case No. 2019-00383, for calendar year 2019, was based on estimated plant data. In the current filing, the calendar year 2019 amounts were updated with actual plant data as recorded by the Company. The actual plant data through calendar year 2019 was approved in Case No. 2020-00099.

In addition to updating plant data from estimate to actual for 2019 calendar year, there were changes to the allocation of 2020 estimated plant. While the total 2020

¹ Case No. 2019-00383, *2020 Safety Modification and Replacement Program Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC Dec. 20, 2019).

estimated plant additions remained the same, the allocation between Gas Plant Accounts was changed to better reflect current year estimates. As a result of this change in estimated 2020 allocations, the annual retirements and cost of removal were updated for 2020 calendar year.

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4. Provide an electronic copy of the application schedules in Excel spreadsheet format with all formulas intact and cells unprotected.

Response:

Please see the attachment for the Excel version of the application.

**COLUMBIA GAS OF KENTUCKY, INC.
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5. Refer to the Direct Testimony of David Roy, pages 13–14.

a. By account number for the last three years, provide the annual costs associated with direct assessment.

b. Confirm that Columba Kentucky would no longer incur costs associated with direct assessment if the in-line inspection is utilized. If this cannot be confirmed, explain.

Response:

- a. Columbia operates only two transmission lines (Line DE and T-4) on which it performs direct assessment ("DA"). Line DE requires significantly more attention due to the difference in lengths (53.3 versus 2.4 miles, respectively). Over the last three years, Columbia has performed DA in only one year (2019). In 2019, Columbia performed DA at three locations on Line DE costing roughly \$108,066. \$94,621 was charged to FERC account 887 while \$13,445 was charged to FERC account 889. A total of 5,959 feet of Line DE was direct assessed for that cost.

b. Columbia does not expect to perform DA for Line DE going forward and therefore, should not incur expenses related to DA for Line DE. Columbia currently plans to continue to use DA to perform assessments on the T-4 line at required intervals per its Transmission Integrity Management Plan (“TIMP”) because it isn’t capable of being assessed by ILI technology.

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6. Refer to the Direct Testimony of Gary Sullivan, page 14. Provide the estimated annual operating and maintenance expenses associated with in-line inspections. Explain whether Columbia Kentucky proposes to include these expenses in the SMRP.

Response:

Columbia estimates the assessment costs of the in-line inspections ("ILI") to be between \$265,000 and \$300,000 every seven years depending on the tool technology chosen, filtration needs, and need for 3rd party support. The first ILI assessment when a line is made capable of passing the ILI tool is typically capitalized since it's considered part of the commissioning process to ensure everything works as planned. The capital cost of this first assessment will be included in the SMRP filing for 2022 program costs, but most expenses after that will be O&M and not included in the SMRP.

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7. Confirm that adding the in-line inspection retrofit project will not delay the main replacement program.

Response:

Columbia has developed and adopted a safety management system ("SMS") based on API's recommended practice 1173 as our operating model. An attribute of that model is the continuous assessment of threats and risks on our pipeline system. Columbia's main replacement program is on pace to be completed as planned. However, Columbia will continue to evaluate other threats and risks, as well, to ensure the ongoing safe, reliable delivery of natural gas to our customers.

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8. Refer to Case No. 2009-00141,¹ Direct Testimony of David E. Mueller, page 8, and Case No. 2019-00257,² Direct Testimony of Gary Sullivan, page 15. Provide a comparison of the original estimate of the projects included in the SMRP with those completed and with those yet to be completed.

Response:

In 2008, Columbia estimated the then total cost of projects associated with the 30 year Accelerated Main Replacement Program to be \$210 million. By the end of 2020, Columbia will have spent approximately \$224 million and retired 199 miles of bare steel

¹ Case No. 2009-00141, *Application of Columbia Gas of Kentucky, Inc. for an Adjustment in Rates* (Ky. PSC Oct. 26, 2009).

² Case No. 2019-00257, *Electronic Application of Columbia Gas of Kentucky, Inc. for: 1) a Declaration that Construction of a Low Pressure System Safety Improvement is an Extension of Its System in the Ordinary Course of Business; 2) in the Alternative, for the Issuance of a Certificate of Public Convenience and Necessity for Such Construction; 3) Approval of an Amendment and Expansion of Its Accelerated Main Replacement Tariff to Its Safety Modification and Replacement Tariff; and 4) Approval to Modify the 2019 AMRP Construction Plan* (Ky. PSC Nov. 7, 2019).

and cast iron pipe. Columbia will have approximately 326 miles of priority pipe yet to retire as part of the program. The total cost of the projects yet to be completed requires a study that has not been performed. Columbia anticipates having all the cast iron pipe removed from the system by the end of December 2022 and the remainder of the bare steel eliminated by the end of 2037.

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9. State whether the expenses involved in Columbia Kentucky's corrective actions in connection with the incidents of customer outages on May 8, 2020, April 16, 2020, and June 4, 2020,¹ were included in the SMRP and provide an itemized list of those expenses.

