COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA)	
NATURAL GAS COMPANY, INC. FOR A)	
CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY TO) CASE NO.	2022-00085
CONSTRUCT A PIPELINE TO SERVE)	
THE CITIES OF NICHOLASVILLE AND)	
WILMORE)	

TESTIMONY OF JONATHAN MORPHEW DIRECTOR OF OPERATIONS DELTA NATURAL GAS COMPANY, INC.

Filed: March 25, 2022

1 <u>Background</u>

- 2 Q. Please state your name and business address.
- 3 A. My name is Jonathan Morphew. My business address is 3617 Lexington Road, Winchester,
- 4 Kentucky 40391.
- 5 Q. By whom are you employed and in what capacity?
- 6 A. I am employed by Delta Natural Gas Company, Inc. ("Delta") as its Director of Operations.
- 7 Q. Please briefly describe your professional history with Delta.
- 8 A. My career with Delta dates back to 1987, when I began as an SR Engineering Technician.
- 9 I was promoted to Lead Engineer in 1989 and Director Engineering in 1995. In 2003, I
- was promoted to Manager Engineering with oversight over the Corrosion and
- 11 Measurement & Regulation departments. In 2016, I was promoted to SR Manager –
- Distribution and managed the Engineering, Construction, Corrosion, Measurement &
- Regulation, and Distribution departments. I was promoted to Delta's Vice President –
- Operations in 2018 with oversight over Delta's Engineering, Construction, Corrosion,
- Measurement & Regulation, Distribution, Transmission, and Safety Operations. Effective
- May 1, 2021, my title changed to Director of Operations. My responsibilities as Director
- of Operations remain the same as they were when I served as Vice President Operations.
- 18 Q. Please briefly describe your educational background.
- 19 A. I attended Morehead State University and received a Bachelor of Science degree in
- Industrial Technology in 1985. I was employed by Nucor Steel in Grapeland, Texas and
- 21 Palmer Engineering in Winchester, Kentucky before beginning my career at Delta in 1987.
- 22 Q. Have you previously testified before this Commission?
- 23 A. Yes. I presented testimony before the Kentucky Public Service Commission
- 24 ("Commission") in Delta's recent base rate case, Case No. 2021-00185.

Q. What is the purpose of your testimony?

- 2 A. My testimony describes and supports Delta's request for a Certificate of Public
- 3 Convenience and Necessity ("CPCN") for construction of a pipeline that will provide the
- 4 Nicholasville and Wilmore portions of Delta's system with necessary redundancy and
- 5 capacity.

- 6 Q. Please describe the CPCN Delta is requesting in this proceeding.
- 7 A. Delta is requesting a CPCN to construct an 8-inch steel transmission pipeline that is
- 8 approximately 17 miles in length. The pipeline will serve the Nicholasville and Wilmore
- 9 distribution areas. The Nicholasville and Wilmore system serves approximately 9,100
- 10 customers and is the largest and most concentrated area of service in Delta's system.
- 11 Q. Is this the same project for which Delta requested a CPCN in Case No. 2021-00185?
- 12 A. Yes. In Delta's recent rate case, Delta requested the CPCN and in doing so, requested a
- deviation from the filing requirements that require engineering plans and drawings because
- it considered it financially prudent to wait to engineer the line until a CPCN was granted.
- On October 18, 2021, the Commission issued an order denying Delta's request for a
- deviation from the CPCN requirements. Delta informed the Commission that it was
- withdrawing its request for the CPCN in Case No. 2021-00185 and that it planned to file a
- new application for the CPCN in the first quarter of 2022.
- 19 Q. Is the pipeline necessary for the same reasons you described in your testimony in Case
- 20 **No. 2021-00185?**
- 21 A. Yes. The need for the pipeline is twofold: redundancy and capacity. First, the
- Nicholasville and Wilmore areas are currently served only by Delta's Nicholasville
- Transmission Line, which delivers high pressure natural gas from Buckeye in Garrard

County to the south side of Nicholasville in Jessamine County. This pipeline is 12 miles in length and lies predominantly in rural areas, which includes crossing the Kentucky River. If this pipeline experiences a failure, there is no redundancy in the area and the more than 9,000 customers in that area could lose gas service. There is no other area in Delta's service territory where so many customers are served from a single line.

With the increased construction of housing and other economic development in Jessamine County, Delta is especially concerned about the redundancy in the Nicholasville system. This brings me to the second reason why the project is necessary. As Jessamine County has grown, there is an increasing need for volume and pressure on the north side of the system at the Fayette County line. Nicholasville has also experienced minor capacity constraints and a bottleneck in the system. To address this bottleneck, Delta considered a project in Nicholasville to replace and upgrade lines at an approximate cost of \$1 million. Delta will be able to avoid this project and cost if it builds the proposed pipeline.

Once completed, the proposed pipeline will supply natural gas from a separate provider. With this secondary supply, there will be a significant enhancement in the reliability of supply as the area continues to grow while simultaneously eliminating any operational concerns should there be a failure in supply from either supplier. Because this pipeline is necessary to secure the integrity of the Nicholasville and Wilmore systems and support further growth in Jessamine County, Delta requests the Commission grant it a CPCN to construct the pipeline.

Q. In addition to providing needed redundancy and capacity, are there any other potential benefits of the pipeline?

- 1 A. Yes. At times, natural gas pricing is different between interstate gas providers. The new pipeline Delta plans to construct will tap an interstate gas pipeline and provide Delta with more options in arranging its supply portfolio to deliver the lowest possible price of gas to its customers.
- 5 Q. Please describe Delta's process to obtain plans and drawings for the pipeline.
- A. Delta had originally planned to engineer the pipeline in-house. Given the great need for the pipeline, Delta sought bids from engineering firms for plans and drawings for the pipeline one day after Delta received the Commission's order denying Delta's deviation request. On November 2, 2021, Delta awarded the project to EnSite USA. EnSite USA has prepared the map, plans, and drawings for the project, which are attached to my testimony as Exhibit JM-1.
- 12 Q. Please describe the proposed route of the proposed pipeline.
- A. Delta plans to tap into an interstate pipeline and run the pipeline approximately 17 miles to connect to the Nicholasville system from the east/southeast direction. As shown on Exhibit

 JM-1, the map and plans provide details of the proposed route.
- 16 Q. Is it possible that the route for the pipeline could change?
- 17 A. Yes, because Delta has not completed field verifications. As the properties are surveyed
 18 and necessary testing is performed, Delta may determine that some properties are not
 19 suitable for construction or minor deviations are required. Thus, it is possible that the route
 20 could change slightly and Delta could cross properties not included on the preliminary
 21 plans.
- 22 Q. What is the timeline for this project?

- 1 A. Delta expects to begin construction in 2023. Delta hopes to complete the pipeline by the end of the construction season in 2024.
- Q. Delta stated in Case No. 2021-00185 that it expects to acquire right-of-way for the project in 2022. Does Delta still plan to do so?
- The Company is awaiting the Commission's grant of a CPCN before performing additional planning of the project. Thus, whether Delta acquires right-of-way for the project in 2022 depends on the timing of the approval of the CPCN and other utility priorities at that time.

 When the CPCN is approved, other projects may be underway that would necessitate delaying the commencement of right-of-way acquisition work until 2023.

10 Q. Did Delta consider alternatives instead of the proposed pipeline?

Yes. Delta has been concerned about the need for redundancy and additional capacity in Nicholasville for several years. As a result of these concerns, Delta extensively researched other avenues of providing an additional natural gas supply to the area. Delta first approached two natural gas companies in relatively close proximity to the area and inquired about the possibility of tapping in to those systems to procure an additional natural gas supply. These attempts were not successful. Both natural gas companies cited supply constraints when justifying their conclusion, which further highlights the need for a new high pressure natural gas line for the region. The proposed pipeline for which Delta is seeking the CPCN is the best and least cost option.

Q. What is the cost of this project?

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¹ See Case No. 2021-00185, Delta's Response to Commission Staff's Second Request for Information, Question No. 18; Delta's Response to Commission Staff's Third Request for Information, Question No. 9.

² *Id*.

- 1 A. At this time, Delta estimates the project will cost approximately \$19,127,805. Attached to
 2 my testimony as Exhibit JM-2 is a detailed preliminary cost estimate for the project.
- 3 Q. Please describe the right-of-way Delta plans to acquire for the pipeline.
- A. Delta plans to acquire all right-of-way in easement, except for the purchase station lot which may be purchased in fee. Delta will utilize EnSite USA for assistance in the right-of-way acquisition process. Delta will not begin acquiring right of way until a CPCN is obtained.
- 8 Q. Will the properties the pipeline crosses have the option to receive gas service?
- 9 A. Yes. Properties the pipeline crosses will have the option to tap onto the line and receive gas service as Delta customers.
- 11 Q. Please describe the estimated annual cost of operation of the pipeline.

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Delta estimates the annual cost of operation of the pipeline will be \$16,050. The estimated annual cost of operation does not include depreciation, property tax expense, insurance, and financing expenses. The majority of this cost is due to right-of-way mowing and maintenance. The pipeline will be constructed and maintained using a right-of-way of approximately 40 feet in width. Delta must maintain the right-of-way so that the pipeline is accessible at all times in case of an emergency. Maintenance includes mowing and general vegetation removal, which is performed every two to three years depending on vegetation growth.

Additionally, Delta will patrol the entire right-of-way twice annually to ensure the pipeline and associated operations meet all safety compliance requirements. All regulatory stations and above ground valves will be inspected annually to ensure proper condition and

operation. Delta will also perform and document cathodic testing and inspection annually,
which requires electric service.

To summarize, Delta estimates it will incur the following annual operational expenses for the pipeline:

- Right-of-way mowing/maintenance: \$11,000
- Line patrol: \$1,300

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- 7 Leak survey: \$1,300
- Electric usage/rectifier operation: \$700
- Measurement and regulation operations: \$1,000
- Painting/miscellaneous maintenance: \$400
- Transmission valve inspection: \$350
- Each of these expenses helps ensure the safety of Delta's customers and employees.
- 13 Q. Please describe the manner in which the pipeline will be constructed.
 - A. This project will consist of the construction of a purchase station from an interstate pipeline located approximately 17 miles southeast of the City of Nicholasville. Delta plans to construct the pipeline using 8-inch steel pipe with 0.322-inch wall thickness. All pipe joining will be welded and non-destructively tested using x-ray technology. All pipe installed below ground will be coated in its entirety, and all welded joints will be coated upon completion of the welds for protection from corrosion. Additional cathodic protection will be provided by use of rectifier voltage being applied. All piping and associated facilities installed above ground will be painted in order to prohibit atmospheric corrosion. Upon the completion of construction, the pipeline will be hydrostatically tested to a minimum of 1,080 psi, rendering a 720 psi maximum allowable operating pressure.

All fittings associated with the pipeline will be pressure rated for 720 psi or greater. The construction process will predominately include open trench excavation, excluding main line valves which will be installed above ground to help ensure safety of operation and maintenance. All underground pipeline facilities will be installed at a minimum of 36 inches of cover unless state or federal codes require greater depth. All waterway crossings deemed "navigable" by the US Army Corps of Engineers will be horizontally directional drilled to prevent any environmental damages near or in the waterway. During and upon completion of the project, all right-of-way shall be restored to a minimum of original condition.

10 Q. Has Delta contacted the interstate pipeline company regarding the tap?

- 11 A. Yes. Delta has discussed the new tap with the interstate pipeline company, which is 12 amenable to Delta constructing a tap for the purpose of constructing the pipeline.
- 13 Q. Has Delta obtained any permits for this project?
- 14 A. Not at this time. Delta understands that the construction of this pipeline will require several
 15 permits and will obtain these permits when necessary. Should the Commission grant the
 16 CPCN, Delta will file copies of its permits with the Commission if requested to do so.
- 17 Q. Does this conclude your testimony?
- 18 A. Yes.

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VERIFICATION

COMMONWEALTH OF KENTUCKY

SS:

COUNTY OF CLARK

The undersigned, **Jonathan W. Morphew**, being duly sworn, deposes and says he is Director of Operations of Delta Natural Gas Company, Inc., that he has personal knowledge of the matters set forth in his testimony, and his testimony is true and correct to the best of his information, knowledge, and belief.

