COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:		
ELECTRONIC ANNUAL PIPELINE REPLACEMENT PROGRAM FILING OF APACHE GAS TRANSMISSION COMPANY, INC.))	CASE NO. 2024-00167

RESPONSES TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO APACHE GAS TRANSMISSION COMPANY, INC. DATED JANUARY 28, 2025

Filed: February 17, 2025

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC ANNUAL PIPELINE F PROGRAM FILING OF APACHE GA COMPANY, INC.)	CASE NO. 2024-00167	
VERIFICATION OF DAVI	D THOMAS SHIR	RΕΥ, .	JR.
COMMONWEALTH OF KENTUCKY)		

David Thomas Shirey, Jr., President of Apache Gas Transmission Company, Inc., being duly sworn, states that he has prepared certain of the following responses of Apache Gas Transmission Company, Inc. to the data requests issued by Commission Staff in Case No. 2024-00167 and that the matters and things set forth in his responses are true and accurate to the best of his knowledge, information and belief, formed after reasonable <u>inquiry</u>.

David Thomas Shrey, Jr.

Subscribed, acknowledged and sworn to before me by David Thomas Shirey, Jr., President of Apache Gas Transmission Company Inc., on this Manager 2025.

NOTARY PUBLIC, Notary #124NP7672"

Commission expiration: 3) 2127

PSC'S REQUEST FOR INFORMATION DATED 01/28/25

REQUEST 1

RESPONSIBLE PARTY: David Thomas Shirey, Jr.

Refer to the Annual Pipeline Replacement Plan (PRP) Report document titled "Annual_PRP_filing_-_240531_-_Final.pdf:, page 1. State whether Apache or Burkesville holds title, i.e., is the account owner, of the PRP escrow account.

Apache is the owner of the PRP escrow account. Originally the PRP escrow account was established in the name of Burkesville Gas. However, as Apache provided in its Annual PRP Status Report in Case No. 2023-00124, filed on April 21, 2023, the escrow account was changed into Apache's name in order to make the end of the year accounting treatment easier and it also eliminated the \$7.00/month fee that was associated with the prior account.

APACHE GAS TRANSMISSION COMPANY, INC.

PSC CASE NO. 2024-00167

RESPONSE TO REQUEST FOR INFORMATION

PSC'S REQUEST FOR INFORMATION DATED 01/28/25

REQUEST 2

RESPONSIBLE PARTY: David Thomas Shirey, Jr.

Request 2. Provide documentation detailing the current PRP rates being charged to customers.

Response 2. Please see attached. The billing system is not able to show the breakout.

Attached is a spreadsheet that shows different customer bills along with the printout from those same customer bills that correspond to the spreadsheet.

Page 1

Burkesville Gas Company

Account Details

Account#: 00019811 Service Address: Mailng Address: KY 42717 BURKESVILLE

CUMBERLAN

Book#.Sequence: Coded Name: Owner#: 1/31 **VACANT** Meter Type: Rollover: 4 100.00 Multiplier: Pump#: No Num CF Meter Number: Units: ID#: MID:

Phone:	Master Account: No										
						Lo	ot:				
						Ble	ock:				
Income Center			Depos	_	Balance	Current	30 60		0 90	<u>90+</u>	Rate
GAS			\$150.00	-	50.18)	(\$0.18)	\$0.00		00.00	\$0.00	GC
Franchise Tax			\$0.00		0.00	\$0.00	\$0.00		00.00	\$0.00	FF
School Tax			\$0.00		0.00	\$0.00	\$0.00		00.00	\$0.00	SC
Sales Tax			\$0.00		00.00	\$0.00	\$0.00		00.00	\$0.00	SL
Cash Sales	_		\$0.00		0.00	\$0.00	\$0.00 \$0.00		0.00 0.00	\$0.00 \$0.00	C1
PRP CHARGE	E		\$0.00 \$0.00		50.18 50.00	\$0.18 \$0.00	\$0.00		50.00	\$0.00	CI
Other Penalties			\$0.00		0.00	\$0.00	\$0.00		50.00	\$0.00	
			\$150.00		50.00	\$0.00	\$0.00		50.00	\$0.00	
Reading Date	Reading	Usage	GAS		School Tax	Sales Tax	Cash Sales	PRP CHARGE	Other	<u>Penalties</u>	
1/30/2025	219,400	76,700	\$ 1,232.15	\$ 18.48	\$ 36.96	\$ 77.26	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
12/31/2024	142,700	56,900	\$ 911.57	\$ 13.67	\$ 27.35	\$ 57.16	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
11/26/2024	85,800	10,800	\$ 179.10	\$ 2.69	\$ 5.37	\$ 11.23	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
10/30/2024	75,000	4,900	\$ 85.36	\$ 1.28	\$ 2.56	\$ 5.35	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
9/26/2024	70,100	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
8/29/2024	70,100	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
7/30/2024	70,100	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
6/27/2024	70,100	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
5/30/2024	70.100	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
4/29/2024	70,100	5.100	\$ 78.96	\$ 1.18	\$ 2.37	\$ 4.95	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
3/27/2024	65.000	20,900	\$ 287.58	\$ 4.31	\$ 8.63	\$ 18.03	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
2/28/2024	44.100	27.300	\$ 373.34	\$ 5.60	\$ 11.20	\$ 23.41	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
1/30/2024	16,800	68,400	\$ 924.11	\$ 13.86	\$ 27.72	\$ 57.94	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
12/27/2023	948,400	37.600	\$ 472.84	\$ 7.09	\$ 14.19	\$ 29.65	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
11/29/2023	910,800	34,900	\$ 439.43	\$ 6.59	\$ 13.18	\$ 27.55	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
10/30/2023	875,900	8,200	\$ 108.98	\$ 1.63	\$ 3.27	\$ 6.83	\$ 0.00	\$ 3.50	\$ 0.00	\$ 1.86	

