

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 20, 2024

1. Refer to the Application, safety modification and replacement program (SMRP) Form 2.2. This exhibit lists "PSC FEES" on lines 2 and 3. Confirm that line 2 should be uncollectible accounts expense.

RESPONSE:

Confirmed. Line 2 description should be "uncollectible expense". However, the rate used is the correct rate for uncollectible expense.

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2. Refer to the Application, SMRP Form 3.0, page 2. State whether any portion of 2024 are actuals or updated estimates.

RESPONSE:

The 2024 SMRP Plant activity aligns with the estimated 2024 data that was included in last year's October SMRP filing (Case No 2023-00335).¹ There are no updated estimates or actuals included for the 2024 activity.

In Columbia's March 22, 2024 response to Case No. 2023-00335 KY PSC Staff Data Request Set 2, No, 2, the Company indicated it would discontinue the partial year update of current year work in future October filings. Rather the actual monthly plant activity will only be updated in the March Balancing Adjustment filings going forward. Columbia followed this commitment in its application in this case.

This process makes the validation of the October filings more efficient as the estimated plant activity can be verified with the prior October SMRP filing.

¹ Case No. 2023-00335, *In the Matter of the Electronic Application of Columbia Gas of Kentucky, Inc for its Annual Safety Modification and Replacement Program Filing.*

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3. Refer to the Proposed 2025 SMRP Project List, page 2 of 2.
 - a. Explain why the bare steel projects were not completed in 2024.
 - b. Explain in greater detail what bare steel pipe would be replaced under scattered services. Include specific locations and pipe lengths.
 - c. Explain whether the leak repairs involved replacement of the pipe or addressing leaks in a different manner. If a leak repair resulted in a pipe replacement, for the year 2024, provide a list of each instance of pipe replacement and the length of pipe replaced. If included as an originally approved SMRP project, note that as well.

RESPONSE:

- A. There are several variables that impact Columbia's ability to complete projects. These include, but are not limited to, weather; resource availability (including personnel, materials, and supplies); permitting; timing of state and local

government projects; and physical constraints (for example, there are instances where construction crews encounter unanticipated or difficult geological conditions).

B. The bare steel pipes replaced under "scattered services" are those that connect Columbia's gas main (usually in the street or public right-of-way) to the customer's gas meter. These pipes typically have diameters ranging from ½" to 2" and vary in length, averaging approximately 100 feet. These services are not part of a specific project; rather, they are typically replaced due to leakage caused by corrosion that cannot be repaired. The replacements are distributed throughout Columbia's service territory, hence the term "scattered services."

C. The line item "Leakage Repairs requiring main Replacement" in the 2025 SMRP Project List represents a budget for replacements that result from discovered leaks throughout the year, and are not tied to specific SMRP projects planned at the time of the October SMRP filing. The amount listed represents a budget for 2025 replacement of pipe, not leakage repair.

Please see the list below for 2024 projects that fall within this category. The work was included in the approved 2024 Project List in the same manner, that is, as a

budget line item "Leakage Repairs requiring main Replacement".

| Row Labels |
|-----------------------------------|
| 23026309100 |
| EMER-INSTALL 4'OF 2"PMMP MAIN |
| 23026309300 |
| EMER - INSTALL 5'-4" PMMP |
| 24026310000 |
| EMER-INSTALL 4' OF 2"PMIP MAIN |
| 24026311800 |
| EMER-INSTALL 5' OF 2"PMMP MAIN |
| 24026314000 |
| EMER-INSTALL 5' OF 4"PMMP MAIN |
| 24026314600 |
| EMER-INSTALL 170' OF 2"/4"PMMP |
| 24026316000 |
| EMER - INSTALL 2'-3" PMLP |
| 24026316500 |
| EMER - INSTALL 15'-2" PMMP |
| 24026317800 |
| EMER - INSTALL 5'-2" PMIP |
| 24026318600 |
| EMER - INSTALL 11' OF 2" PMMP |
| 24026320800 |
| EMER - INSTALL 5'-3" PMIP |
| 24026328300 |
| EMER - INSTALL 26'-6" PMLP |
| 24026329400 |
| EMER - INSTALL 2'-3" PMLP |
| 24026329700 |
| EMER - 2'-2" PMMP |
| 24026330300 |
| EMER - INSTALL 5'- 2" PMMP |
| 24026331100 |
| EMER - INSTALL ~5'-2" PMMP |
| 24026331900 |
| EMER - INSTALL 1' OF 2"PMMP |
| 24026332600 |
| EMER INSTALL 10'-6" PMMP |
| 24026332800 |
| EMER - INSTALL 5'-4" PMIP |

24026333000

EMER-INSTALL 18'-4" PMLP MAIN

24026335100

EMER - INSTALL 4'-3" PMMP

24026335400

EMER - INSTALL 2'-2" PMMP

24026336800

EMER - INSTALL 5' OF 2" PMMP

24026338200

EMER - INSTALL 5'-3" PMMP

24026342000

EMER - INSTALL 2' OF 2" PMMP

24026343700

EMER - INSTALL 3'-3" PMMP

24026344300

EMER-INSTALL 6' OF 4" PMIP

24026346300

EMER-INSTALL 3' OF 2" PMMP
MAIN

24026346600

EMER-INSTALL 8' OF 4" PMLP

24026347300

EMER - INSTALL 12'-3" PMIP

24026347600

EMER - INSTALL 7'-2" PMIP

24026348000

EMER-INSTALL 4' OF 3" PMMP
MAIN

24026348700

EMER - INSTALL 5' OF 2" PMMP

24026349700

EMER INSTALL 2' OF 2" PMMP

24026349900

EMER - INSTALL 3'-2" PMMP

24026351400

EMER - INSTALL 2'-2" PMMP

24026351600

EMER - INSTALL 2'-2" PMMP

24026351800

EMER-INSTALL 8' OF 3" PMMP

24026352600

EMER - INSTALL 2'-2" PMMP

24026353200

EMER - INSTALL 3'-4" PMMP

24026355400

EMER-INSTALL 2' OF 2" PMMP
MAIN

24026356500

EMER - INSTALL 2'-2" PMIP

24026357000

EMER-INSTALL 50' OF 4"PMLP

24026357700

EMER-INSTALL 2' OF 3"PMMP

MAIN

24026360200

EMER-INSTALL 3' OF 2"PMMP

MAIN

24026361500

EMER - INSTALL 2'-3" PMLP

24026362000

EMER-INSTALL 3' OF 3"PMMP

MAIN

24026365000

EMER-INSTALL 10' - 2" PMMP

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4. Explain what factors went into Columbia Kentucky's choice of projects for the 2025 planning period.

RESPONSE:

The Company uses a probabilistic risk assessment ("PRA") tool to assess and prioritize pipeline segments for inclusion in the 2025 project list.

Synergi Pipeline is the software tool used to assess and prioritize PRA risk for the Company's assets. That information is fed into Uptime MRP as a tool to select pipe segments for replacement. In 2022, the Company transitioned from using Optimain DS to Synergi Pipeline and Uptime MRP (now known as Synergi MRP) as the risk assessment tools that assess and prioritize mains and services for replacement.¹

The results are supplemented with other relevant information, that is not included in the

¹ The reason behind this change is explained in the Direct Testimony of David Roy in Case No. 2021-00183, *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; Issuance of a Certificate of Public Convenience and Necessity; and Other Relief* (May 28, 2021).

PRA, including input from:

- Local Operations
- State and Municipal Governments
- Gas Operations and Gas Systems Planning

Using all of this data, the Company's Engineering department designs projects for inclusion in the SMRP Project List.

This comprehensive approach, which uses information from multiple sources as well as sound engineering judgment, enables the Company to allocate its available resources in a manner that achieves the maximum reduction in risk over both the short and long term.

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5. Assuming all proposed projects for 2025 are completed as planned, state how many miles of bare steel pipe Columbia Kentucky will still need to replace. Include in the response a safety ranking for each remaining project. Provide a key for the ranking.

RESPONSE:

Columbia projects to have approximately 270 miles of bare steel main remaining at the end of 2024. Assuming all proposed projects for 2025 are completed as planned, Columbia expects to have approximately 256 miles remaining. Columbia has not designed projects for segments of the remaining miles of known eligible pipe. Please refer to Columbia's Response to Commission Staff's First Request for Information No. 8 for a description of the manner in which Columbia sets the SMRP Budget. Future projects will be designed, in the year prior to replacement, once the capital allocation process is completed and the SMRP budget is set for that upcoming year.