JONATHAN W. MORPHEW

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 15th day of March, 2022.

Notary Public

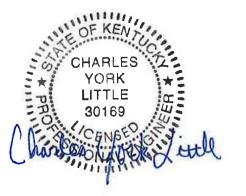
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My Commission Expires:

12-15-25

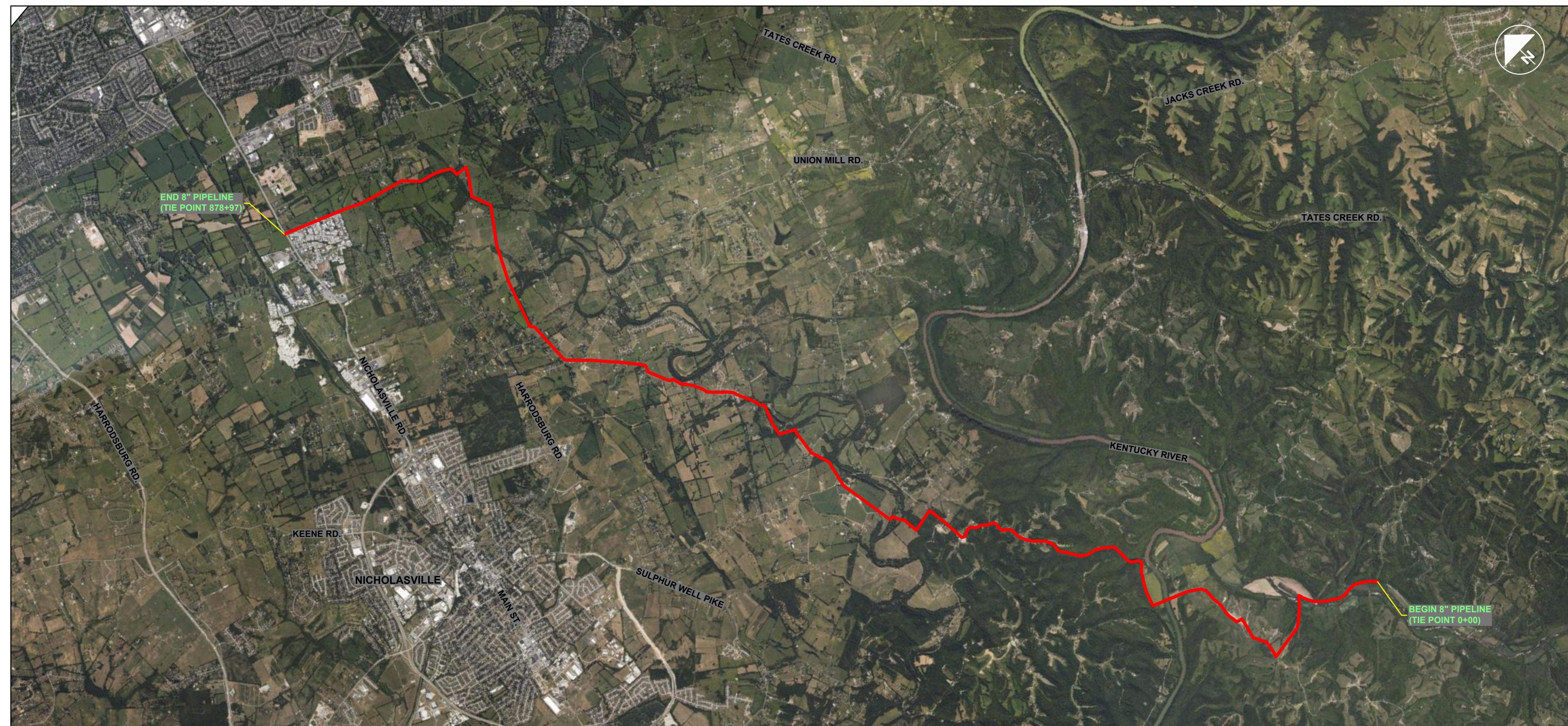
Kathle Sosby
Notary Public, ID KYNP41842
State at Large, Kentucky
My Commission Expires on Dec. 15, 2025

8" NICHOLASVILLE 2ND FEED DELTA NATURAL GAS COMPANY INC



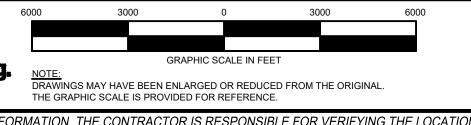
FOR REVIEW

03/21/2022









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Α	11/22/2021	JCS	ISSUED FOR REVIEW		
В	12/8/2021	JCS	ISSUED FOR PSC FILING		
С	03/18/2022	JCS	RE-ISSUED FOR PSC FILING		

OPERATING CENTER:

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B" NICHOLASVILLE 2ND FEED

DELTA NATURAL GAS COMPANY INC

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B" NICHOLASVILLE 2ND FEED

DELTA NATURAL GAS COMPANY INC

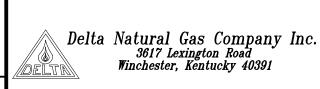
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3	0002	DETAIL	С	03/18/202
		PIPELINE		
4	1014	ALIGNMENT	С	03/18/202
5	1013	ALIGNMENT	С	03/18/202
6	1012A	ALIGNMENT	С	03/18/202
7	1012	ALIGNMENT	С	03/18/202
8	1011	ALIGNMENT	С	03/18/202
9	1010	ALIGNMENT	С	03/18/202
10	1009	ALIGNMENT	С	03/18/202
11	1008	ALIGNMENT	С	03/18/202
12 1007		ALIGNMENT		03/18/202
13 1006		ALIGNMENT		03/18/202
14	1005	ALIGNMENT	С	03/18/202
15	1004	ALIGNMENT	С	03/18/202
16	1003	ALIGNMENT	С	03/18/202
17	1002	ALIGNMENT	С	03/18/202
18	1001	ALIGNMENT	С	03/18/202
19	1000A	ALIGNMENT	С	03/18/202
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21	9001	TOWN BORDER STATION SCHEMATIC	С	03/18/202

LEGEND:

PROPOSED 8" PIPELINE

RAVINE/CREEK **WETLAND PARCELS RIVER**

RE-ISSUED FOR PSC FILING NOT FOR CONSTRUCTION 03/18/2022

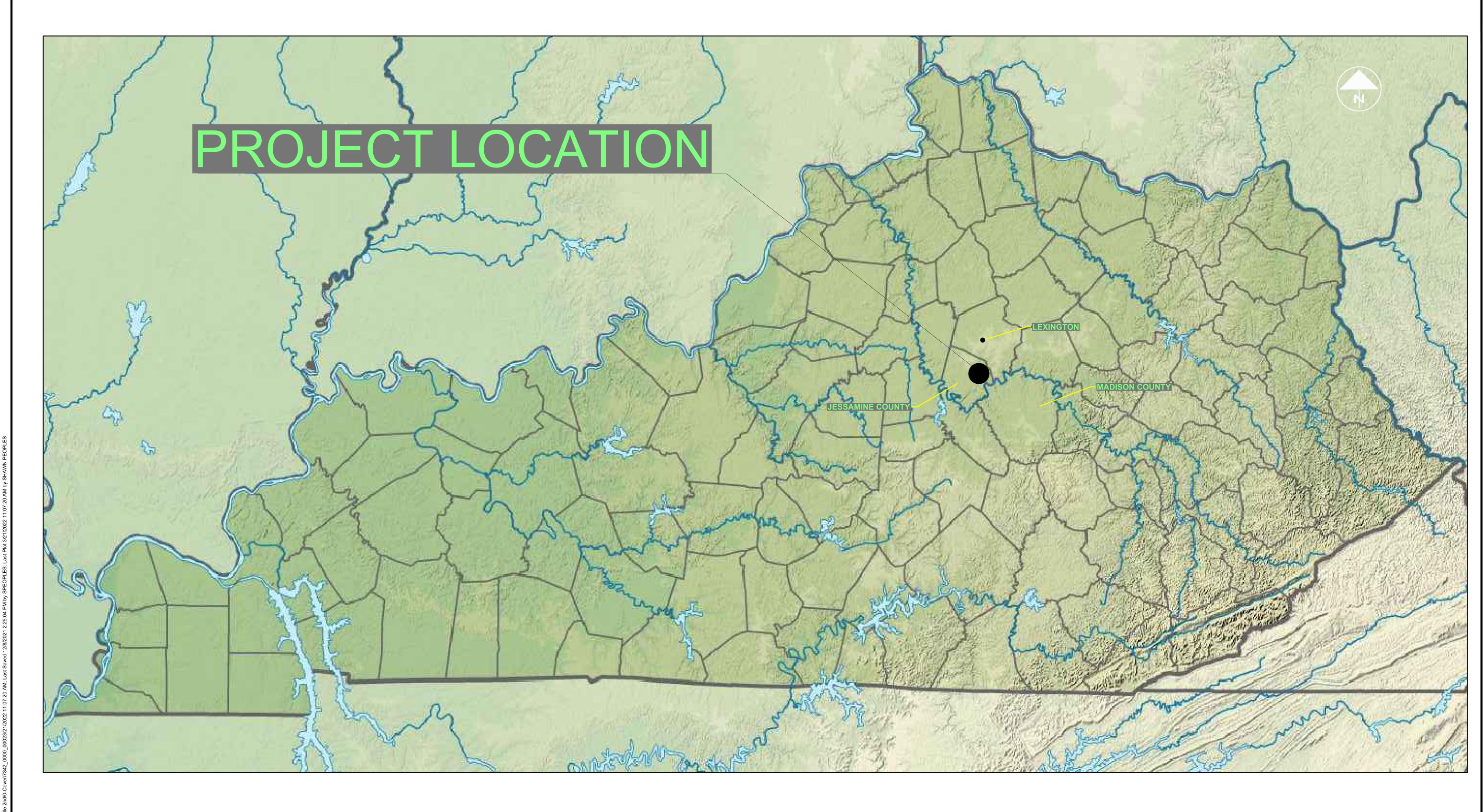


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8" NICHOLASVILLE 2ND FEED DELTA NATURAL GAS COMPANY INC GENERAL INDEX EnSiteUSA DWG NO. 0001 SHEET NO.
SHEET 2