Burkesville Gas Company

Account Details .

Account#:			
00020220			
Service Address:			
Mailng Address:			
	BURKESVILLE	KY	42717

Book#.Sequence: Owner#: Coded Name: 1 /536 Meter Type: Rollover: 100.00 Multiplier: Pump#: CF Meter Number: Units: ID#:

	DOM	LOTIDU									
						<u>M</u>	ID:				
Phone:						<u>M</u>	aster Account :	No			
						Lo	ot:				
						BI	ock:				
Income Center			Depos		Balance	Current	<u>30 60</u>		0 90	<u>90+</u>	Rate
GAS			\$150.00		\$0.00	\$0.00	\$0.00		0.00	\$0.00	GC
Franchise Tax			\$0.00		\$0.00 \$0.00	\$0.00 \$0.00	\$0.00 \$0.00		0.00	\$0.00 \$0.00	FF SC
School Tax Sales Tax			\$0.00 \$0.00		\$0.00	\$0.00	\$0.00		0.00	\$0.00	SL
Cash Sales			\$0.00		\$0.00	\$0.00	\$0.00		0.00	\$0.00	SD
PRP CHARGE			\$0.00		\$0.00	\$0.00	\$0.00		0.00	\$0.00	C1
Other			\$0.00)	\$0.00	\$0.00	\$0.00	\$	0.00	\$0.00	
Penalties			\$0.00)	\$0.00	\$0.00	\$0.00	\$	0.00	\$0.00	
		=	\$150.00	==	\$0.00	\$0.00	\$0.00	\$	0.00	\$0.00	
Reading Date	Reading	Usage	GAS	Franchise Tax	School Tax	Sales Tax	Cash Sales	<u>PRP</u> CHARGE	<u>Other</u>	Penalties	
1/30/2025	841,000	40.300	\$ 650.96	\$ 9.76	\$ 19.53	\$ 40.82	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
12/31/2024	800,700	26,300	\$ 425.38	\$ 6.38	\$ 12.76	\$ 26.67	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
11/26/2024	774,400	4,900	\$ 85.36	\$ 1.28	\$ 2.56	\$ 5.35	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
10/30/2024	769.500	3,100	\$ 56.76	\$ 0.85	\$ 1.70	\$ 3.56	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
9/26/2024	766,400	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
8/29/2024	766,400	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
7/30/2024	766,400	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
6/27/2024	766,400	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
5/30/2024	766,400	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
4/29/2024	766,400	6,400	\$ 97 18	\$ 1 46	\$ 2.92	\$ 6.09	\$ 0.00	\$ 3 50	\$ 0.00	\$ 0.00	
3/27/2024	760.000	13,800	\$ 192.43	\$ 2.89	\$ 5.77	\$ 12.07	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
2/28/2024	746,200	19,600	\$ 270.16	\$ 4.05	\$ 8.10	\$ 16.94	\$ 0.00	\$ 3.50	\$ 0.00	\$ 4.54	
1/30/2024	726,600	39,800	\$ 540.85	\$ 8.11	\$ 16.23	\$ 33.91	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
12/27/2023	686,800	21,000	\$ 267.40	\$ 4.01	\$ 8.02	\$ 16.77	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
11/29/2023	665,800	12.300	\$ 159.73	\$ 2.40	\$ 4.79	\$ 10.02	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	
10/30/2023	653,500	0	\$ 7.50	\$ 0.11	\$ 0.23	\$ 0.47	\$ 0.00	\$ 3.50	\$ 0.00	\$ 0.00	