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6. Refer to Case No. 2024-00092,2 Direct Testimony of David Roy at 9-10. Explain whether the SMRP is the sole recovery mechanism for the Accelerated Mainline Replacement Program. If not, provide any other sources.

RESPONSE:

Yes; the SMRP is the sole recovery mechanism for the Accelerated Mainline Replacement Program.

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7. For the years 2023 and 2024, provide a list of completed pipeline replacement projects. For each project, describe whether this project was included in the capital projects in Columbia Kentucky's budget. If not, describe how the Columbia Kentucky funded each project listed.

RESPONSE:

Please refer to KY PSC Case No. 2024-00328 Staff 1-7 Attachment A for a list of all completed pipeline replacement projects. Each of these projects were included in Columbia's capital budget.

| Job Order | Project Id | Job Summary | Complete Dt | Footage | Completed Yr |
|-------------|------------|--------------------------------|-------------|---------|--------------|
| 17026724700 | 1747593 | RETIRE 350' - 3" PMLP | 03-01-2024 | | 2024 |
| 18026793901 | 1855482 | INSTALL 4,123' - 2" PMMP | 12-07-2023 | 4,140 | 2023 |
| 18026794000 | 1855482 | RETIRE 4748'-2"/3"/4"/6"P-BSLP | 12-07-2023 | | 2023 |
| 18026795501 | 1855582 | INSTALL 14,600'-2,4,6,8" PMMP | 11-15-2024 | 14,165 | 2024 |
| 18026795600 | 1855582 | RETIRE 714' - 6" BSMP | 11-15-2024 | | 2024 |
| 19026913000 | 1968534 | INSTALL 730'-2"PMMP | 03-26-2024 | 689 | 2024 |
| 19026913100 | 1968534 | RETIRE 705'-2/3/4" BS/PL/CSLP | 03-26-2024 | | 2024 |
| 20026952500 | 2072290 | REPLACE VALVE C-16 | 02-07-2023 | 29 | 2023 |
| 20026952600 | 2072290 | RETIRE VALVE C-16 | 02-07-2023 | | 2023 |
| 20026968700 | 2073961 | EMER - INSTALL 5' - 2" PMIP | 08-25-2023 | 2 | 2023 |
| 20026968800 | 2073961 | EMER - RETIRE 5' - 2" PMIP | 08-25-2023 | | 2023 |
| 20026974601 | 2074544 | INSTALL 6,500'-4"PMLP | 10-13-2023 | 6,647 | 2023 |
| 20026974700 | 2074544 | RETIRE 6,900'-BSLP,CSLP,PLP | 12-21-2023 | | 2023 |
| 20026978100 | 2074850 | INSTALL 8620' - 2" PMMP | 11-27-2023 | 9,303 | 2023 |
| 20026978200 | 2074850 | RETIRE 8983' LP - 2520' BS | 11-27-2023 | | 2023 |
| 20026983500 | 2075305 | INSTALL 1670' - 2" PMMP | 08-28-2023 | 1,805 | 2023 |
| 20026983600 | 2075305 | ABANDON 1667'-2/3/4" PMLP/BSLP | 08-28-2023 | | 2023 |
| 21026115500 | 2179094 | INSTALL 9560' OF 2"PMMP | 06-30-2023 | 8,771 | 2023 |
| 21026115600 | 2179094 | RETIRE 9,590' OF BSLP & OTHER | 06-30-2023 | | 2023 |
| 21026127000 | 2180423 | INSTALL 8021'-2"&4" PMIP | 06-07-2023 | 8,100 | 2023 |
| 21026127100 | 2180423 | RETIRE 9400'-2"&4" BS&CS | 06-07-2023 | | 2023 |
| 21026130200 | 2180888 | EMER-INSTALL 5'-2" PMIP/CSIP | 03-31-2023 | 6 | 2023 |
| 21026130300 | 2180888 | EMER-RETIRE 5'-2" BSIP | 03-31-2023 | | 2023 |
| 21026130400 | 2180320 | INSTALL 25,111'-2",4" PMMP | 12-05-2023 | 23,540 | 2023 |
| 21026130500 | 2180320 | RETIRE 25,000' OF BSLP MAINS | 12-05-2023 | | 2023 |
| 21026140501 | 2292377 | INSTALL 1,985'-6" CSHP | 05-19-2023 | 1,874 | 2023 |
| 21026140600 | 2292377 | RETIRE 2,598'- 6" BSHP | 05-19-2023 | | 2023 |
| 21026145601 | 2183195 | INSTALL 1885' - 4" PMMP MAIN | 03-18-2024 | 1,874 | 2024 |
| 21026145700 | 2183195 | RETIRE 1840' OF 4" BSMP | 03-14-2024 | | 2024 |
| 21026152101 | 2075431 | INSTALL 535' OF 8"CSHP MAIN | 10-31-2024 | 556 | 2024 |
| 21026152200 | 2075431 | RETIRE 457' OF 6 5/8"BSHP MAIN | 10-31-2024 | | 2024 |
| 21026154800 | 2180320 | RETIRE 35'-3" CSMP | 12-05-2023 | | 2023 |
| 21026997801 | 2177145 | INSTALL 4600' OF 2"/6"PMMP | 10-19-2023 | 4,887 | 2023 |
| 21026997900 | 2177145 | RETIRE 6300' OF 4"/6"CILP MN | 10-19-2023 | | 2023 |
| 22026158800 | 2285539 | INSTALL 540' OF 4"/8"PMMP MAIN | 03-03-2023 | 553 | 2023 |
| 22026158900 | 2285539 | RETIRE 594' OF 8"BSMP MAIN | 03-03-2023 | | 2023 |
| 22026162102 | 2286046 | INSTALL 8150' OF 2"/4"PMMP | 11-30-2023 | 7,928 | 2023 |
| 22026162200 | 2286046 | RETIRE 4600' OF 4"/6"BSLP MAIN | 11-30-2023 | | 2023 |
| 22026163200 | 2286252 | INSTALL 775' OF 2"PMMP MAIN | 03-17-2023 | 702 | 2023 |