Delta Natural Gas Company Inc. 3617 Lexington Road Winchester, Kentucky 40391



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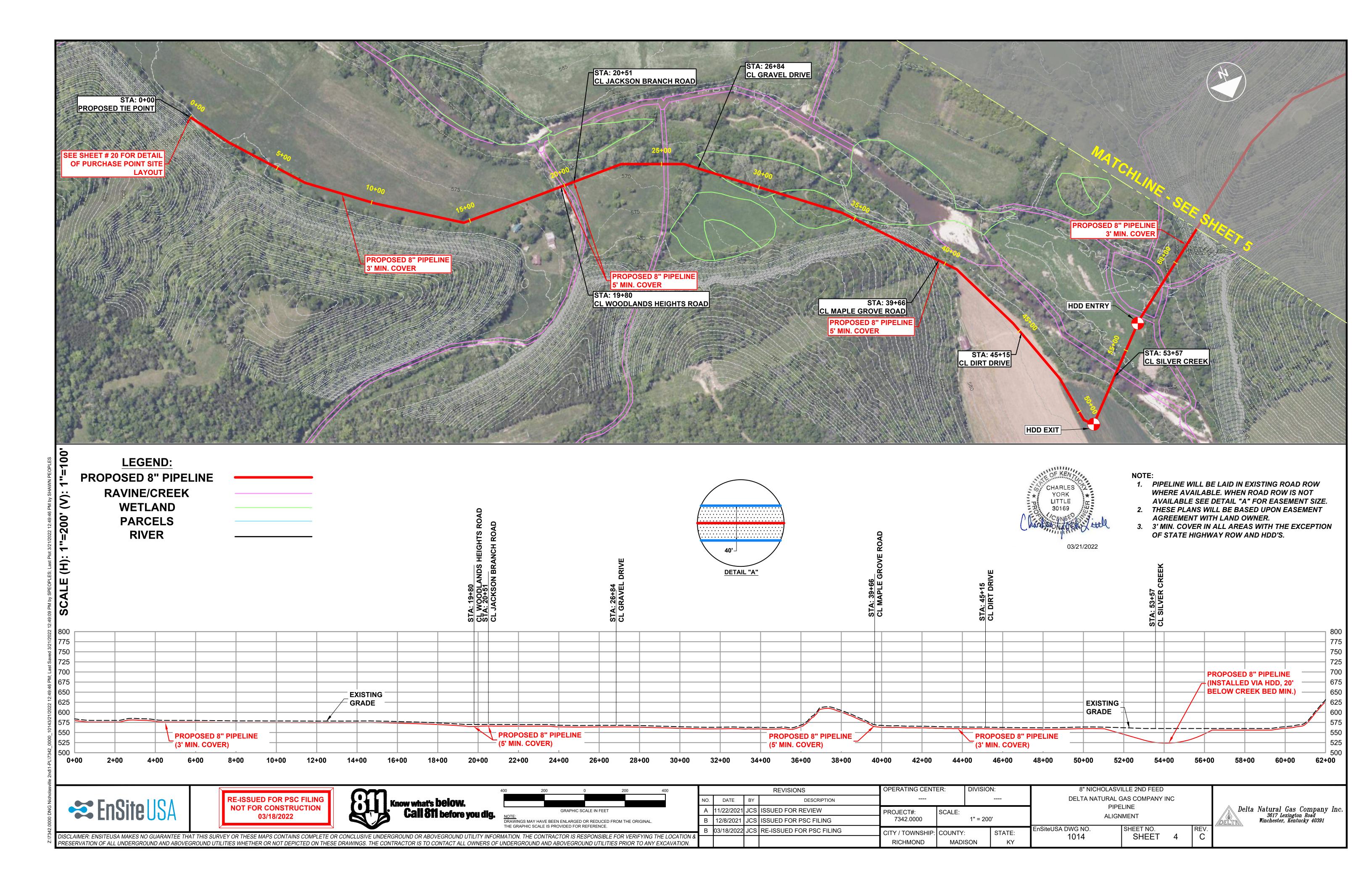
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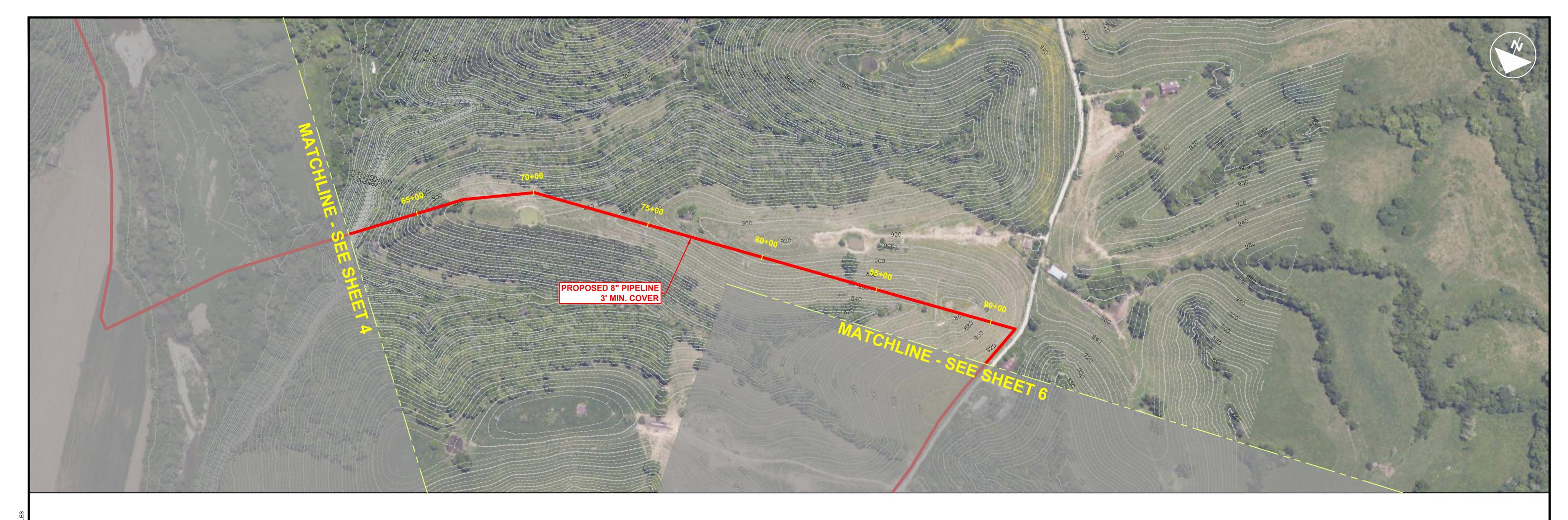
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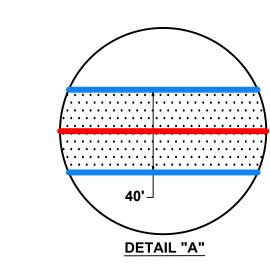
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Delta Natural Gas Company Inc. 3617 Lexington Road Winchester, Kentucky 40391

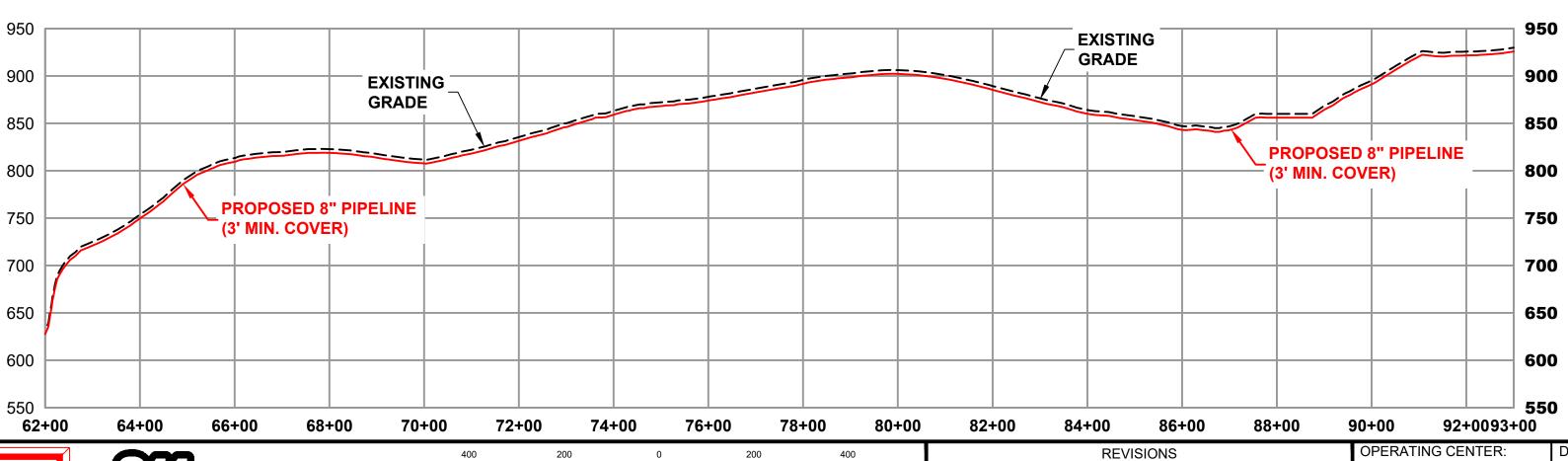
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- 1. PIPELINE WILL BE LAID IN EXISTING ROAD ROW WHERE AVAILABLE. WHEN ROAD ROW IS NOT AVAILABLE SEE DETAIL "A" FOR EASEMENT SIZE.
- 2. THESE PLANS WILL BE BASED UPON EASEMENT AGREEMENT WITH LAND OWNER.
- 3. 3' MIN. COVER IN ALL AREAS WITH THE EXCEPTION OF STATE HIGHWAY ROW AND HDD'S.



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THE GRAPHIC SCALE IS PROVIDED FOR REFERENCE.

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DESCRIPTION A 11/22/2021 JCS ISSUED FOR REVIEW B 12/8/2021 JCS ISSUED FOR PSC FILING B 03/18/2022 JCS RE-ISSUED FOR PSC FILING

