

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

THE ELECTRONIC APPLICATION OF)	
COLUMBIA GAS OF KENTUCKY, INC.)	CASE NO.
FOR AN ADJUSTMENT OF RATES;)	2024-00092
APPROVAL OF DEPRECIATION STUDY;)	
APPROVAL OF TARIFF REVISIONS; AND)	
OTHER RELIEF)	

**COLUMBIA GAS OF KENTUCKY, INC.'S
MOTION FOR AN INFORMAL CONFERENCE**

Comes now Columbia Gas of Kentucky, Inc., (“Columbia”), by and through counsel, pursuant to 807 KAR 5:001, Section 9(4), requests that the Kentucky Public Service Commission (“Commission”) schedule an informal conference to discuss and clarify the Commission’s concerns with Columbia’s DIMP Plan as outlined in the December 30, 2024 Order in this docket (the “Order”).¹ Columbia respectfully requests this conference be scheduled on January 15, 2025. The issue for discussion is not addressed in the Joint Stipulation approved by the Commission, nor has any impact on the rates established by the Commission’s approval.

¹ *In the Matter of the Electronic Application of Columbia Gas of Kentucky, Inc. for an Adjustment of Rates; Approval of Depreciation Study; Approval of Tariff Revisions; and Other Relief*, Case No. 2024-00092, Order (Ky. PSC Dec. 30, 2024) at 65-66.

As further background for its request herein, Columbia respectfully states as follows:

1. Page 65 of the Order states that:

On more than one occasion, Columbia Kentucky was asked to provide its DIMP.³⁰⁷ Instead, Don Ayers, on behalf of Columbia Kentucky, stated NiSource, Inc., its parent company that actually has no employees, had a plan.³⁰⁸

2. Order Footnote 308 references one of three confidential attachments provided by Columbia that, when combined, contain Columbia's DIMP Plan. Attachment A contains the common framework applicable to Columbia and certain affiliates. Attachments B and C contain the Kentucky-specific DIMP information required by 49 CFR 192, Subpart P. In response to the referenced data request, Columbia stated, in its entirety: "Please refer to CONFIDENTIAL KY PSC Case No. 2024-00092 Staff 3-1 Attachments A, B, and C." Columbia has been unable to locate any reference to Witness Ayers stating that "NiSource, Inc., its parent company that actually has no employees, had a plan."

3. The Frequently Asked Questions² that accompany PHMSA's Gas Distribution Integrity Management Program rules state that "Multi-state operators may have one or more plans but must be able to filter by state their risk ranking, measures to

² Please refer to *Distribution Integrity Management Frequently Asked Questions*, Eff. October 26, 2015, available here: <https://www.phmsa.dot.gov/pipeline/gas-distribution-integrity-management/gas-distribution-integrity-management-faqs>

reduce risk, performance measures and baselines, and other related data and information.”³ Columbia’s DIMP Plan, provided in response to Commission Staff’s Third Request for Information, No. 1, contains each of the filters required. Kentucky-specific risk ranking can be found in Appendix C;⁴ measures to reduce risk can be found in Appendix D;⁵ performance measures and baselines can be found in Appendix E;⁶ other related data can be found throughout the appendices and addendum.⁷ Kentucky does not have any specific requirements for additions to DIMP Plans. If these existed, they would be included in the DIMP Plan’s addendum.⁸

4. Further, Commission Staff reviews Columbia’s DIMP plan annually. The most recent review of Columbia’s DIMP plan resulted in a letter dated December 12, 2024, furnished to Columbia by Commission Staff stating that “[b]ased on the inspector’s observations, no violations were identified.”⁹

WHEREFORE, on the basis of the foregoing, Columbia respectfully requests the Commission to schedule an informal conference to review and clarify the Commission’s concerns with Columbia’s DIMP Plan.

³ *Id.* at 7 of 29.

⁴ See CONFIDENTIAL KY PSC Case No. 2024-00092 Staff 3-1 Attachment C at 52.

⁵ *Id.* at 102.

⁶ *Id.* at 132.

⁷ See CONFIDENTIAL KY PSC Case No. 2024-00092 Staff 3-1 Attachment B and C

⁸ See CONFIDENTIAL KY PSC Case No. 2024-00092 Staff 3-1 Attachment B.

⁹ See *Transmission & Distribution Integrity Management Program Annual Review Columbia Gas of Kentucky, Inc.*, Kentucky Public Service Commission (December 12, 2024 Letter) – Attached for reference.

This the 7th day of January, 2025.

Respectfully submitted,

/s/ John R. Ryan _____

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COLUMBIA GAS OF KENTUCKY, INC.

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission for filing on January 7, 2025; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; by virtue of the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made.

/s/ John R. Ryan

Counsel for Columbia Gas of Kentucky, Inc.



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Angie Hatton
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John Will Stacy
Commissioner

December 12, 2024

Kimra Cole, President & COO
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
PO Box 14241
Lexington, KY

Re: Transmission & Distribution Integrity Management Program Annual Review
Columbia Gas of Kentucky, Inc.

Dear Ms. Cole:

Public Service Commission staff performed a Transmission & Distribution Integrity Management Program Annual Review inspection of Columbia Gas of Kentucky, Inc., on December 12, 2024, reviewing utility operations and management practices pursuant to Commission regulations. The report of this inspection is enclosed with this letter.

Based on the inspector's observations, no violations were identified. This closes the 2023 inspection and no further action is required.

Please review the enclosed inspection report in its entirety as you will find further information noted in regard to the inspection. If you have any questions regarding this inspection, feel free to contact David Nash at 502-791-0503 or via email at David.Nash@ky.gov.

Sincerely,

A handwritten signature in blue ink that reads "Melissa Hallmark".

Assistant Director DOI /
Gas Pipeline Safety Program Manager
Public Service Commission

Enclosure(s): Inspection Report