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|-------------|---------|--------------------------------|------------|--------|------|
| 22026163300 | 2286252 | RETIRE 800' OF 4"BSLP MAIN | 03-17-2023 | | 2023 |
| 22026164000 | 2286363 | INSTALL 5,100'-2" PMMP | 04-10-2024 | 5,143 | 2024 |
| 22026164100 | 2286363 | RETIRE 6,711'-BS/CS IP | 04-10-2024 | | 2024 |
| 22026164201 | 2286366 | INSTALL 2,300'-2" PMMP | 08-03-2023 | 2,210 | 2023 |
| 22026164300 | 2286366 | RETIRE 3,574'-BSLP | 08-03-2023 | | 2023 |
| 22026165501 | 2286440 | INSTALL 3385' OF 2" PMMP | 09-13-2024 | 3,336 | 2024 |
| 22026165600 | 2286440 | RETIRE 2715'-BSLP & 425'-PLP | 09-13-2024 | | 2024 |
| 22026166900 | 2286441 | INSTALL 2010' - 8" & 6" PMMP | 12-19-2023 | 1,910 | 2023 |
| 22026167000 | 2286441 | RETIRE 2260' OF 4-8" BSLP | 12-19-2023 | | 2023 |
| 22026167200 | 2286524 | INSTALL 720'- 4" PMMP | 02-13-2023 | 754 | 2023 |
| 22026167300 | 2286524 | RETIRE 720'-4" BS-LP | 02-13-2023 | | 2023 |
| 22026168600 | 2286608 | INSTALL 13,800'-2"PMMP | 09-08-2023 | 11,202 | 2023 |
| 22026168700 | 2286608 | RETIRE 12,327'-BSLP,CSLP,PLP | 09-08-2023 | | 2023 |
| 22026170600 | 2286853 | INSTALL 7,200'-2"/4" PMMP | 09-22-2023 | 7,917 | 2023 |
| 22026170700 | 2286853 | RETIRE BSLP | 09-22-2023 | | 2023 |
| 22026171100 | 2286912 | INSTALL 2715' OF 2"/4"PMMP | 05-23-2024 | 2,595 | 2024 |
| 22026171200 | 2286912 | RETIRE 2300' OF 3"/6"BSLP | 05-22-2024 | | 2024 |
| 22026171800 | 2286937 | INSTALL 3178'-2" PMIP | 07-20-2023 | 2,949 | 2023 |
| 22026171900 | 2286937 | RETIRE ~3325'-2" BS,CS & P | 07-20-2023 | | 2023 |
| 22026172301 | 2286985 | INSTALL 5000' OF 2"PMMP MAIN | 04-26-2024 | 4,923 | 2024 |
| 22026172400 | 2286985 | RETIRE 4792'-2/4/8" PL/CS/BSLP | 04-26-2024 | | 2024 |
| 22026175100 | 2184598 | INSTALL 3" OUTLET VALVE | 05-24-2023 | 14 | 2023 |
| 22026175200 | 2184598 | RETIRE ~10' - 3" CSHP | 05-24-2023 | | 2023 |
| 22026178900 | 2287856 | INSTALL 620' OF 12"CSHP MAIN | 06-30-2023 | 590 | 2023 |
| 22026179100 | 2287856 | RETIRE 520' OF 12"MJBSHP | 06-30-2023 | | 2023 |
| 22026180700 | 2288081 | EMER - INSTALL 3'-3" PMIP | 08-25-2023 | 4 | 2023 |
| 22026180800 | 2288081 | EMER - RETIRE 3'-3" PMIP | 08-25-2023 | | 2023 |
| 22026183100 | 1968251 | INSTALL 3090' OF 2-4" PMMP | 09-08-2023 | 3,183 | 2023 |
| 22026183200 | 1968251 | RETIRE 3765' OF 2-4" CS & PMMP | 09-08-2023 | | 2023 |
| 22026183301 | 1968251 | SMRP INSTALL 1120' 8-12" CSHP | 03-06-2024 | 1,101 | 2024 |
| 22026183400 | 1968251 | RETIRE 702' OF 6" BSHP | 03-06-2024 | | 2024 |
| 22026184800 | 2181472 | INSTALL 3775'-2" PMMP | 04-12-2023 | 4,210 | 2023 |
| 22026184900 | 2181472 | RETIRE 3315'-2"&4"BSLP | 04-12-2023 | | 2023 |
| 22026205800 | 2286853 | RETIRE 20'-2" PMP | 09-18-2023 | | 2023 |
| 22026207100 | 2289651 | INSTALL 7870'-2", 4" PMMP | 10-28-2024 | 7,580 | 2024 |
| 22026207200 | 2289651 | RETIRE 6009'-2",3", 4" LP | 10-28-2024 | | 2024 |
| 22026213000 | 2286441 | RETIRE 2015'-8/4/2" BSMP/CSMP | 12-19-2023 | | 2023 |
| 22026219400 | 2290930 | INSTALL 380' OF 4"PMMP MAIN | 06-08-2023 | 494 | 2023 |
| 22026219500 | 2290930 | RETIRE 380' OF 4"BSMP MAIN | 06-08-2023 | | 2023 |
| 22026223700 | 2184394 | INSTALL 1296'-2"&4" PMMP | 04-24-2023 | 1,430 | 2023 |
| 22026223800 | 2184394 | RETIRE 1212'-2",3"&4" CSMP | 04-24-2023 | | 2023 |
| 22026223900 | 2183057 | INSTALL 1067'-4" PMMP | 02-10-2023 | 1,095 | 2023 |
| 22026224000 | 2183057 | RETIRE 1150'-4" PMMP | 02-10-2023 | | 2023 |

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|-------------|---------|--------------------------------|------------|--------|------|
| 22026224201 | 2291708 | INSTALL 2300' OF 2"/4"PMMP | 09-16-2024 | 2,283 | 2024 |
| 22026224300 | 2291708 | RETIRE 4500' OF 6"/4"BSLP MAIN | 09-23-2024 | | 2024 |
| 22026225400 | 2291968 | INSTALL APROX 180'-6" PMLP | 08-21-2023 | 215 | 2023 |
| 22026225500 | 2291968 | RETIRE 200' - 6" BSLP | 08-21-2023 | | 2023 |
| 22026228201 | 2292377 | INSTALL 4,225'-2"/6" PMMP | 05-22-2023 | 3,901 | 2023 |
| 22026228300 | 2292377 | RETIRE 6,106'- LP MAIN | 05-19-2023 | | 2023 |
| 22026228400 | 2292377 | RETIRE 1133'- MP MAIN | 05-04-2023 | | 2023 |
| 22026228500 | 2290202 | INSTALL 167'-2" PMMP | 06-20-2024 | 258 | 2024 |
| 22026228600 | 2290202 | RETIRE 136'-2" PMMP | 06-20-2024 | | 2024 |
| 22026230301 | 2292664 | INSTALL 1,725'-2" PMMP | 03-17-2023 | 1,842 | 2023 |
| 22026230400 | 2292664 | RETIRE 5,578' - IP MAIN | 03-17-2023 | | 2023 |
| 22026230500 | 2292664 | RETIRE 1,368' - MP MAIN | 03-17-2023 | | 2023 |
| 22026231301 | 2292814 | INSTALL 925' OF 2"PMMP MAIN | 09-20-2024 | 815 | 2024 |
| 22026231400 | 2292814 | RETIRE 975' OF 8"BSLP MAIN | 09-20-2024 | | 2024 |
| 22026235300 | 2293486 | INST 1865'-8" & 390'-2" PMMP | 06-11-2024 | 2,215 | 2024 |
| 22026235400 | 2293486 | RETIRE 2111'- 2",4",6",8" BSMP | 06-11-2024 | | 2024 |
| 22026236700 | 2293506 | INSTALL 134'-4" PMLP | 02-27-2024 | 160 | 2024 |
| 22026236800 | 2293506 | RETIRE 130'-4" PLP | 02-27-2024 | | 2024 |
| 22026236901 | 2293665 | INSTALL 11300'-2" PMMP | 10-21-2024 | 11,185 | 2024 |
| 22026237000 | 2293665 | ABDN~8924'-2",3",4" BS,CS,P LP | 10-21-2024 | | 2024 |
| 22026237801 | 2293704 | INSTALL 4,100'-2" PMMP | 02-27-2024 | 4,299 | 2024 |
| 22026237900 | 2293704 | RETIRE 5,265' IP MAIN | 02-27-2024 | | 2024 |
| 22026241500 | 2294097 | INSTALL 40'-2" PMMP | 03-23-2023 | 25 | 2023 |
| 22026241600 | 2294097 | RETIRE 30'-2" PMMP | 03-21-2023 | | 2023 |
| 22026241701 | 2294169 | INSTALL 1425' OF 2"PMMP MAIN | 05-08-2024 | 1,425 | 2024 |
| 22026241800 | 2294169 | RETIRE 1175' OF 3"/4"BSLP MAIN | 05-07-2024 | | 2024 |
| 22026241900 | 2294177 | INSTALL 249'-2" PMIP | 03-15-2023 | 284 | 2023 |
| 22026242000 | 2294177 | RETIRE 135'-3" BSIP | 03-15-2023 | | 2023 |
| 22026242301 | 2288144 | INSTALL 8"POLY VALVE W/10"SPH | 09-07-2023 | 12 | 2023 |
| 22026242600 | 2288144 | INSTALL 500' - 4" PMMP | 05-26-2023 | 524 | 2023 |
| 22026242700 | 2294344 | INSTALL 350' OF 8"CSHP MAIN | 08-31-2023 | 385 | 2023 |
| 22026242800 | 2294344 | RETIRE 326' OF 8"CSHP MAIN | 08-31-2023 | | 2023 |
| 22026245300 | 2294549 | EMER - INSTALL 5'-2" PMMP | 01-19-2023 | 3 | 2023 |
| 22026245400 | 2294549 | EMER - RETIRE 5'-2" PMMP | 01-19-2023 | | 2023 |
| 23026246401 | 2394661 | INSTALL 3100' OF 2"PMMP MAIN | 05-22-2023 | 2,905 | 2023 |
| 23026246500 | 2394661 | RETIRE 2400' OF 4"BS/CSLP MAIN | 05-22-2023 | | 2023 |
| 23026246800 | 2394672 | INSTALL 800'-4" PMMP | 04-19-2023 | 409 | 2023 |
| 23026246900 | 2394672 | RETIRE 1000'-4" P-MP | 04-19-2023 | | 2023 |
| 23026247100 | 2394691 | EMER - INSTALL 9'-4" CSMP/PMP | 01-31-2023 | 9 | 2023 |
| 23026247200 | 2394691 | EMER - RETIRE 9'-4" CSMP | 01-31-2023 | | 2023 |
| 23026248200 | 2394810 | EMER - INSTALL 2'-2" PMMP | 01-11-2023 | 2 | 2023 |
| 23026248300 | 2394810 | EMER - RETIRE ~2'-2"PMP | 01-11-2023 | | 2023 |
| 23026248400 | 2394820 | EMER-INSTALL 3' OF 2"PMMP MAIN | 01-18-2023 | 4 | 2023 |