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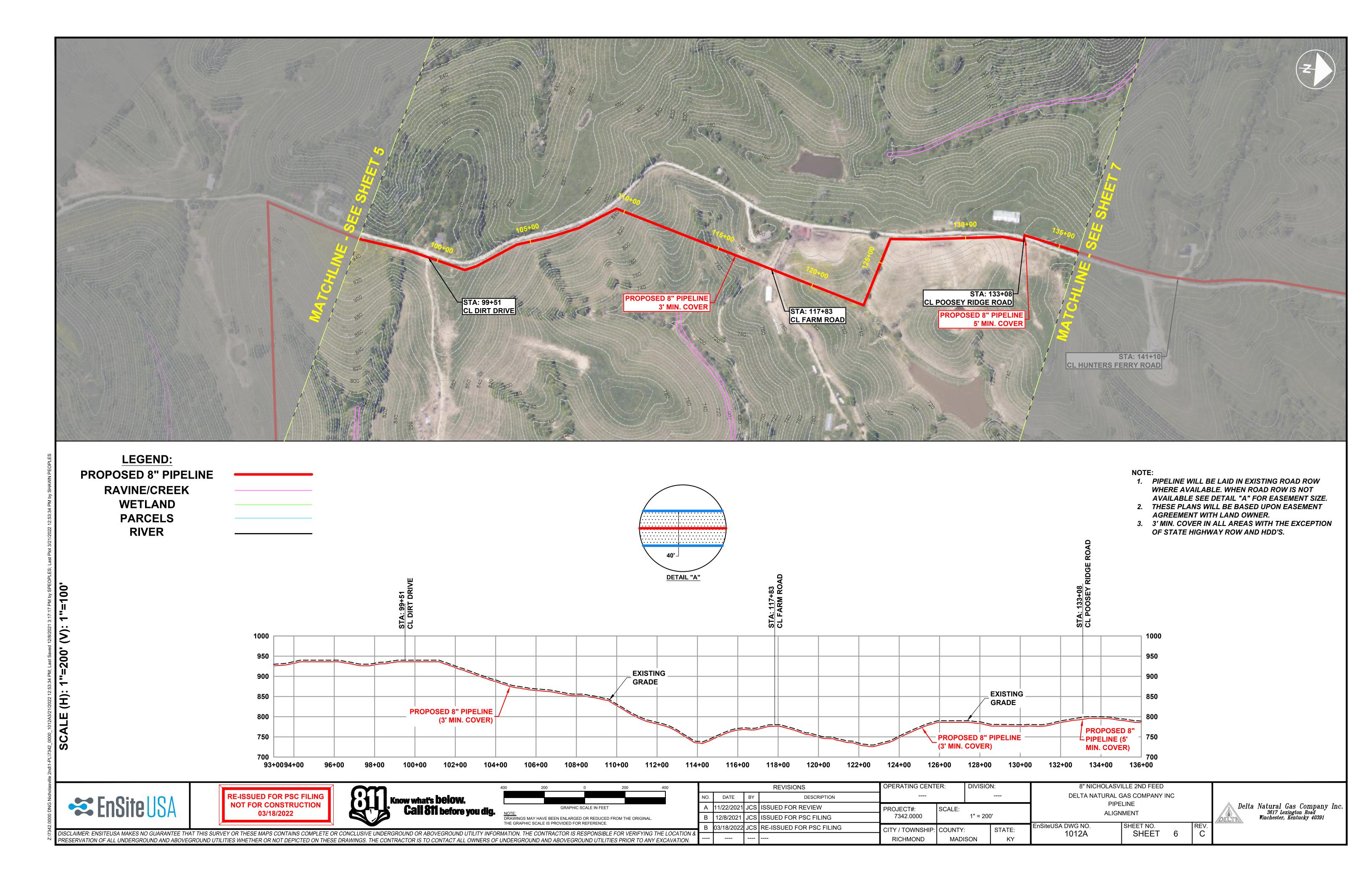
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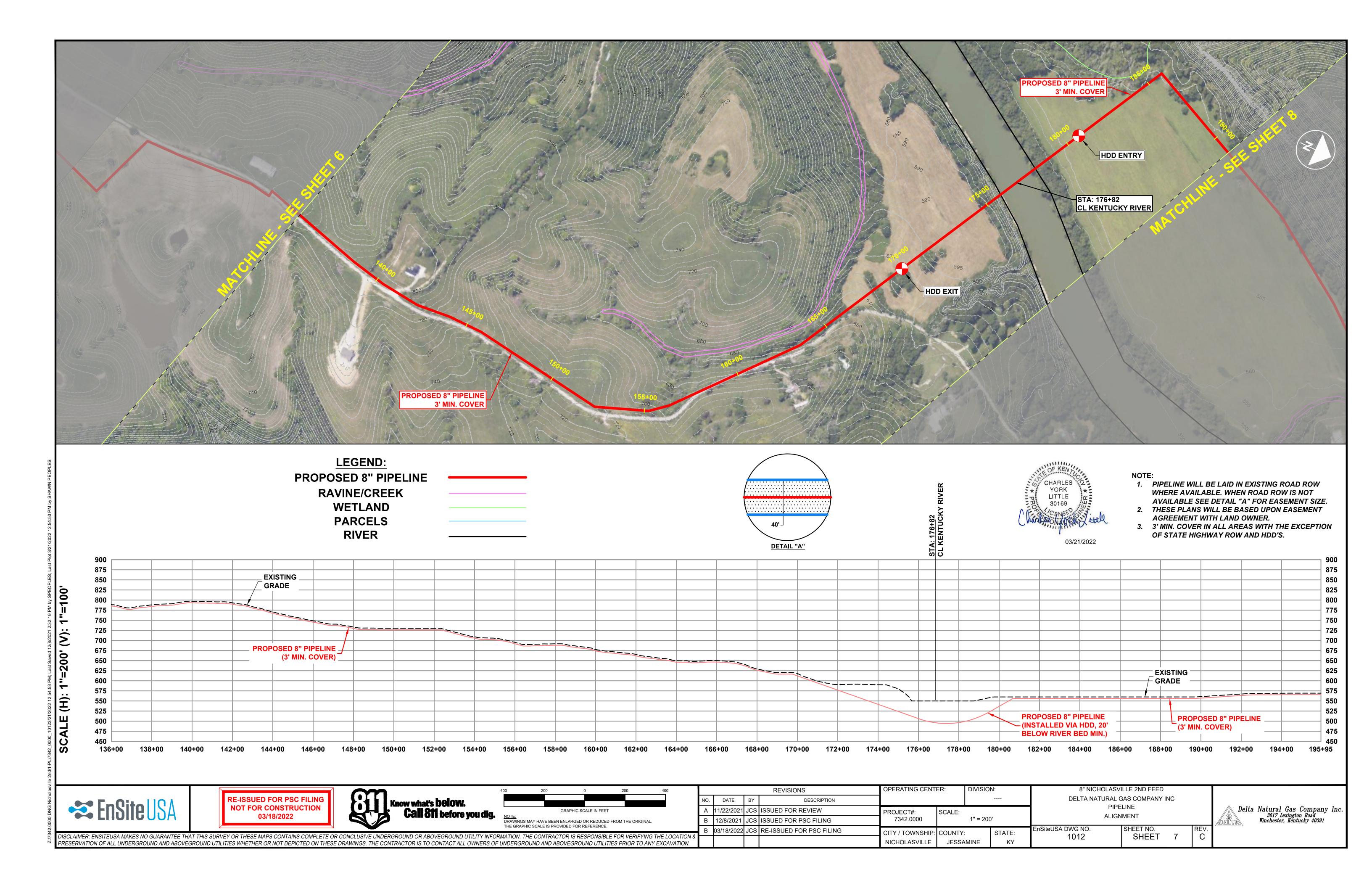
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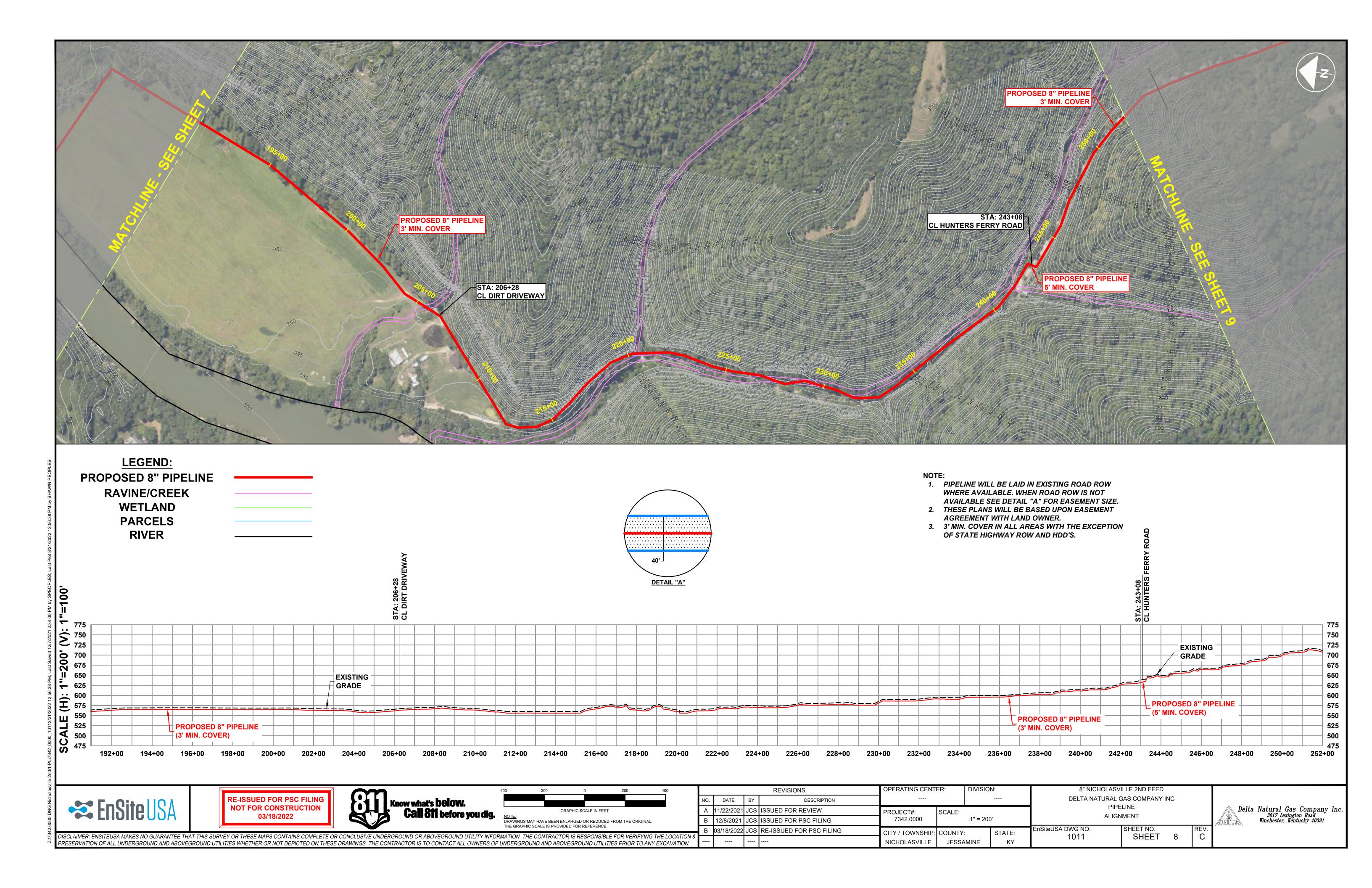