Response:

Columbia presumes "corrective actions" means the acts of restoring its system and service to those impacted from the temporary loss of service due to an incident. The expenses for restoring service in connection with the customer outages on March 8th and April 16th are not included in the SMRP. The outage that occurred on June 4th was on a system that was already under construction. That construction project was always intended to be part of our SMRP filing. Instead of restoring customers with our typical process, Columbia chose to go ahead and replace the customer services and tie over to

¹ *Pipeline Safety Branch Customer Outage Report*, an outage involving 132 customers in Harrison County, Ky. (filed Mar. 8, 2020); *Pipeline Safety Branch Customer Outage Report*, an outage involving 222 customers in Greenup County, Ky. (filed Apr. 16, 2020); *Pipeline Safety Branch Customer Outage Report*, an outage involving 25 customers in Bourbon County, Ky. (filed June 4, 2020).

19-0268978-00
 as of 11/19/2020

Sum of Amount Row Labels	Column Labels												Grand Total
	201912	202001	202002	202003	202004	202005	202006	202007	202008	202009	202010	202011	
1000 - Hourly Labor - Overtime						\$ 673.38	\$ 2,408.93	\$ 802.23	\$ 1,511.86	\$ 953.22	\$ 2,637.01		\$ 8,986.63
1003 - Regular Pay - Productive	\$ 409.26	\$ 14,232.19	\$ 21,502.49	\$ 17,042.85	\$ 10,693.03	\$ 3,085.77	\$ 5,272.83	\$ 5,826.63	\$ 6,849.39	\$ 3,483.75	\$ 6,920.61		\$ 95,318.80
1006 - Vacation	\$ 40.07	\$ 1,423.18	\$ 2,150.33	\$ 1,704.33	\$ 1,069.27	\$ 375.93	\$ 321.97	\$ 589.33	\$ 426.08	\$ 539.35	\$ 650.25		\$ 9,290.09
1007 - Non Productive	\$ 93.91	\$ 1,979.05	\$ 2,029.99	\$ 1,328.64	\$ 664.01	\$ 184.51	\$ 337.65	\$ 799.01	\$ 598.06	\$ 476.64	\$ 978.17		\$ 9,469.64
2017 - Other Materials and Supplies	\$ 4,331.78	\$ 21,357.04		\$ 666.38							\$ (1,955.83)		\$ 24,399.37
2203 - Other Gas Materials and Equip											\$ 1,385.66		\$ 1,385.66
3004 - Constructions Services												\$ 7,762.00	\$ 7,762.00
3080 - Cap Proj not Othrwse Identifd		\$ 3,935.15	\$ 9,068.14	\$ 7,847.18	\$ 1,952.68	\$ 2,290.56	\$ 5,762.60	\$ 3,706.75	\$ 1,211.10		\$ 1,481.28	\$ 1,145.28	\$ 38,400.72
3086 - Main Line Install Svcs-Dist		\$ 191,103.24	\$ 160,877.53	\$ 278,916.12	\$ 77,130.11		\$ 1,797.88	\$ 1,077.46	\$ 7,524.23		\$ 117,023.20	\$ 28,261.53	\$ 863,711.30
3091 - Reconnect Service Lines-Dist	\$ 1,066.33		\$ 8,255.66	\$ 4,691.30		\$ 938.26	\$ 8,980.49	\$ 3,474.84					\$ 27,406.88
3092 - Paving Restoration Svcs-Dist						\$ 49,645.08		\$ 66,400.53	\$ 679,685.14		\$ 10,074.42		\$ 805,805.17
3600 - Fees Licenses and Permits								\$ 7,800.00					\$ 7,800.00
4015 - Workers Compensation	\$ 4.55	\$ 142.44	\$ 228.65	\$ 176.08	\$ 108.11	\$ 41.69	\$ 81.61	\$ 130.05	\$ 245.65	\$ 100.25	\$ 195.36		\$ 1,454.44
4503 - AFUDC_IDC - Debt	\$ 7.05	\$ 302.57	\$ 848.45	\$ 1,389.53	\$ 1,983.34	\$ (533.33)							\$ 3,997.61
4504 - AFUDC_IDC - Equity	\$ 5.88	\$ 252.53	\$ 708.15	\$ 1,159.77	\$ 1,655.39	\$ (1,542.04)							\$ 2,239.68
4506 - Construction Ovrhead - AG_SE	\$ 498.24	\$ 29,854.45	\$ 26,639.36	\$ 39,522.29	\$ 11,767.41	\$ 7,860.34	\$ 3,808.98	\$ 12,776.30	\$ 94,066.48	\$ 1,018.71	\$ 17,976.47		\$ 245,789.03
4533 - PP Man Acc Excl Int_OH		\$ 29,909.07	\$ (13,528.89)	\$ (1,613.24)	\$ (14,766.94)	\$ 1,050.26	\$ (1,050.26)	\$ 231,404.91	\$ (231,404.91)	\$ -	\$ 1,145.28	\$ (1,145.28)	\$ -
5020 - Vehicle Maintenance	\$ 85.67	\$ 1,319.86	\$ 1,408.06	\$ 2,828.26	\$ 478.50	\$ 348.32	\$ 533.73	\$ 797.70	\$ 1,034.41	\$ 604.98	\$ 1,075.64		\$ 10,515.13
5030 - Truck Maintenance		\$ 2,901.04	\$ 1,708.03		\$ 106.94		\$ 480.84	\$ 1,783.60	\$ 97.21	\$ 49.35	\$ 77.96		\$ 7,204.97
9005 - Pension-Qualified	\$ 10.64	\$ 352.53	\$ 566.59	\$ 436.19	\$ 267.91	\$ 103.28	\$ 201.70	\$ 192.31	\$ 216.31	\$ 133.95	\$ 270.60		\$ 2,752.01
9007 - 401K Plan	\$ 30.41	\$ 480.65	\$ 1,035.47	\$ 1,201.49	\$ 588.75	\$ 214.47	\$ 424.20	\$ 401.62	\$ 452.05	\$ 327.80	\$ 518.78		\$ 5,675.69
9011 - OPEB - Medical	\$ 2.34	\$ 92.57	\$ 148.50	\$ 114.24	\$ 70.16	\$ 27.07	\$ 52.96	\$ 50.43	\$ 56.66	\$ 31.60	\$ 63.52		\$ 710.05
9022 - Medical - Active	\$ 46.03	\$ 2,007.84	\$ 5,280.76	\$ 2,444.82	\$ 1,650.38	\$ 443.13	\$ 1,136.95	\$ 872.85	\$ 1,450.35	\$ 528.04	\$ 1,584.53		\$ 17,445.68
9025 - OPEB - Life	\$ 0.14	\$ 5.41	\$ 8.41	\$ 6.60	\$ 3.96	\$ 1.46	\$ 2.93	\$ 2.77	\$ 3.65	\$ 1.69	\$ 3.62		\$ 40.64
9629 - State and Local Tax Other	\$ 37.72	\$ 1,386.92	\$ 2,311.52	\$ 1,914.93	\$ 886.18	\$ 286.37	\$ 627.92	\$ 637.43	\$ 626.48	\$ 371.69	\$ 826.94		\$ 9,914.10
Grand Total	\$ 6,670.02	\$ 303,037.73	\$ 231,247.20	\$ 361,777.76	\$ 96,309.19	\$ 65,494.51	\$ 31,183.91	\$ 339,526.75	\$ 564,650.20	\$ 8,621.02	\$ 162,933.47	\$ 36,023.53	\$ 2,207,475.29