| | | | | | |
|-------------|---------|--------------------------------|------------|-------|------|
| 23026248500 | 2394820 | EMER-RETIRE 3' OF 2"PMMP MAIN | 01-18-2023 | | 2023 |
| 23026248600 | 2395165 | RETIRE 3'-3" PMLP | 01-25-2023 | | 2023 |
| 23026248700 | 2394873 | INSTALL 2" SS | 03-22-2023 | | 2023 |
| 23026248800 | 2394873 | RETIRE 50' - 2" CSMP | 03-22-2023 | | 2023 |
| 23026248900 | 2394889 | INSTALL 100' OF 2"PMMP MAIN | 02-03-2023 | 115 | 2023 |
| 23026249000 | 2394889 | RETIRE 86' OF 2"CSMP MAIN | 02-09-2023 | | 2023 |
| 23026249300 | 2394938 | EMER-INSTALL 5' OF 2"PMMP | 01-18-2023 | 3 | 2023 |
| 23026249400 | 2394938 | EMER-RETIRE 5' OF 2"PMMP MAIN | 01-17-2023 | | 2023 |
| 23026249600 | 2394770 | PM- DE ILI PH 2 JIM BEAM INST | 01-27-2023 | 22 | 2023 |
| 23026249700 | 2394770 | PM- DE ILI PH 2 JIM BEAM ABAN | 01-27-2023 | | 2023 |
| 23026251800 | 2184527 | RETIRE 900' OF 2"CSHP MAIN | 08-07-2023 | | 2023 |
| 23026252000 | 2395041 | EMER-INSTALL 3' OF 6"PMMP MAIN | 02-03-2023 | 3 | 2023 |
| 23026252100 | 2395041 | RETIRE 3' OF 6"PMP MAIN | 02-03-2023 | | 2023 |
| 23026252200 | 2395042 | EMER-INSTALL 3' OF 4"PMMP MAIN | 02-02-2023 | 3 | 2023 |
| 23026252300 | 2395042 | EMER-RETIRE 3' OF 4"PAMP MAIN | 02-02-2023 | | 2023 |
| 23026252600 | 2395075 | INSTALL 3' OF 4"PMLP MAIN | 01-25-2023 | 5 | 2023 |
| 23026252700 | 2395075 | RETIRE 69' OF 4"BSLP MAIN | 01-25-2023 | | 2023 |
| 23026254400 | 2294344 | INSTALL 420' OF 6"PMMP MAIN | 08-31-2023 | 426 | 2023 |
| 23026254500 | 2294344 | RETIRE 356' OF 6"PMMP MAIN | 08-31-2023 | | 2023 |
| 23026254900 | 2395330 | INSTALL 620' OF 8"CSHP MAIN | 07-19-2024 | 646 | 2024 |
| 23026255000 | 2395330 | RETIRE 620' OF 8"CSHP MAIN | 07-18-2024 | | 2024 |
| 23026256000 | 2291968 | INSTALL 800'OF 2"PMMP MAIN | 07-27-2023 | 724 | 2023 |
| 23026258600 | 2395600 | EMER - INSTALL 5'-4" PMIP | 06-14-2023 | 3 | 2023 |
| 23026258700 | 2395600 | EMER- RETIRE 5'-4" PMIP | 06-13-2023 | | 2023 |
| 23026259000 | 2395609 | EMER-INST 85'-4"PMMP MND311494 | 02-20-2023 | 85 | 2023 |
| 23026259100 | 2395609 | EMER-RETIRE 85' OF 4"PAMP MAIN | 02-20-2023 | | 2023 |
| 23026262200 | 2395693 | EMER - INSTALL 4'-2" PMMP | 03-03-2023 | 4 | 2023 |
| 23026262300 | 2395693 | EMER - RETIRE 4'-2" PMMP | 03-03-2023 | | 2023 |
| 23026262700 | 2395746 | EMER-INSTALL 5' OF 2"PMMP MAIN | 03-07-2023 | 5 | 2023 |
| 23026262800 | 2395746 | EMER-RETIRE 5' OF 2"PMP MAIN | 03-07-2023 | | 2023 |
| 23026263000 | 2395762 | INSTALL 5875' OF 2"/4"PMMP ENV | 09-12-2023 | 6,739 | 2023 |
| 23026263100 | 2395762 | RETIRE 6090' OF 4"BSMP MAIN | 09-12-2023 | | 2023 |
| 23026263400 | 2395811 | INSTALL 40'-4" PMMP | 04-11-2023 | 27 | 2023 |
| 23026263500 | 2395811 | RETIRE 20'-4" PMMP | 04-11-2023 | | 2023 |
| 23026264300 | 2395897 | EMER-INSTALL 5' OF 4"PMMP MAIN | 03-10-2023 | 3 | 2023 |
| 23026264400 | 2395897 | EMER-RETIRE 520'- 4"PAIP MAIN | 03-10-2023 | | 2023 |
| 23026264500 | 2395955 | EMER - INSTALL ~5'-4" PM/CSMP | 08-25-2023 | 5 | 2023 |
| 23026264600 | 2395955 | EMER - RETIRE ~5'-4" CSMP | 08-25-2023 | | 2023 |
| 23026264700 | 2395969 | INSTALL 100' OF 3"PMLP MAIN | 04-19-2023 | 100 | 2023 |
| 23026264800 | 2395969 | RETIRE 100' OF 3"BSLP MAIN | 04-19-2023 | | 2023 |
| 23026265100 | 2396017 | INSTALL 10'-3"PMLP | 06-02-2023 | 10 | 2023 |
| 23026265200 | 2396017 | RETIRE 10'-3" BSLP | 06-02-2023 | | 2023 |
| 23026265400 | 2396041 | EMER - INSTALL 12' - 2" PMMP | 04-06-2023 | 12 | 2023 |