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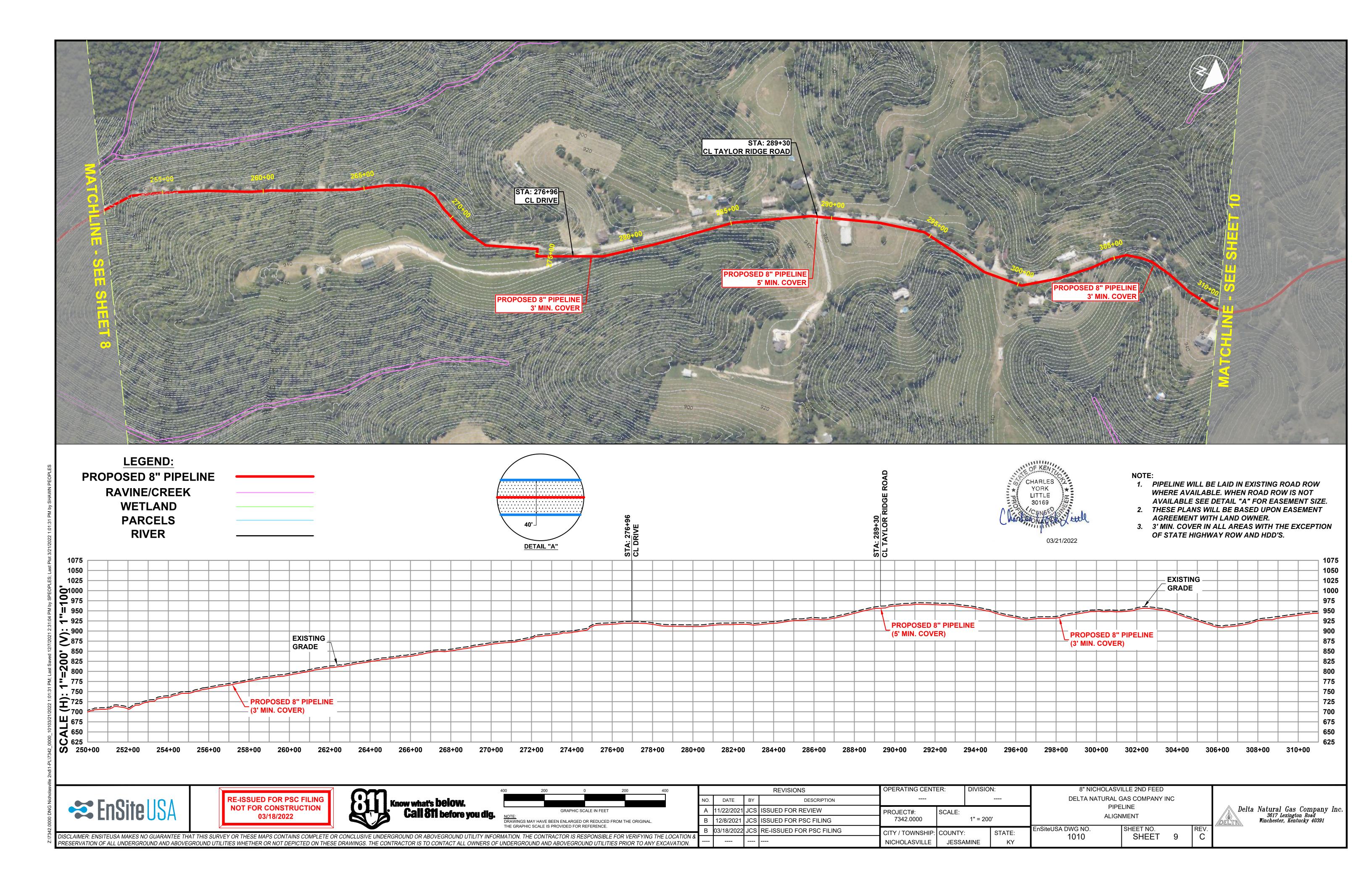
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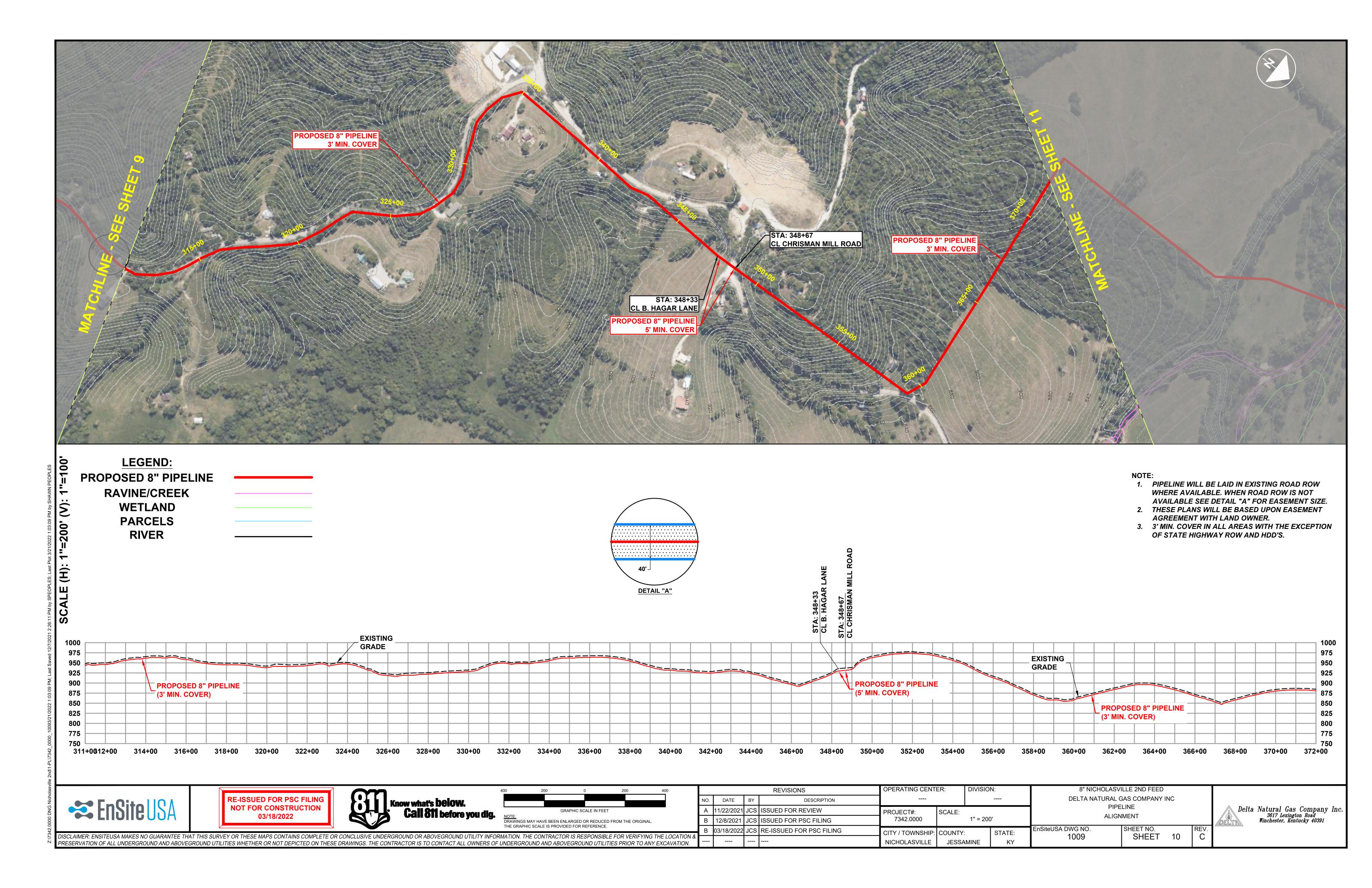
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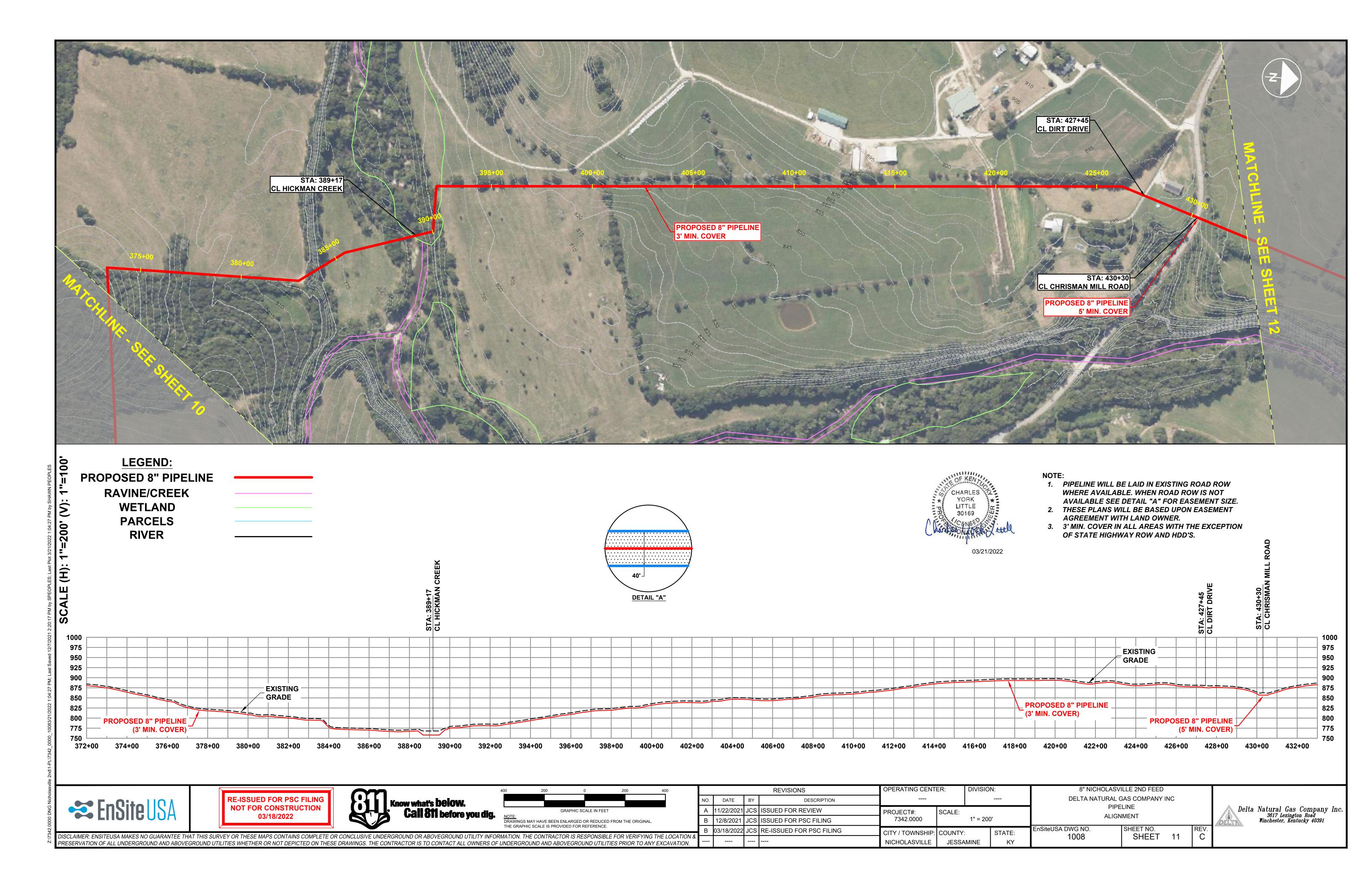