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 10, 2020

10. Provide the results of the testing performed on the automatic shut-off valves (ASV) in the March 8, 2020 and April 16, 2020 outages.

Response:

Columbia has not yet received the test results from the manufacturer on the specified ASV's.

the new main. This would have been done anyway. Columbia then abandoned the station that caused the outage as we were planning to. The capital charges to replace the services and abandon the station are included in the SMRP. Because the work performed to restore customers service was already intended to be charged to the project, there was nothing coded to delineate that work and the work of the rest of the project. The cost detail provided is a breakdown of the entire cost of that project as of 11/19/20.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 10, 2020

11. Provide a list of all outages involving ASVs since Columbia Kentucky began Phase I of the LP Program, include the expense of resolving each outage.

Response:

There have been three customer outages that have involved ASV's since the Commission's approval of Phase 1 of the LP program. The dates locations and costs are shown below:

1. March 8, 2020, Cynthiana – Approximate Cost of \$15,817
2. April 16, 2020, Raceland – Approximate Cost of \$28,186
3. June 4, 2020, Paris – Cost cannot be determined*

* There was an ongoing SMRP main replacement program project well underway in Paris when the outage occurred. Instead of performing normal restoration protocol the decision was made to go ahead and run new services lines for the

customers who were out of service. The new services were connected to the recently installed gas main. All of this was planned to be completed anyway in the very near future. No additional costs were incurred and the costs to perform this work are all lumped in to the work order for the overall project.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 10, 2020

12. State whether the expenses in item 11 were included in the SMRP.

Response:

As stated in responses to questions 9 and 11, the costs to restore service for the outage in Paris on June 4th is included in the 2020 SMRP as part of a larger main replacement project that was already well underway. All costs will be trued up in the March 2021 filing. No other costs associated with outages are included in the SMRP.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 10, 2020

13. Provide a detailed list of all redesigns, upgrades, or reconfigurations Columbia Kentucky has identified as necessary in conjunction with the installation of ASVs, but has not yet completed.

Response:

The only redesign/upgrade/reconfiguration of a station after an ASV has been installed is one planned at the station causing the Raceland outage on April 16. This station is number 1311 and is located at the corner of Vine St. and Pond Run Road. Columbia is redesigning the station due to significant vibration caused from nearby train tracks. The vibrations are a potential cause for the ASV activating and causing the outage.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 10, 2020

14. State whether the expense associated with Item 13 will be included in the SMRP.

Response:

The costs associated with the redesign in item 13 is not included in the SMRP.