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|-------------|---------|--------------------------------|------------|-----|------|
| 23026265500 | 2396041 | EMER - RETIRE 12' - 2" PMMP | 04-06-2023 | | 2023 |
| 23026265600 | 2396051 | EMER - INSTALL 4'-6" PMIP | 08-26-2023 | 4 | 2023 |
| 23026265700 | 2396051 | EMER - RETIRE 4'-6" P-IP | 08-25-2023 | | 2023 |
| 23026266300 | 2396224 | EMER-INSTALL 3' OF 2"PMMP MAIN | 02-22-2023 | 3 | 2023 |
| 23026266400 | 2396224 | EMER-RETIRE 3' OF 2"PMP MAIN | 02-22-2023 | | 2023 |
| 23026266800 | 2396250 | EMER - INSTALL 7'-2" PMMP | 04-05-2023 | 7 | 2023 |
| 23026266900 | 2396250 | EMER - RETIRE 7'-2" PMAP | 04-05-2023 | | 2023 |
| 23026267000 | 2396253 | EMER - INSTALL 2'-2" PMLP | 04-05-2023 | 2 | 2023 |
| 23026267100 | 2396253 | EMER - RETIRE 2'-2" PLP | 04-05-2023 | | 2023 |
| 23026267200 | 2396254 | INSTALL 60'-4" PMLP | 03-28-2024 | 89 | 2024 |
| 23026267300 | 2396254 | RETIRE ~60'-4" BSLP | 03-28-2024 | | 2024 |
| 23026267700 | 2396286 | EMER-RETIRE 40' OF 6"BSLP MAIN | 03-16-2023 | | 2023 |
| 23026268100 | 2396353 | RETIRE MAIN - LEAKAGE | 04-12-2023 | | 2023 |
| 23026268200 | 2396396 | INSERT 160' OF 3"PMLP MAIN | 04-14-2023 | 165 | 2023 |
| 23026268300 | 2396396 | RETIRE 160' OF 4"BSLP MAIN | 04-13-2023 | | 2023 |
| 23026268500 | 2394770 | PM-DE LINE ILI PH 2 BEND 260 | 06-16-2023 | 30 | 2023 |
| 23026268600 | 2394770 | PM-DE LINE ILI PH2 DENT 36 | 06-03-2023 | 18 | 2023 |
| 23026268700 | 2394770 | PM-DE LINE PH 2 DENT 2/STPL 3 | 05-23-2023 | 25 | 2023 |
| 23026269000 | 2396485 | EMER-INSTALL 4' OF 2"PMMP MAIN | 03-29-2023 | 4 | 2023 |
| 23026269100 | 2396485 | EMER-RETIRE 4' OF 2"PAMP MAIN | 03-29-2023 | | 2023 |
| 23026269200 | 2394770 | PM-DE LINE ILI PH2 BEND 260 AB | 06-23-2023 | | 2023 |
| 23026269300 | 2394770 | PM-DE LINE ILI PH2 DENT 36 ABD | 06-05-2023 | | 2023 |
| 23026269400 | 2394770 | PM-DE LINE ILI PH2 DENT2,STPL3 | 05-31-2023 | | 2023 |
| 23026269500 | 2396545 | EMER - INSTALL 4'-2" PIP | 08-26-2023 | 4 | 2023 |
| 23026269600 | 2396545 | EMER - RETIRE 5'-2" PIP | 08-25-2023 | | 2023 |
| 23026270300 | 2396648 | EMER - INSTALL 2'-4" PMMP | 05-25-2023 | 2 | 2023 |
| 23026270400 | 2396648 | EMER - RETIRE 110'-4" P-MP | 05-25-2023 | | 2023 |
| 23026271000 | 2396743 | INSTALL 70'-2" PMMP | 04-10-2023 | 70 | 2023 |
| 23026271100 | 2396743 | ABANDON 60'-2" PMMP | 04-10-2023 | | 2023 |
| 23026271400 | 2396809 | EMER - INSTALL ~5'-2" PMMP | 05-09-2023 | 1 | 2023 |
| 23026271500 | 2396809 | EMER - RETIRE ~5'-2" PMMP | 05-09-2023 | | 2023 |
| 23026272300 | 2397141 | EMER-INSTALL 3" NC POLY VALVE | 04-28-2023 | 4 | 2023 |
| 23026272400 | 2397141 | EMER-RETIRE 3"PV C16-87 | 04-28-2023 | | 2023 |
| 23026272700 | 2397220 | EMER - INSTALL 5'-2" PMMP | 04-25-2023 | 3 | 2023 |
| 23026272800 | 2397220 | EMER - RETIRE 5'-2" PMMP | 04-25-2023 | | 2023 |
| 23026273000 | 2397262 | INSTALL 20'-4"PMMP W/NEW VALVE | 06-26-2023 | 20 | 2023 |
| 23026273100 | 2397262 | RETIRE 20'-4"PMMP W/C19-314 | 06-26-2023 | | 2023 |
| 23026273200 | 2397341 | EMER-RETIRE 741'-1" PMP | 05-24-2023 | | 2023 |
| 23026273300 | 2397369 | INSTALL 290' OF 4" PMMP | 06-30-2023 | 337 | 2023 |
| 23026273400 | 2397369 | RETIRE 283' OF 3" BSMP | 06-30-2023 | | 2023 |
| 23026273500 | 2397374 | EMER-INSTALL 65' OF 2"PMIP | 04-21-2023 | 87 | 2023 |
| 23026273600 | 2397374 | EMER-RETIRE 55' OF 2"PAIP | 04-21-2023 | | 2023 |
| 23026273700 | 2397428 | INSTALL 6' OF 2"PMMP MAIN | 07-12-2024 | 3 | 2024 |

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|-------------|---------|--------------------------------|------------|-----|------|
| 23026273800 | 2397428 | RETIRE 2" POLY VALVE C9-113 | 07-12-2024 | | 2024 |
| 23026274600 | 2397533 | EMER - INSTALL 5'-2" PMIP | 05-11-2023 | 3 | 2023 |
| 23026274700 | 2397533 | EMER - INSTALL 5'-2" PM | 05-11-2023 | | 2023 |
| 23026274900 | 2397641 | EMER - INSTALL 4'-2" PMMP | 05-24-2023 | 4 | 2023 |
| 23026275000 | 2397641 | EMER - RETIRE 4'-2" PMMP | 05-24-2023 | | 2023 |
| 23026275100 | 2397698 | RETIRE 276'-3" BSLP | 05-23-2023 | | 2023 |
| 23026275200 | 2397746 | EMER - INSTALL 3'-2" PMIP | 06-14-2023 | 3 | 2023 |
| 23026275300 | 2397746 | EMER - RETIRE 3'-2" PIP | 06-14-2023 | | 2023 |
| 23026276300 | 2397850 | EMER-INSTALL 2"POLY VALVE | 06-27-2023 | 4 | 2023 |
| 23026276400 | 2397850 | EMER-RETIRE 2"VALVE C14-27 | 06-27-2023 | | 2023 |
| 23026276500 | 2072743 | EMER - ABANDON 5'-4"CSLP | 08-04-2023 | | 2023 |
| 23026276900 | 2397915 | RETIRE 250' OF 3"BSLP MAIN | 06-27-2023 | | 2023 |
| 23026277000 | 2397942 | EMER-INSTALL 15' OF 8"PMLP MN | 08-10-2023 | 11 | 2023 |
| 23026277100 | 2397942 | EMER-RETIRE 15' OF 8"BSLP MN | 08-10-2023 | | 2023 |
| 23026277200 | 2397951 | EMER-RETIRE 55' OF 6"PMLP MN | 06-14-2023 | | 2023 |
| 23026277300 | 2397784 | INSTALL 265' OF 6"PMMP MAIN | 08-31-2023 | 258 | 2023 |
| 23026277400 | 2397784 | RETIRE 285' OF 6"PMMP MAIN | 08-31-2023 | | 2023 |
| 23026277600 | 2397978 | INSTALL 595'-2"PMMP | 11-10-2023 | 704 | 2023 |
| 23026277700 | 2397978 | RETIRE 2881'-12" BSMP | 11-10-2023 | | 2023 |
| 23026277900 | 2397985 | EMER - INSTALL 69'-6" PMLP | 06-08-2023 | 75 | 2023 |
| 23026278000 | 2397985 | EMER - RETIRE 69'-6" BSLP | 06-08-2023 | | 2023 |
| 23026278200 | 2398026 | EMER-INSTALL 185' OF 4"PMLP | 06-16-2023 | 184 | 2023 |
| 23026278300 | 2398026 | EMER-RETIRE 181' OF 4"BSLP MN | 06-16-2023 | | 2023 |
| 23026278500 | 2398063 | EMER - INSTALL 3'-2" PMMP | 07-06-2023 | 3 | 2023 |
| 23026278600 | 2398063 | EMER - RETIRE 3'-2" PMMP | 07-06-2023 | | 2023 |
| 23026279500 | 2398273 | INSTALL 339'-8" PMLP | 05-10-2024 | | 2024 |
| 23026279600 | 2398273 | RETIRE 339'-8" BSLP | 05-10-2024 | | 2024 |
| 23026279900 | 2293505 | RETIRE 38'-3" PMP | 06-26-2023 | | 2023 |
| 23026280100 | 2288144 | RETIRE 10' OF 10"CSMP MAIN | 09-07-2023 | | 2023 |
| 23026280200 | 2178949 | RETIRE 18570'-2"-16" S&PMP | 04-22-2024 | | 2024 |
| 23026280300 | 2178949 | RETIRE 1107'-2"&8" CS&PHHP | 04-17-2024 | | 2024 |
| 23026280800 | 2398452 | EMER-INSTALL 62' OF 4"PMLP | 07-12-2023 | 62 | 2023 |
| 23026280900 | 2398452 | EMER-RETIRE 62' OF 4"BSLP | 07-12-2023 | | 2023 |
| 23026281200 | 2398470 | EMER-INSTALL 2' OF 2"PMMP MAIN | 06-26-2023 | 2 | 2023 |
| 23026281300 | 2398470 | EMER-RETIRE 2' OF 2"PMMP MAIN | 06-26-2023 | | 2023 |
| 23026281600 | 2398499 | EMER-INSTALL 3'-3" PMMP | 07-17-2023 | 3 | 2023 |
| 23026281700 | 2398499 | EMER-RETIRE 3'-3" PMAP | 07-17-2023 | | 2023 |
| 23026282000 | 2398519 | INSTALL 40'-4" PMIP | 07-18-2023 | 60 | 2023 |
| 23026282100 | 2398519 | RETIRE 36'-4" BSIP | 07-18-2023 | | 2023 |
| 23026282600 | 2398622 | EMER - RETIRE 216'-2" PAMP | 07-14-2023 | | 2023 |
| 23026282700 | 2398628 | EMER-ABANDON 333' OF 2"PAMP | 07-06-2023 | | 2023 |
| 23026282800 | 2398629 | EMER - INSTALL 5'-2" PMMP | 07-05-2023 | | 2023 |
| 23026282900 | 2398629 | EMER - ABANDON 5'-2" PMMP | 07-05-2023 | | 2023 |