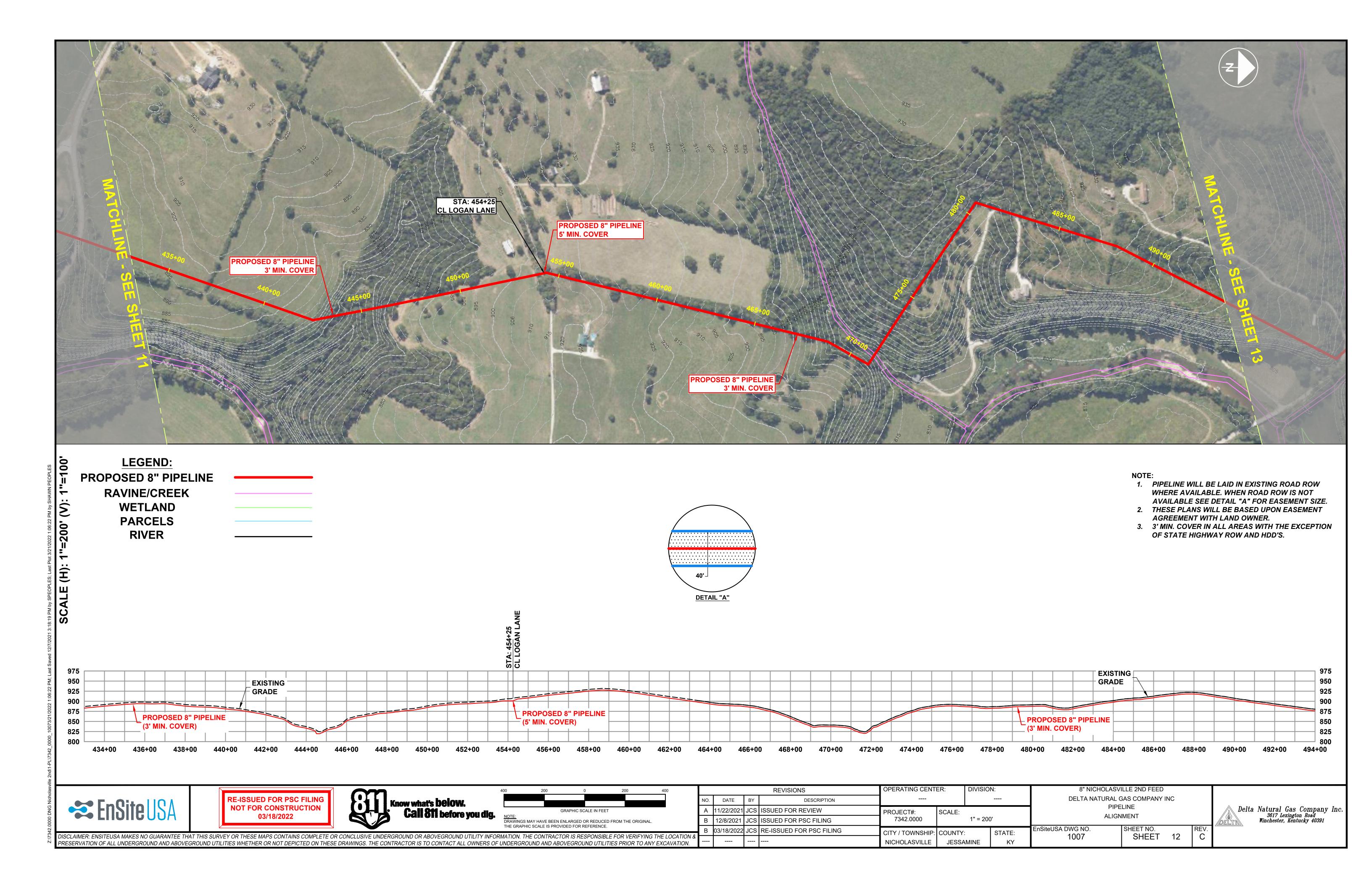


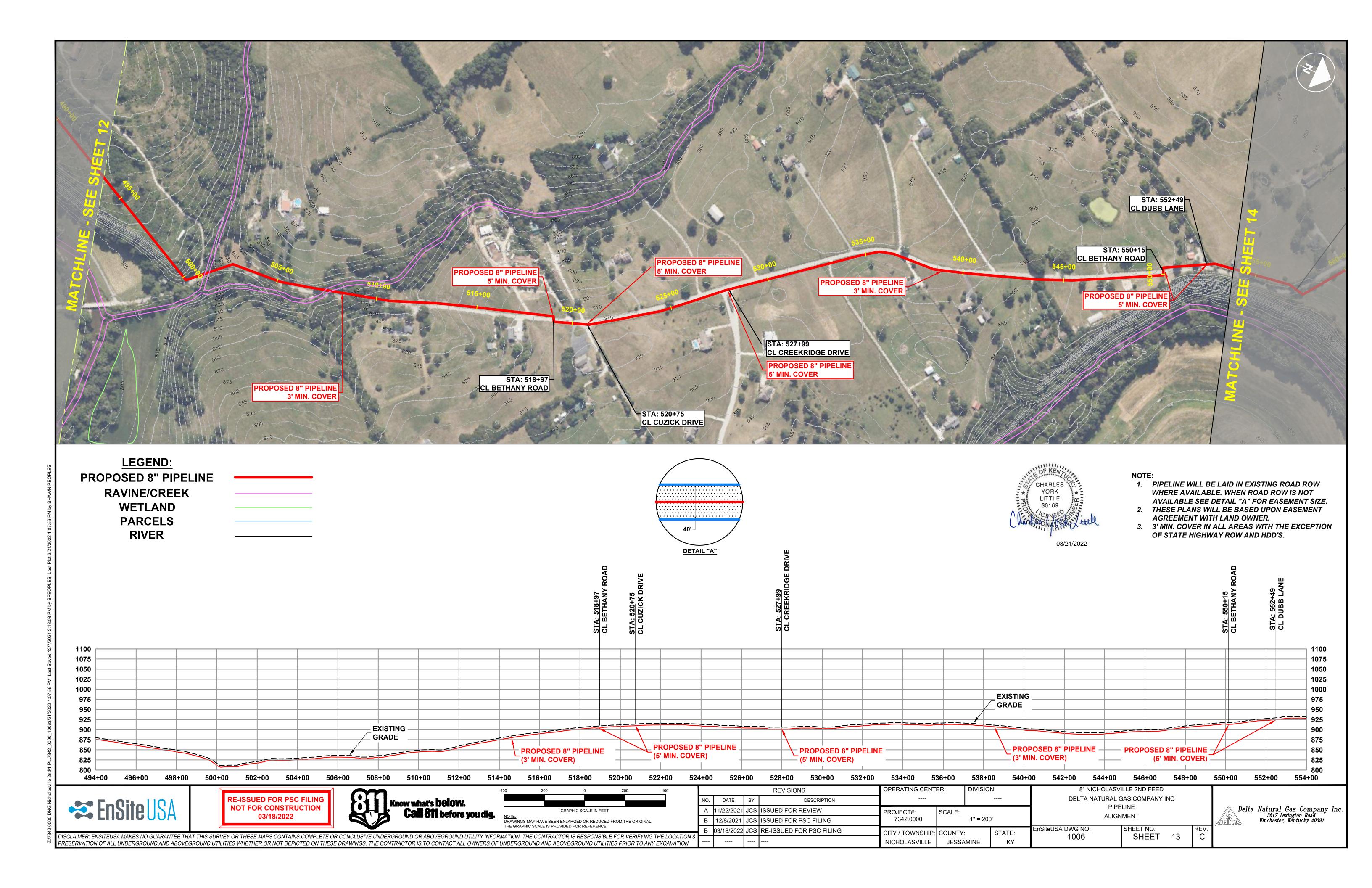


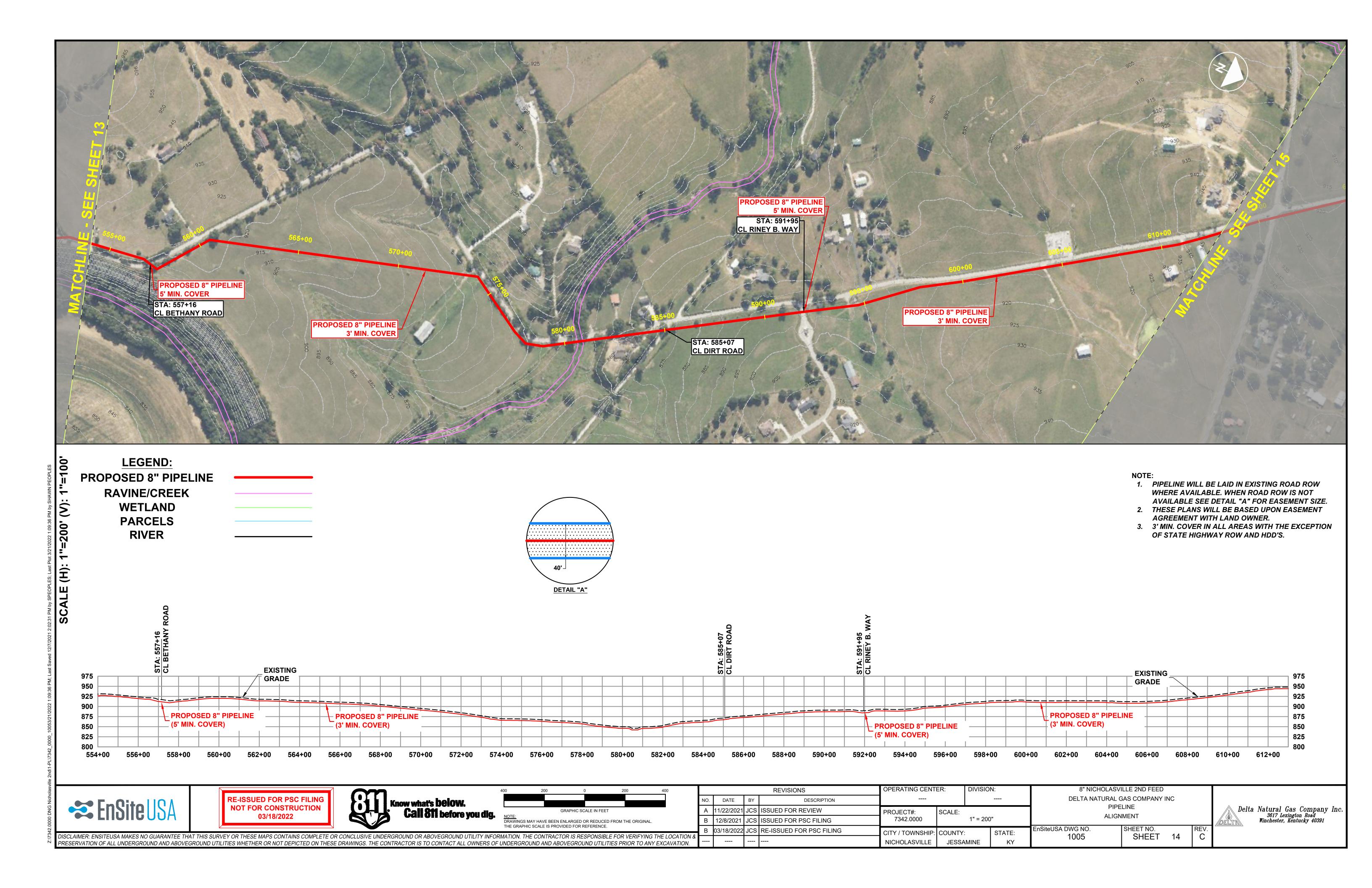


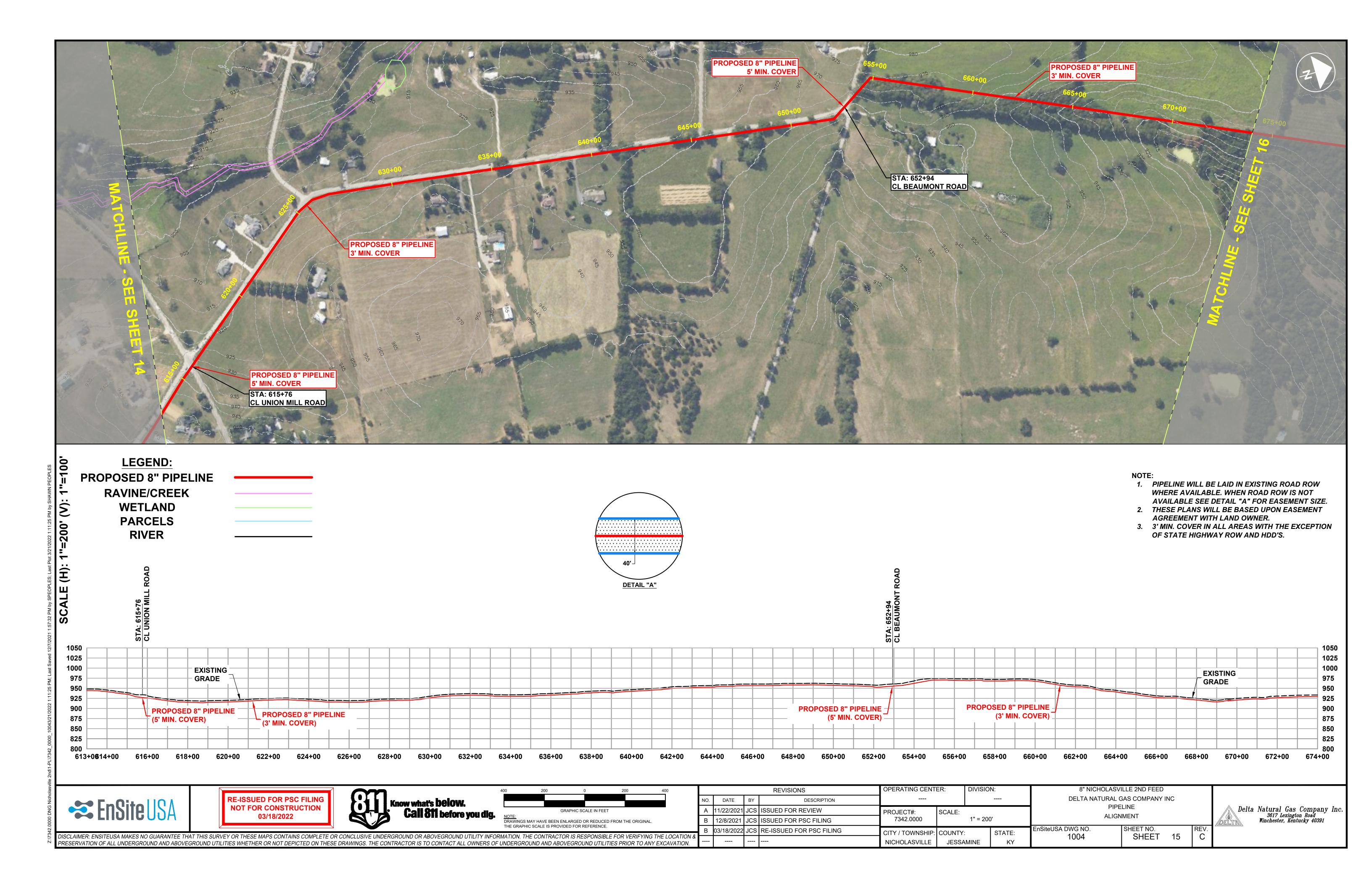


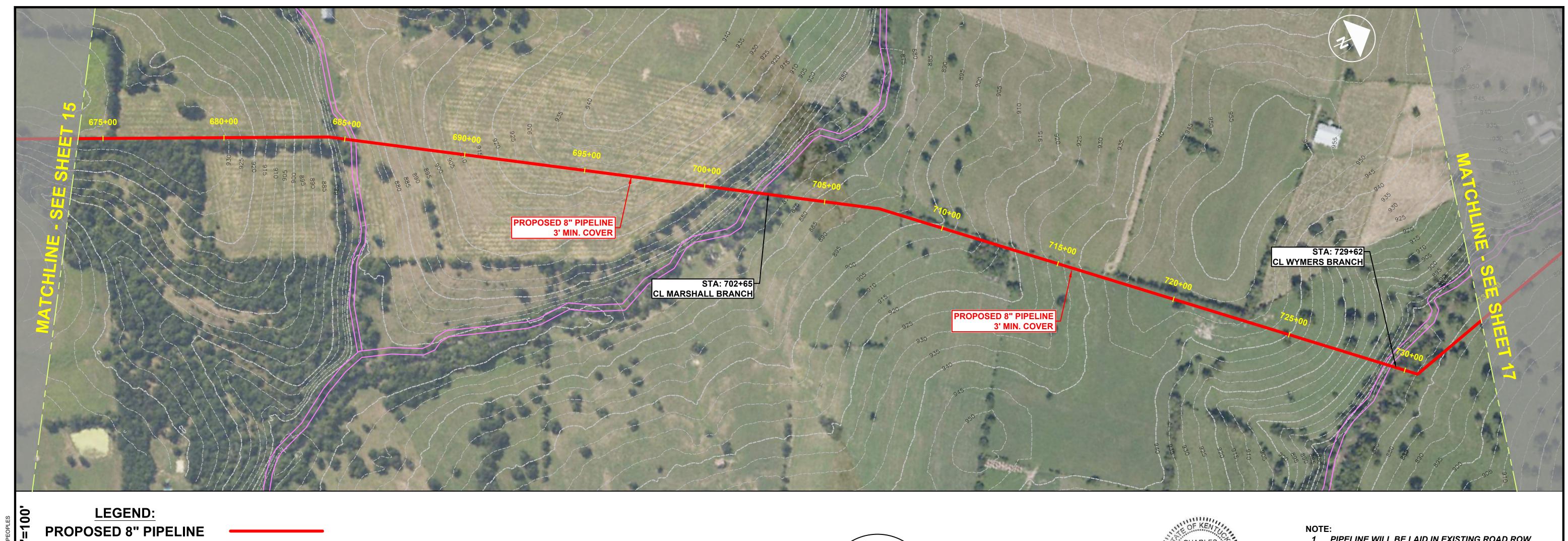


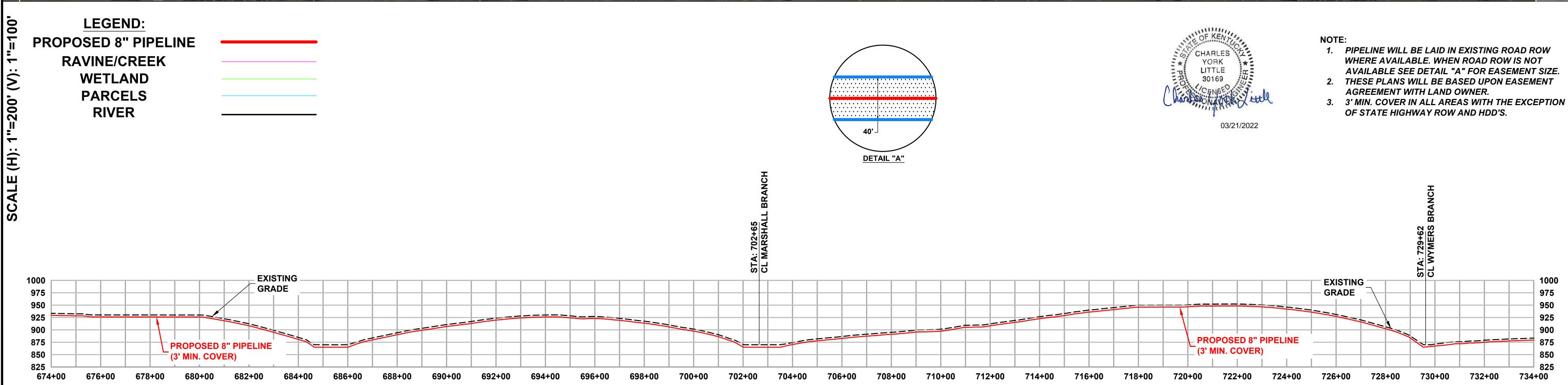








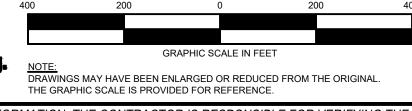






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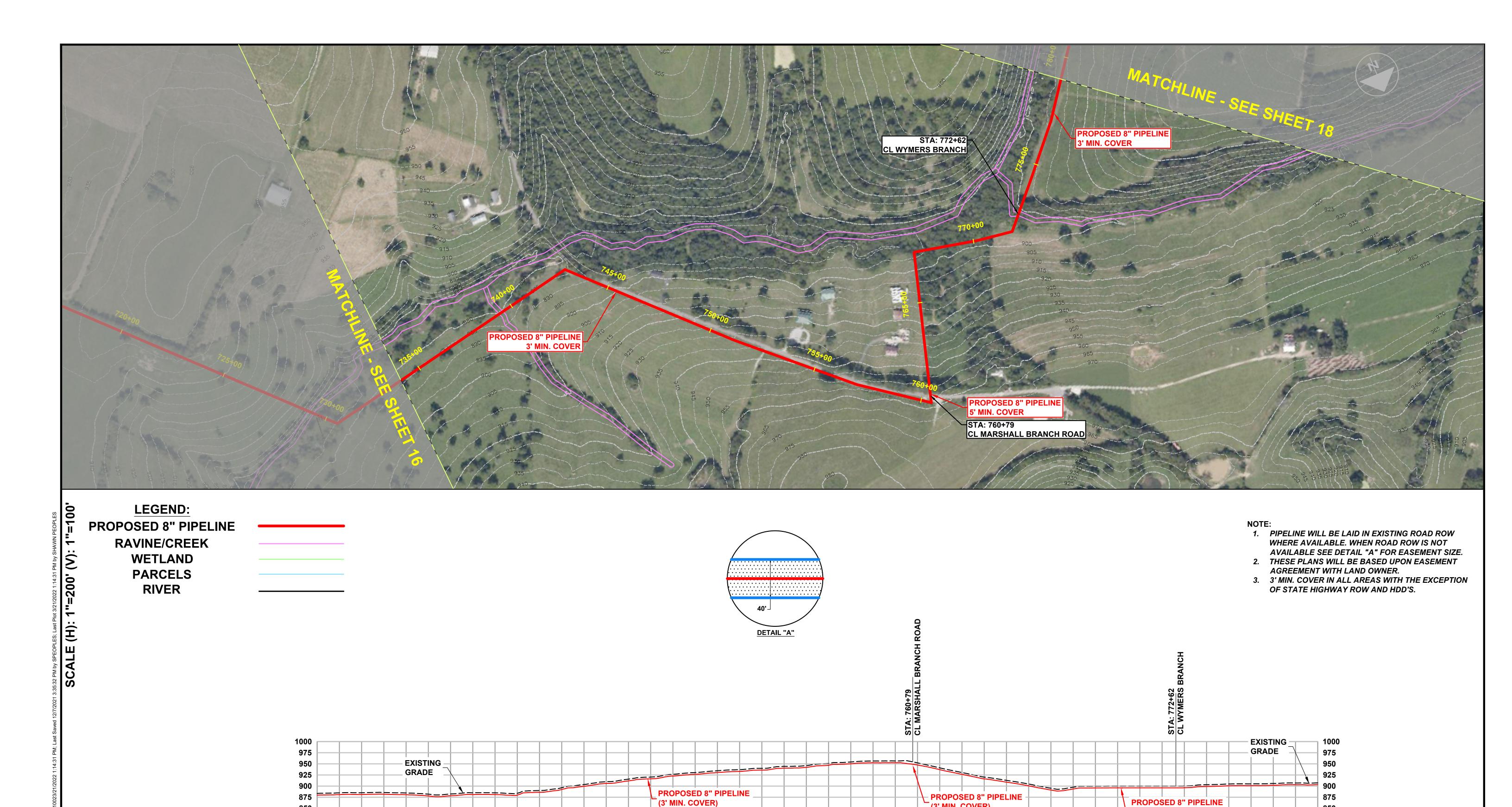
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Delta Natural Gas Company Inc. 3617 Lexington Road Winchester, Kentucky 40391

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8" NICHOLASVILLE 2ND FEED DELTA NATURAL GAS COMPANY INC **PIPELINE** ALIGNMENT

Delta Natural Gas Company Inc. 3617 Lexington Road Winchester, Kentucky 40391

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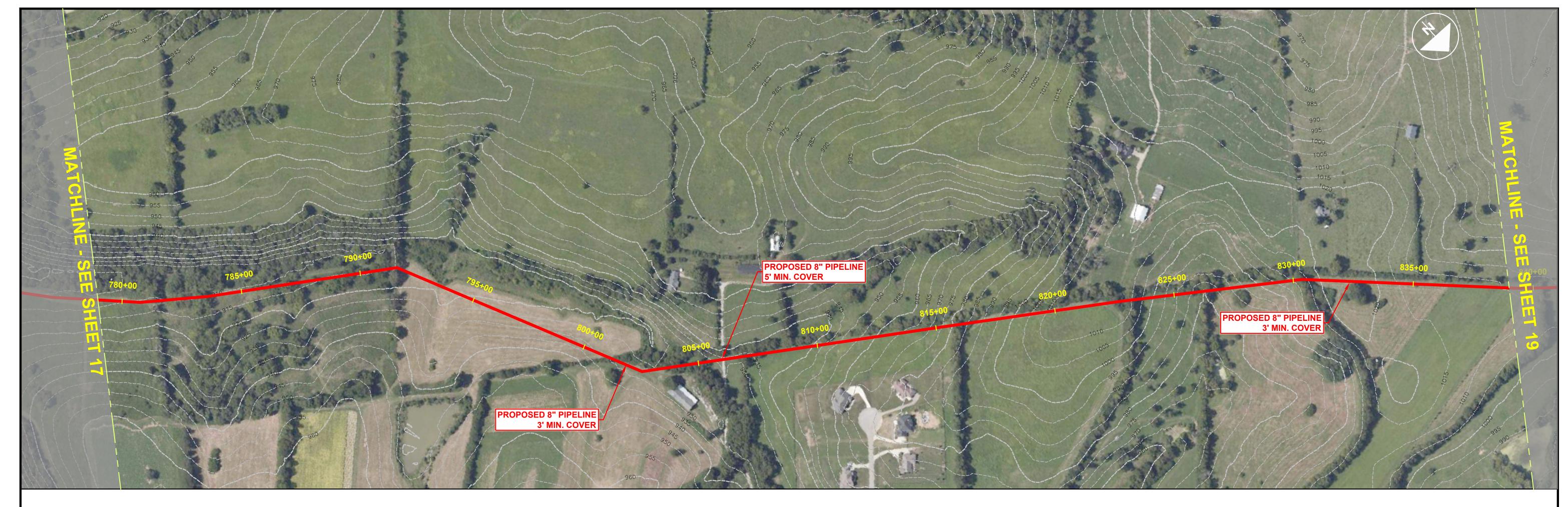
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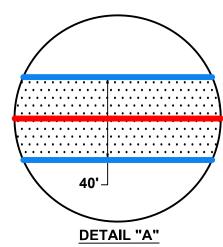