Burkesville Gas Company

Account Details

Book#.Sequence: Owner#: Coded Name: Account#: 1/314 00019525 Meter Type: Rollover: Service Address: Multiplier: 100.00 Pump#: Mailing Address: CF Meter Number: Units: BURKESVILLE KY 42717 ID#: MID: Phone: Master Account: No Lot: Block: 60 -- 90 90+ Income Center Balance Current 30 -- 60 Rate Deposit \$27.08 GR GAS \$100.00 \$27.08 \$0.00 \$0.00 \$0.00 Franchise Tax \$0.00 \$0.41 \$0.41 \$0.00 \$0.00 \$0.00 FF \$0.00 \$0.81 \$0.81 \$0.00 \$0.00 \$0.00 SC School Tax \$0.00 Sales Tax \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 Cash Sales \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 PRP CHARGE \$0.00 \$0.00 \$3.00 \$3.00 \$0.00 \$0.00 R1 Other \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$5.83 Penalties \$0.00 \$0.56 \$0.56 \$0.00 \$0.00 \$0.00 \$100.00 \$31.86 \$31.86 \$0.00 \$0.00 \$5.83 Reading Date Reading Usage Franchise School Tax PRP GAS Sales Tax Cash Sales Other **Penalties** CHARGE **Tax** 1/30/2025 171.800 1.200 \$ 27.08 \$ 0.41 \$ 0.81 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.56 \$ 0.00 12/31/2024 170,600 1,300 \$ 28.61 \$ 0.43 \$ 0.86 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 169,300 11/26/2024 1.400 \$ 30.23 \$ 0.45 \$ 0.91 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.52 10/30/2024 167,900 1.200 \$ 26.99 \$ 0.40 \$ 0.81 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 9/26/2024 166,700 1,200 \$ 26.99 \$ 0.40 \$ 0.81 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 8/29/2024 165,500 900 \$ 22.11 \$ 0.33 \$ 0.66 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 7/30/2024 164,600 800 \$ 20.49 \$ 0.31 \$ 0.61 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 6/27/2024 163,800 700 \$ 17.55 \$ 0.26 \$ 0.53 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 5/30/2024 163,100 1,000 \$ 21.86 \$ 0.33 \$ 0.66 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 4/29/2024 162.100 1,300 \$ ().79 \$ 26.17 \$ 0.39 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 3/27/2024 160,800 1.400 \$ 0.40 \$ 0.80 \$ 0.00 \$ 26.75 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 \$ 25.38 2/28/2024 159,400 1.300 \$ 0.38 \$ 0.76 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.44 158,100 1,500 \$ 28.13 \$ 0.42 \$ 0.84 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 1/30/2024 12/27/2023 156,600 1,800 \$ 30.41 \$ 0.46 \$ 0.91 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00 11/29/2023 154,800 1,300 \$ 24.04 \$ 0.36 \$ 0.72 \$ 0.00 \$ 0.00 \$ 3.00 \$ 0.00 \$ 0.00