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| 23026283200 | 2398638 | INSTALL 480' OF 2"PMMP MAIN | 08-17-2023 | 503 | 2023 |
| 23026283300 | 2398638 | RETIRE 400' OF 2"BSMP MAIN | 08-17-2023 | | 2023 |
| 23026283400 | 2398662 | EMER - INSTALL 5'-3" PMMP | 07-24-2023 | 5 | 2023 |
| 23026283500 | 2398662 | EMER - RETIRE 5'-3" PMP | 07-24-2023 | | 2023 |
| 23026283600 | 2289651 | INSTALL LP FITTINGS | 10-28-2024 | | 2024 |
| 23026284000 | 2398759 | EMER-INSTALL 2' OF 3"PMMP MAIN | 07-26-2023 | 2 | 2023 |
| 23026284100 | 2398759 | EMER-RETIRE 2' OF 3"PAMP MAIN | 07-26-2023 | | 2023 |
| 23026284300 | 2398803 | EMER-INSTALL 490' OF 2"PMMP | 08-10-2023 | 493 | 2023 |
| 23026284400 | 2398803 | EMER-RETIRE 520' OF 4"BSMP MN | 08-10-2023 | | 2023 |
| 23026284500 | 2398833 | INSTALL 80'4" PMLP | 07-27-2023 | 60 | 2023 |
| 23026284600 | 2398833 | RETIRE 80'-4" BSLP | 07-27-2023 | | 2023 |
| 23026284800 | 2398947 | EMER - INSTALL 40'-4" PMLP | 07-25-2023 | 34 | 2023 |
| 23026284900 | 2398947 | EMER - RETIRE 40'-4" BSLP | 07-25-2023 | | 2023 |
| 23026285300 | | EMER - RETIRE 159'-3"BSLP | 07-27-2023 | | 2023 |
| 23026285400 | 1530969 | RETIRE 300' OF 2"PIP MAIN | 02-01-2024 | | 2024 |
| 23026285800 | 2399065 | EMER-INSTALL 3' OF 2"PMMP MAIN | 07-25-2023 | 3 | 2023 |
| 23026285900 | 2399065 | EMER-RETIRE 3' OF 2"PMMP MAIN | 07-25-2023 | | 2023 |
| 23026286000 | 2399105 | EMER - INSTALL 6'-2" PMMP | 08-21-2023 | 6 | 2023 |
| 23026286100 | 2399105 | EMER - RETIRE 6'-2" PMMP | 08-21-2023 | | 2023 |
| 23026286300 | 2399149 | RETIRE 306' OF 3"BSLP MAIN | 09-05-2023 | | 2023 |
| 23026287300 | 2398923 | INSTALL 121'-4" CSMP | 09-20-2024 | 20 | 2024 |
| 23026287400 | 2398923 | RETIRE 98'-4" CSMP | 09-20-2024 | | 2024 |
| 23026287600 | 2399333 | INSTALL 30'-4" PMMP | 06-20-2024 | 4 | 2024 |
| 23026287700 | 2399333 | RETIRE ~30'-4" PMP | 06-20-2024 | | 2024 |
| 23026287800 | 2399336 | INSTALL 500'-4" PMMP | 10-23-2023 | 1,079 | 2023 |
| 23026287900 | 2399336 | RETIRE 500'-3" PMP | 10-23-2023 | | 2023 |
| 23026288000 | 2399340 | EMER - INSTALL 5'-2" PMMP | 08-10-2023 | 5 | 2023 |
| 23026288100 | 2399340 | EMER - RETIRE 5'-2" PMMP | 08-10-2023 | | 2023 |
| 23026288500 | 2399394 | EMER - INSTALL 3'-2" PMMP | 08-21-2023 | 8 | 2023 |
| 23026288600 | 2399394 | EMER - RETIRE 3'-2" PMP | 08-21-2023 | | 2023 |
| 23026289300 | 2075305 | INSTALL 7'-2"&6" PMLP | 08-28-2023 | 6 | 2023 |
| 23026289700 | 2399730 | INSTALL 70' OF 3"PMLP MAIN | 03-05-2024 | | 2024 |
| 23026289800 | 2399730 | RETIRE 271' OF 2"/3"BSLP MAIN | 03-05-2024 | | 2024 |
| 23026289900 | 2399734 | EMER-INSTALL 8'-3" PMMP | 09-01-2023 | 8 | 2023 |
| 23026290000 | 2399734 | EMER-RETIRE 8'-3" PAMP | 09-01-2023 | | 2023 |
| 23026290100 | 2399764 | EMER - 3'-3" PMIP | 09-20-2023 | 3 | 2023 |
| 23026290200 | 2399764 | EMER-RETIRE 3'-PIP | 09-20-2023 | | 2023 |
| 23026290800 | 2399859 | INSERT/INSTALL 160'-3"PMLP MN | 10-20-2023 | 173 | 2023 |
| 23026290900 | 2399859 | RETIRE 60' OF 3"BSLP MAIN | 10-20-2023 | | 2023 |
| 23026291200 | 2399884 | EMER - INSTALL 8'-3" PMIP | 09-08-2023 | 9 | 2023 |
| 23026291300 | 2399884 | EMER - RETIRE 7'3" BS&P | 09-08-2023 | | 2023 |
| 23026291400 | 2179094 | PAPER JOB - MP RETIREMENT | 06-27-2023 | | 2023 |
| 23026291700 | 2399908 | EMER - INSTALL 3'-4" PMIP | 09-08-2023 | 3 | 2023 |