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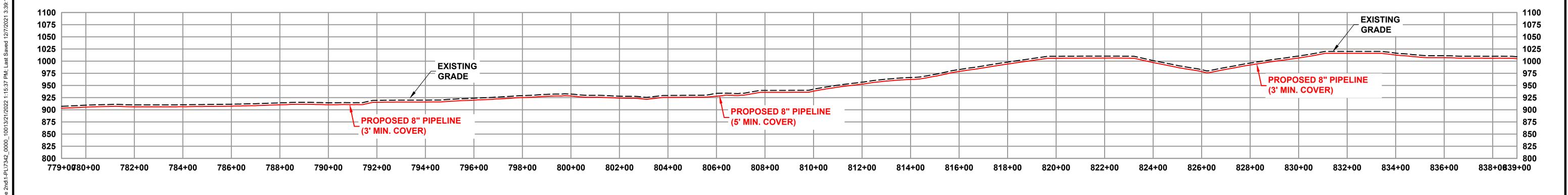


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1" = 200'

STATE:

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В	03/18/2022	JCS	RE-ISSUED FOR PSC FILING	CITY / TOWNSHIP:	COUNTY:	
				NICHOLASVILLE	JESSA	MINE

8" NICHOLASVILLE 2ND FEED DELTA NATURAL GAS COMPANY INC PIPELINE ALIGNMENT REV.

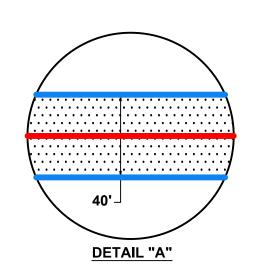
Delta Natural Gas Company Inc. 3617 Lexington Road Winchester, Kentucky 40391

DISCLAIMER: ENSITEUSA MAKES NO GUARANTEE THAT THIS SURVEY OR THESE MAPS CONTAINS COMPLETE OR CONCLUSIVE UNDERGROUND OR ABOVEGROUND UTILITY INFORMATION. THE CONTRACTOR IS RESPONSIBLE FOR VERIFYING THE LOCATION & PRESERVATION OF ALL UNDERGROUND AND ABOVEGROUND UTILITIES WHETHER OR NOT DEPICTED ON THESE DRAWINGS. THE CONTRACTOR IS TO CONTACT ALL OWNERS OF UNDERGROUND AND ABOVEGROUND UTILITIES PRIOR TO ANY EXCAVATION.