153,500

10/30/2023

1,300 \$ 24.04

\$ 0.36

\$ 0.72

\$ 0.00

\$ 0.00

\$ 3.00

\$ 0.00

\$ 0.00

Burkesville Gas Company

Account Details

Coded Name: Book#.Sequence: Owner#: Account#: 1/36 00022310 Meter Type: Rollover: R Service Address: 100.00 Pump#: Multiplier: Mailng Address: Units: CF Meter Number: OH 43218 ID#: **COLUMBUS** MID: Master Account: No Phone: (767) 202-4851 Lot: Block: Balance Current 30 -- 60 60 - 9090+ Rate Income Center Deposit \$0.00 \$0.00 GC **GAS** \$150.00 \$2,262.12 \$2,270.00 (\$7.88)FF Franchise Tax \$0.00 \$34.05 \$34.05 \$0.00 \$0.00 \$0.00 School Tax \$0.00 \$68.10 \$68.10 \$0.00 \$0.00 \$0.00 SC Sales Tax \$0.00 \$156.24 \$142.33 \$13.91 \$0.00 \$0.00 SL \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 Cash Sales \$0.00 PRP CHARGE \$0.00 \$7.00 \$3.50 \$3.50 \$0.00 \$0.00 CI Other \$0.00 (\$9.53)\$0.00 \$0.00 \$0.00 \$16.04 \$0.00 \$38.15 \$0.00 \$0.00 Penalties \$0.00 \$38.15 \$2,556,13 \$2,556.13 \$9.53 \$0.00 \$16.04 \$150.00 PRP **Reading Date** Reading Usage **GAS** Franchise School Tax Sales Tax Cash Sales <u>Other</u> Penalties CHARGE <u>Tax</u> 1/30/2025 249,700 141,700 \$ 2,270.00 \$ 34.05 \$ 68.10 \$ 142.33 \$ 0.00 \$ 3.50 \$ 0.00 \$ 38.15 12/31/2024 108,000 106,700 \$ 1,702.84 \$ 25.54 \$ 51.09 \$ 106.77 \$ 0.00 \$ 3.50 \$ 0.00 \$ 0.00 \$ 0.00 \$ 0.00 11/26/2024 1,300 36.800 \$ 592.21 \$ 8.88 \$ 17.77 \$ 37.13 \$ 0.00 \$ 3.50 10/30/2024 964,500 28,800 \$ 465.10 \$ 6.98 \$ 29.16 \$ 0.00 \$ 3.50 \$ 0.00 \$ 0.00 \$ 13.95 9/26/2024 935,700 24,700 \$ 399.95 \$ 6.00 \$ 12.00 \$ 25.08 \$ 0.00 \$ 3.50 \$ 0.00 \$ 0.00 8/29/2024 911,000 24,800 \$ 401.54 \$ 6.02 \$ 12.05 \$ 25.18 \$ 0.00 \$ 3.50 \$ 0.00 \$ 6.99 7/30/2024 886,200 27,800 \$ 449.21 \$ 6.74 \$ 13.48 \$ 28.17 \$ 0.00 \$ 3.50 \$ 0.00 \$ 0.00 \$ 0.00 \$ 3.50 \$ 0.00 6/27/2024 858,400 24,700 \$ 353.61 \$ 5.30 \$ 10.61 \$ 22.17 \$ 0.00 \$ 5.98 833.700 27,900 \$ 398.45 \$ 11.95 \$ 0.00 \$ 0.00 5/30/2024 \$ 24.98 \$ 3.50 \$ 0.00 4/29/2024 805,800 34,600 \$ 492 34 \$ 7.39 \$ 14.77 \$ 30.87 \$ 0.00 \$ 3.50 \$ 0.00 \$ 8.50 3/27/2024 771,200 39,100 \$ 531.47 \$ 7.97 \$ 15.94 \$ 33.32 \$ 0.00 \$ 3.50 \$ 0.00 \$ 0.00 2/28/2024 732,100 60,300 \$ 815.57 \$ 12.23 \$ 24.47 \$ 51.14 \$ 0.00 \$ 3.50 \$ 0.00 \$ 1.74 1/30/2024 671,800 137,900 \$ 1,855.47 \$ 55.66 \$ 0.00 \$ 3.50 \$ 0.00 \$ 0.00 \$ 27.83 \$ 116.34 533,900 90,500 \$ 1,127.54 \$ 0.00 \$ 3.50 \$ 0.00 12/27/2023 \$ 16.91 \$ 33.83 \$ 70.70 \$ 0.00

12/21/2023

11/29/2023

443,400

443,400

\$ 7.50

72,700 \$ 907.24

\$ 0.11

\$ 13.61

\$ 0.23

\$ 27.22

\$ 0.47

\$ 56.88

\$ 0.00

\$ 0.00

\$ 3.50

\$ 3.50

\$130.90

\$ 0.00

\$ 0.00

\$ 0.37

ATTACHMENT IS AN EXCEL SPREADSHEET AND IS BEING UPLOADED SEPARATELY

PSC'S REQUEST FOR INFORMATION DATED 01/28/25 REQUEST 3

RESPONSIBLE PARTY: David Thomas Shirey, Jr.

Request 3. Provide an updated tariff sheet for the proposed PRP rates.

Response 3. Apache is not proposing to change the PRP rates in this proceeding, therefore the tariff does not need to be updated at this time. Apache provided a response that showed how the timeline would change if the PRP rate was increased, but did not request to change the PRP rate.

PSC'S REQUEST FOR INFORMATION DATED 01/28/25 REQUEST 4

RESPONSIBLE PARTY: David Thomas Shirey, Jr.

Refer to the Application filed in Case No. 2019-00032, PDF page 3 of 5 where Apache asserted that it "... believes it has four additional water crossings that will need to be replaced in the near future." Provide the name and location of each of the referenced fours additional water crossings.