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| 23026291800 | 2399908 | EMER - RETIRE 3'-4" PIP | 09-08-2023 | | 2023 |
| 23026292300 | 2399973 | INSTALL 2" SS | 01-16-2024 | | 2024 |
| 23026292400 | 2399973 | RETIRE 154'-2" CSIP | 02-26-2024 | | 2024 |
| 23026292501 | 1968251 | INSTALL 800' OF 2-4" PMMP | 10-06-2023 | 794 | 2023 |
| 23026293700 | 2395080 | INSTALL 74'-2" PMMP | 02-21-2024 | 51 | 2024 |
| 23026293800 | 2395080 | RETIRE 88'-2"&4" PMMP | 02-21-2024 | | 2024 |
| 23026293900 | 2300046 | EMER-INSTALL 3' OF 2"PMMP MAIN | 09-18-2023 | 3 | 2023 |
| 23026294000 | 2300046 | EMER-RETIRE 3' OF 2"PMMP MAIN | 09-18-2023 | | 2023 |
| 23026294500 | 2300176 | RETIRE 338' OF 4"BSLP MAIN | 12-14-2023 | | 2023 |
| 23026294600 | 2292756 | ABANDON ~790'-2" PMMP | 10-04-2023 | | 2023 |
| 23026296200 | 1963805 | INSTALL 1429'-6" PMMP | 06-28-2024 | 1,779 | 2024 |
| 23026296300 | 1963805 | RETIRE 1479'-6" CS&PMMP | 06-27-2024 | | 2024 |
| 23026296400 | 2300379 | INSTALL 110' OF 2"PMMP MAIN | 12-21-2023 | 164 | 2023 |
| 23026296500 | 2300379 | RETIRE 88' OF 2"CSMP MAIN | 12-21-2023 | | 2023 |
| 23026296800 | 2300514 | EMER - INSTALL 40'-4" PMMP | 10-31-2023 | 90 | 2023 |
| 23026296900 | 2300514 | EMER - RETIRE 40'-4" CSMP | 10-31-2023 | | 2023 |
| 23026297000 | 2286853 | INSTALL PCF'S LP | 09-14-2023 | | 2023 |
| 23026297200 | 2300544 | EMER - INSTALL 13'-2" PMMP | 10-12-2023 | 23 | 2023 |
| 23026297300 | 2300544 | EMER - RETIRE 2'-2" PMP | 10-12-2023 | | 2023 |
| 23026300401 | 2302060 | INSTALL 1150' 4/2" PMMP | 05-16-2024 | 1,139 | 2024 |
| 23026300500 | 2302060 | RETIRE 3896' 4/3/2" PAMP | 04-24-2024 | | 2024 |
| 23026300600 | 2300593 | INSTALL 180'-4" PMLP | 01-12-2024 | 207 | 2024 |
| 23026300700 | 2300593 | RETIRE 150'-4" PMLP | 01-12-2024 | | 2024 |
| 23026300800 | 2300982 | EMER-INSTALL 5' OF 3"PMLP | 10-10-2023 | 5 | 2023 |
| 23026300900 | 2300982 | EMER-RETIRE 5' OF 3"PLP MAIN | 10-10-2023 | | 2023 |
| 23026301000 | 2301003 | EMER-INSTALL 2' OF 4"PMMP MAIN | 05-31-2023 | 2 | 2023 |
| 23026301100 | 2301003 | EMER-RETIRE 2' OF 4"PAMP MAIN | 05-31-2023 | | 2023 |
| 23026302800 | 2301220 | EMER - INSTALL 2'-3" PMP | 10-30-2023 | 2 | 2023 |
| 23026302900 | 2301220 | EMER - RETIRE 2'-3" PMP | 10-30-2023 | | 2023 |
| 23026303000 | 2301235 | EMER - RETIRE 13'-3" BSLP | 10-19-2023 | | 2023 |
| 23026303400 | 2182441 | INSTALL 20'-2" CSHP | 08-12-2024 | 33 | 2024 |
| 23026303700 | 2301286 | EMER - INSTALL 5' OF 2" PMMP | 11-03-2023 | 3 | 2023 |
| 23026303800 | 2301286 | EMER - RETIRE 3' OF 2" PAMP | 11-03-2023 | | 2023 |
| 23026303900 | 2301300 | EMER-INSTALL 3'-2" PMMP MAIN | 10-23-2023 | 3 | 2023 |
| 23026304000 | 2301300 | EMER-RETIRE 3'-2"PAMP MAIN | 10-23-2023 | | 2023 |
| 23026304100 | 2301315 | RETIRE 667' OF 2"PMMP MAIN | 11-29-2023 | | 2023 |
| 23026305300 | 2301713 | EMER-INSTALL 11'-2" PMMP | 11-13-2023 | 11 | 2023 |
| 23026305400 | 2301713 | EMER-RETIRE 11'-2" PMMP | 11-13-2023 | | 2023 |
| 23026306000 | 2301940 | EMER-INSTALL 2'-3" PMMP | 12-04-2023 | 2 | 2023 |
| 23026306100 | 2301940 | EMER-RETIRE 2'-3" PMMP | 12-04-2023 | | 2023 |
| 23026307400 | 2302214 | EMER-INSTALL 3' OF 2"PMMP | 12-05-2023 | 3 | 2023 |
| 23026307500 | 2302214 | EMER-RETIRE 3' OF 2"PMP MAIN | 12-05-2023 | | 2023 |
| 23026307700 | 2302251 | EMER - INSTALL 5'-2" PMMP | 12-08-2023 | 5 | 2023 |

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| 23026307800 | 2302251 | EMER - RETIRE 5'-2" PMP | 12-08-2023 | | 2023 |
| 23026307900 | 2302264 | EMER-INSTALL 10'-4"PMMP/VALVE | 12-18-2023 | 10 | 2023 |
| 23026308000 | 2302264 | EMER-RETIRE 10'-4"PMP/C8-150 | 12-18-2023 | | 2023 |
| 23026308900 | 2302491 | EMER INSTALL 4' OF 3" PMMP | 12-22-2023 | 4 | 2023 |
| 23026309000 | 2302491 | EMER RETIRE 4' OF 3" PMP | 12-22-2023 | | 2023 |
| 23026309100 | 2302494 | EMER-INSTALL 4'OF 2"PMMP MAIN | 01-03-2024 | 4 | 2024 |
| 23026309200 | 2302494 | EMER-RETIRE 4' OF 3"PMP MAIN | 01-03-2024 | | 2024 |
| 23026309300 | 2302539 | EMER - INSTALL 5'-4" PMMP | 03-06-2024 | 6 | 2024 |
| 23026309400 | 2302539 | EMER - RETIRE 5'-4" PMP | 03-06-2024 | | 2024 |
| 24026310000 | 2402717 | EMER-INSTALL 4' OF 2"PMIP MAIN | 01-04-2024 | 4 | 2024 |
| 24026310100 | 2402717 | EMER-RETIRE 4' OF 2"PAIP MAIN | 01-08-2024 | | 2024 |
| 24026310400 | 2402788 | INSTALL VALVE & 5' OF 2" PMMP | 02-07-2024 | | 2024 |
| 24026310500 | 2402788 | RETIRE VALVE & 5' OF 2" PMP | 02-07-2024 | | 2024 |
| 24026310600 | 2402791 | INSTALL 2, 2" STOPPLE FITTINGS | 06-17-2024 | | 2024 |
| 24026310700 | 2402791 | ABANDON ~ 150'- 2" CSIP | 06-17-2024 | | 2024 |
| 24026311500 | 2402881 | EMER-RETIRE 350' OF 4"PMP MAIN | 01-10-2024 | | 2024 |
| 24026311800 | 2402917 | EMER-INSTALL 5' OF 2"PMMP MAIN | 02-20-2024 | 4 | 2024 |
| 24026311900 | 2402917 | EMER-RETIRE 5' OF 2"PAMP MAIN | 02-20-2024 | | 2024 |
| 24026312700 | 2301315 | RETIRE 310' OF 2"PMMP MAIN | 06-20-2024 | | 2024 |
| 24026314000 | 2403330 | EMER-INSTALL 5' OF 4"PMMP MAIN | 02-20-2024 | 5 | 2024 |
| 24026314100 | 2403330 | EMER-RETIRE 5' OF 4"PAMP MAIN | 02-20-2024 | | 2024 |
| 24026314600 | 2403381 | EMER-INSTALL 170' OF 2"/4"PMMP | 02-05-2024 | 161 | 2024 |
| 24026314700 | 2403381 | EMER-RETIRE 120'- 8"BSMP MAIN | 02-05-2024 | | 2024 |
| 24026316000 | 2403473 | EMER - INSTALL 2'-3" PMLP | 02-13-2024 | 2 | 2024 |
| 24026316100 | 2403473 | EMER - RETIRE 2'-3" PALP | 02-13-2024 | | 2024 |
| 24026316500 | 2403545 | EMER - INSTALL 15'-2" PMMP | 02-07-2024 | 10 | 2024 |
| 24026316600 | 2403545 | EMER - ABANDON ~15'-2" PMMP | 02-07-2024 | | 2024 |
| 24026317800 | 2403650 | EMER - INSTALL 5'-2" PMIP | 02-16-2024 | 7 | 2024 |
| 24026317900 | 2403650 | EMER - RETIRE 5'-2" PIP | 02-12-2024 | | 2024 |
| 24026318600 | 2403677 | EMER - INSTALL 11' OF 2" PMMP | 02-21-2024 | 11 | 2024 |
| 24026318700 | 2403677 | EMER - RETIRE 11' OF 2" PMP | 02-21-2024 | | 2024 |
| 24026320800 | 2403719 | EMER - INSTALL 5'-3" PMIP | 02-22-2024 | 4 | 2024 |
| 24026320900 | 2403719 | EMER RETIRE 5'-3" PIP | 02-26-2024 | | 2024 |
| 24026321000 | 2183195 | PAPER-RETIRE ~250-3" PLP | 03-14-2024 | | 2024 |
| 24026328300 | 2403957 | EMER - INSTALL 26'-6" PMLP | 02-28-2024 | 26 | 2024 |
| 24026328400 | 2403957 | EMER - RETIRE 26'-6" BSLP | 02-28-2024 | | 2024 |
| 24026329400 | 2403993 | EMER - INSTALL 2'-3" PMLP | 03-01-2024 | 2 | 2024 |
| 24026329500 | 2403993 | EMER - RETIRE 2'-3" PALP | 03-01-2024 | | 2024 |
| 24026329700 | 2404044 | EMER - 2'-2" PMMP | 03-14-2024 | 2 | 2024 |
| 24026329800 | 2404044 | EMER - RETIRE 2'-2" PMP | 03-14-2024 | | 2024 |
| 24026330300 | 2404124 | EMER - INSTALL 5'- 2" PMMP | 04-02-2024 | 6 | 2024 |
| 24026330400 | 2404124 | EMER-RETIRE 5'-2"PMMP | 04-02-2024 | | 2024 |
| 24026331100 | 2404137 | EMER - INSTALL ~5'-2" PMMP | 02-29-2024 | | 2024 |