EnSiteUSA DWG NO. 1001 SHEET 18

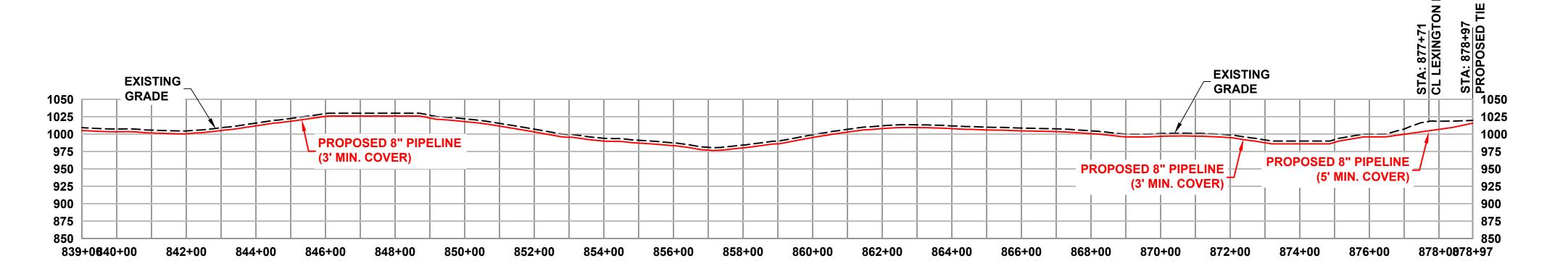


LEGEND: PROPOSED 8" PIPELINE RAVINE/CREEK WETLAND **PARCELS RIVER**



NOTE:

- 1. PIPELINE WILL BE LAID IN EXISTING ROAD ROW WHERE AVAILABLE. WHEN ROAD ROW IS NOT AVAILABLE SEE DETAIL "A" FOR EASEMENT SIZE.
- 2. THESE PLANS WILL BE BASED UPON EASEMENT AGREEMENT WITH LAND OWNER.
- 3. 3' MIN. COVER IN ALL AREAS WITH THE EXCEPTION OF STATE HIGHWAY ROW AND HDD'S.



RE-ISSUED FOR PSC FILING NOT FOR CONSTRUCTION 03/18/2022

Know what's below.

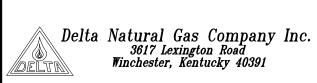
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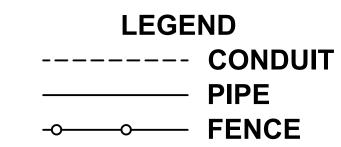
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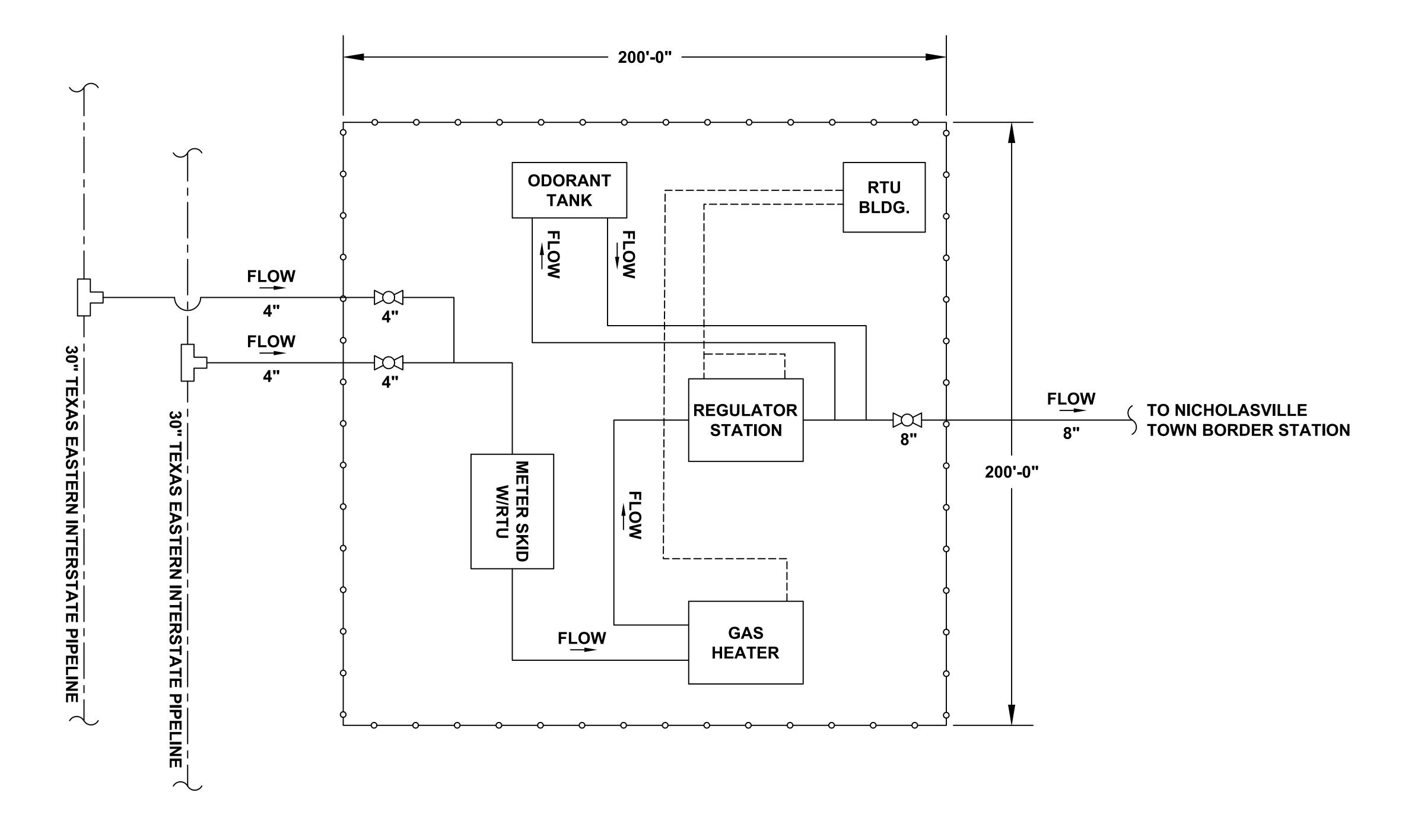
OPERATING CENTER: DIVISION: SCALE: PROJECT#: 7342.0000 1" = 200' STATE: CITY / TOWNSHIP: COUNTY: NICHOLASVILLE **JESSAMINE**

8" NICHOLASVILLE 2ND FEED DELTA NATURAL GAS COMPANY INC **PIPELINE** ALIGNMENT EnSiteUSA DWG NO. 1000A REV.



SHEET NO.
SHEET 19





EnSite USA

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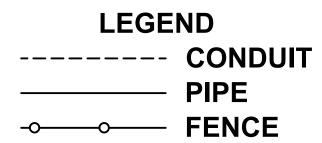
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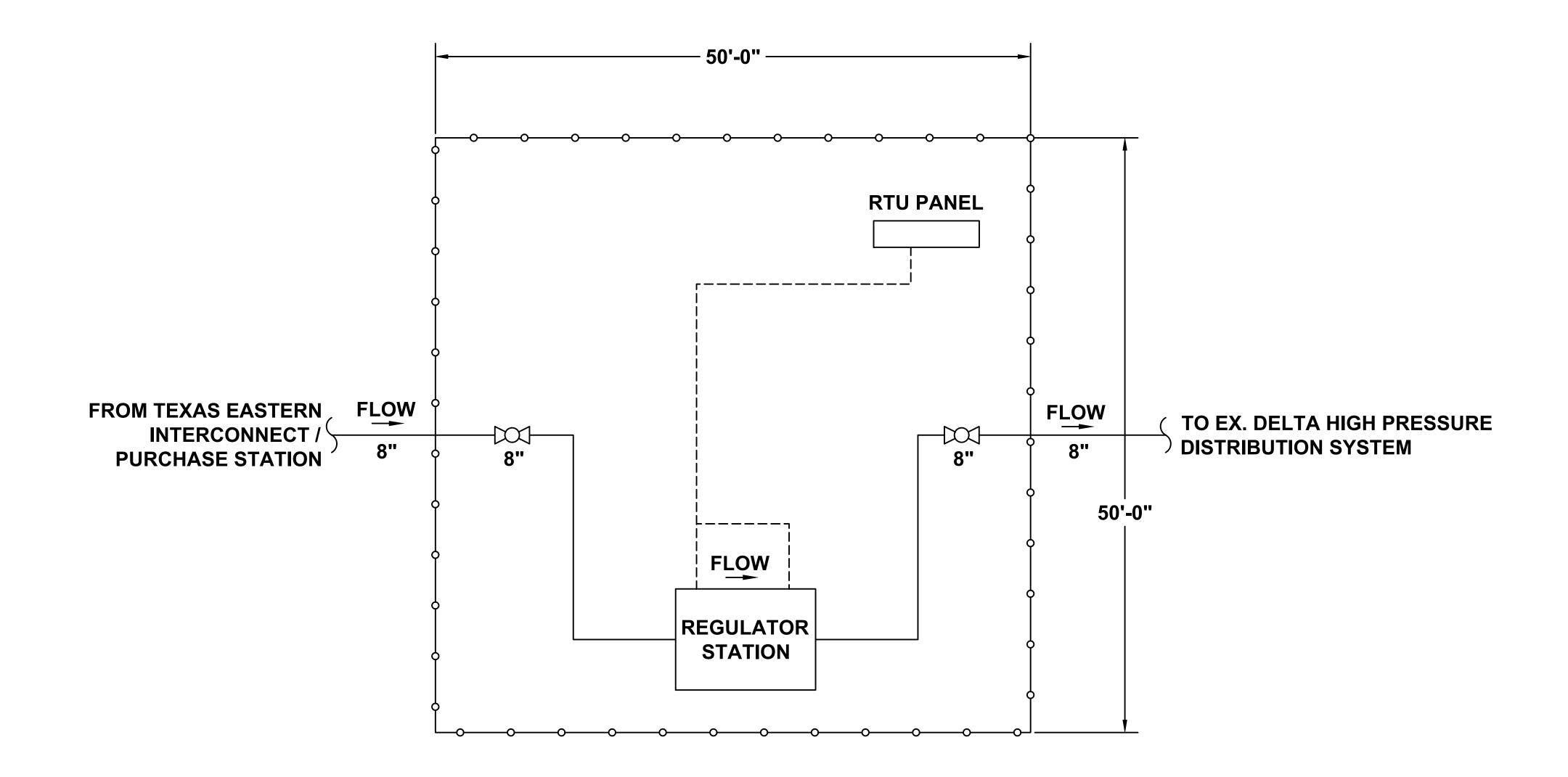
NICHOLASVILLE

JESSAMINE

8" NICHOLASVILLE 2ND FEED DELTA NATURAL GAS COMPANY INC **DETAILS & BOM** MADISON CO. PURCHASE POINT SCHEMATIC SHEET NO.
SHEET 20

Delta Natural Gas Company Inc. 3617 Lexington Road Winchester, Kentucky 40391







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NICHOLASVILLE	JESSA	MINE	KY	

8" NICHOLASVILLE 2ND FEED DELTA NATURAL GAS COMPANY INC **DETAILS & BOM** TOWN BORDER STATION SCHEMATIC nSiteUSA DWG NO. 9001 SHEET NO.
SHEET 21

PRESERVATION OF ALL UNDERGROUND AND ABOVEGROUND UTILITIES WHETHER OR NOT DEPICTED ON THESE DRAWINGS. THE CONTRACTOR IS TO CONTACT ALL OWNERS OF UNDERGROUND AND ABOVEGROUND UTILITIES PRIOR TO ANY EXCAVATION.

DELTA NATURAL GAS CO. INC. ESTIMATED COST SUMMARY NICHOLASVILLE TRANSMISSION 2ND FEED - 8" STEEL NICHOLASVILLE, KY

<u>ITEM</u>	E	STIMATED COST
CONTRACTOR COST	\$	6,715,880.00
LABOR COST	\$	324,000.00
MATERIAL COST	\$	3,548,658.00
ACCOUNTS PAYABLE (MISC.)	\$	3,809,508.60
SUB-TOTAL	\$	14,398,046.60
OVERHEAD COST 32.85%	\$	4,729,758.31
TOTAL	\$	19,127,804.91