Response 4. After filing Apache's 2019 PRP Annual Update with the Commission,

Apache made system repairs made at water crossing locations including:

• Spoon Branch:

- Directionally bored 180 feet of high-density plastic gas line, upgrading from 3" to
 6". This section of main replacement began in late 2020 and completed early
 2021.
- Directionally bored 120 feet of high-density plastic gas line, upgrading from 1.25" to 2". This section of main replacement began in late 2020 and completed early 2021.

• Dutch Creek:

Directionally bored 120 feet of 2" high-density plastic gas line, to serve as a casing for a 0.75" gas line under Dutch Creek from a upstream field regulator.

This water crossing repair began and ended in 2023.

These three water crossings have been repaired. Please see the response to 5b below for information regarding the fourth water crossing.

Apache submitted its response to the Commission Staff's Second Request for Information Item No. 2 in this proceeding on October 16, 2024. That response details additional locations requiring replacement, due to erosion at water crossing locations.

PSC'S REQUEST FOR INFORMATION DATED 01/28/25

REQUEST 5

RESPONSIBLE PARTY: David Thomas Shirey, Jr.

Request 5. State whether Apache ever replaced any or all of the four additional water crossings that were similar to Marrowbone Creek.

- a. If so, identify the water crossings that were replaced, include a description of when each replacement project began and ended.
- b. For any of the four additional water crossings that were not replaced, provide the status of the replacement project of each water crossings.

Response 5. Apache has replaced three sections of gas line at water crossings like the Marrowbone Creek repair since each was a water crossing but were not the same as Marrowbone Creek in every respect.

Response 5a. Please refer to Response 4 above detailing system repairs made at water crossing locations to date.

Response 5b. There is a water crossing that has not been replaced on the combined Apache Gas Transmission Company/Burkesville Gas Company system. It is the Cumberland River crossing. However, the Cumberland River crossing is currently owned by Burkesville Gas Company. We are currently determining the cost to replace this section with a directional bore under the Cumberland River and if Apache Gas Transmission Company own the new directional bore under the Cumberland River and allow Burkesville to use that section to deliver natural gas

to the customers on the east side of the Cumberland River so that PRP revenue could be used also to replace this section. It also needs to be determined if Apache can use PRP revenue to pay for professional fees for the planning and implementation of main replacements.

APACHE GAS TRANSMISSION COMPANY, INC. PSC CASE NO. 2024-00167

RESPONSE TO REQUEST FOR INFORMATION

PSC'S REQUEST FOR INFORMATION DATED 01/28/25

REQUEST 6

RESPONSIBLE PARTY:

David Thomas Shirey, Jr.

Request 6. Refer to Apache's Application filed in Case No. 2017-00168, wherein Apache stated, "[t]he two remaining sections that are in need of repair, as noted in the 2014 Inspection Report, are the Cliff Norris Section and the Doug Lewis Section B."

- a. Confirm whether Apache has fully completed the "Cliff Norris Section" and "Doug Lewis Section B" repairs.
- b. If Apache has not fully repaired the "Cliff Norris Section" and "Doug Lewis Section B" section, provide the repair status for each and Apache's current plan of action to fully complete repairs.

Response 6a. Please see Case No. 2020-00067. Exhibit A to Apache's Annual PRP Report, which was filed on March 2, 2020, shows that both the Cliff Norris Section and the Doug Lewis Section B was completely repaired at the time of the March 2, 2020 filing. In addition, Exhibit C to that same filing provides the PRP costs associated with each of these projects.

Response 6b. Please see Case No. 2020-00067 and Response 6a. above.

PSC'S REQUEST FOR INFORMATION DATED 01/28/25

REQUEST 7

RESPONSIBLE PARTY: David Thomas Shirey, Jr.

Request 7. Refer to Apache's Application filed in Case No. 2017-00168, wherein Apache stated, "Apache Gas is also proposing to repair the Allen Creek Road Drainage Ditch Section as part of this PRP."

- a. Confirm whether Apache has fully repaired the "Allen Creek Road Drainage Ditch" section.
- b. If Apache has not fully repaired the "Allen Creek Road Drainage Ditch" section, provide the current repair status for it and Apache's current plan of action to fully complete repairs.

Response 7a. Please see Case No. 2020-00067, specifically Exhibit A to the Annual PRP Report filed on March 2, 2020. As provided on page 2 of Exhibit A the Allen Creek Road Drainage Ditch Section was completed. Exhibit C to that same filing provided the PRP cost summary for each of the projects, including the Allen Creek Road Drainage Ditch Section.

Response 7b. Please see Case No. 2020-00067 and Response 7a. above.