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|-------------|---------|--------------------------------|------------|-----|------|
| 24026331200 | 2404137 | ABANDON ~5'-2" PMMP | 02-29-2024 | | 2024 |
| 24026331601 | 2404300 | INSTALL 475' OF 2"PMMP MAIN | 07-22-2024 | 439 | 2024 |
| 24026331700 | 2404300 | REITRE 435' OF 2"BSLP MAIN | 07-22-2024 | | 2024 |
| 24026331900 | 2404366 | EMER - INSTALL 1' OF 2"PMMP | 04-02-2024 | 1 | 2024 |
| 24026332000 | 2404366 | EMER - RETIRE 1' OF 2"PAMP | 04-02-2024 | | 2024 |
| 24026332100 | 2404382 | INSERT 50' OF 3" PMLP | 05-29-2024 | 50 | 2024 |
| 24026332200 | 2404382 | RETIRE 52' - 4" CSLP | 08-28-2024 | | 2024 |
| 24026332600 | 2404438 | EMER INSTALL 10'-6" PMMP | 03-15-2024 | 10 | 2024 |
| 24026332700 | 2404438 | EMER - RETIRE 15'- PMMP | 03-15-2024 | | 2024 |
| 24026332800 | 2404460 | EMER - INSTALL 5'-4" PMIP | 03-16-2024 | | 2024 |
| 24026332900 | 2404460 | EMER - ABANDON 5'-4" PMIP | 03-14-2024 | | 2024 |
| 24026333000 | 2404461 | EMER-INSTALL 18'-4"PMLP MAIN | 04-30-2024 | 18 | 2024 |
| 24026333100 | 2404461 | EMER-RETIRE 18'-4"BSLP MAIN | 04-30-2024 | | 2024 |
| 24026334000 | 2404516 | INSTALL 5' OF 2" PMMP | 04-02-2024 | 5 | 2024 |
| 24026334200 | 2404516 | RETIRE 5' OF 2" PMP | 04-02-2024 | | 2024 |
| 24026335100 | 2404593 | EMER - INSTALL 4'-3" PMMP | 03-27-2024 | 4 | 2024 |
| 24026335200 | 2404593 | EMER - 4' - 3" PMMP | 03-27-2024 | | 2024 |
| 24026335400 | 2404602 | EMER - INSTALL 2'-2" PMMP | 03-28-2024 | 2 | 2024 |
| 24026335500 | 2404602 | EMER - RETIRE - 2'-2" PMMP | 03-28-2024 | | 2024 |
| 24026336800 | 2404682 | EMER - INSTALL 5' OF 2" PMMP | 03-27-2024 | 5 | 2024 |
| 24026336900 | 2404682 | EMER - RETIRE 5' - 2" PMMP | 03-27-2024 | | 2024 |
| 24026337600 | 2404846 | INSTALL 30'-2" PMMP | 05-23-2024 | 27 | 2024 |
| 24026337700 | 2404846 | RETIRE 20'-2" PMMP | 05-23-2024 | | 2024 |
| 24026337800 | 1968534 | INSTALL 8" SS | 04-08-2024 | | 2024 |
| 24026338000 | 2404974 | INSTALL 65'-2"&4" PMMP | 05-30-2024 | 72 | 2024 |
| 24026338100 | 2404974 | RETIRE 42'-2"&4" CSMP | 05-30-2024 | | 2024 |
| 24026338200 | 2404991 | EMER - INSTALL 5'-3" PMMP | 03-29-2024 | | 2024 |
| 24026338300 | 2404991 | EMER - ABANDON 5'-3" PMMP | 03-29-2024 | | 2024 |
| 24026339400 | 2405251 | RETIRE 322'-4" CSLP | 06-17-2024 | | 2024 |
| 24026339800 | 2405285 | INSTALL 35' OF 6"PMLP MAIN | 08-06-2024 | 56 | 2024 |
| 24026339900 | 2405285 | RETIRE 25' OF 6"BSLP MAIN | 08-06-2024 | | 2024 |
| 24026340600 | 2286985 | INSTALL LP FITTINGS | 04-25-2024 | | 2024 |
| 24026340800 | 2405445 | EMER - INSTALL 15'-2" PMMP | 11-21-2024 | | 2024 |
| 24026340900 | 2405445 | EMER - ABANDON 15'-2" PMP | 11-21-2024 | | 2024 |
| 24026342000 | 2405691 | EMER - INSTALL 2' OF 2"PMMP | 05-14-2024 | 2 | 2024 |
| 24026342100 | 2405691 | EMER - RETIRE 2' OF 2"PMP MAIN | 05-14-2024 | | 2024 |
| 24026342300 | 2405815 | EMER - RETIRE 267'-2" PMP | 05-16-2024 | | 2024 |
| 24026342400 | 2405849 | INSTALL ~585'-2" PMMP | 07-30-2024 | 793 | 2024 |
| 24026342500 | 2405849 | RETIRE ~600'-2" PMMP | 07-30-2024 | | 2024 |
| 24026342600 | 2405851 | EMER ABANDON 200' OF 2" BSIP | 05-20-2024 | | 2024 |
| 24026343300 | 2406051 | INSTALL 4" POLY VALVE | 06-06-2024 | | 2024 |
| 24026343400 | 2406051 | RETIRE 4"POLY VALVE C19-270 | 10-31-2024 | | 2024 |
| 24026343500 | 2406067 | INSTALL 25'-8" PMLP | 06-10-2024 | 24 | 2024 |

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|-------------|---------|--------------------------------|------------|-----|------|
| 24026343600 | 2406067 | RETIRE 15'-8" CSLP | 06-17-2024 | | 2024 |
| 24026343700 | 2406069 | EMER - INSTALL 3'-3" PMMP | 05-31-2024 | 3 | 2024 |
| 24026343800 | 2406069 | EMER - RETIRE 3'-3" PMP | 05-31-2024 | | 2024 |
| 24026344300 | 2406121 | EMER-INSTALL 6' OF 4" PMIP | 05-28-2024 | 6 | 2024 |
| 24026344400 | 2406121 | EMER-RETIRE 6' OF 4" PAIP | 05-28-2024 | | 2024 |
| 24026344900 | 2399932 | ABANDON ~30'-2" PMP | 06-07-2024 | | 2024 |
| 24026345300 | 2406290 | RETIRE 350' OF 4"CSLP MAIN | 07-31-2024 | | 2024 |
| 24026346300 | 2406391 | EMER-INSTALL 3' OF 2"PMMP MAIN | 07-05-2024 | 3 | 2024 |
| 24026346400 | 2406391 | EMER-RETIRE 3' OF 2"PMMP MAIN | 07-05-2024 | | 2024 |
| 24026346600 | 2406415 | EMER-INSTALL 8' OF 4"PMLP | 08-29-2024 | 8 | 2024 |
| 24026346700 | 2406415 | EMER-RETIRE 8' OF 4"PMLP | 08-29-2024 | | 2024 |
| 24026347300 | 2406473 | EMER - INSTALL 12'-3" PMIP | 06-17-2024 | 12 | 2024 |
| 24026347400 | 2406473 | EMER - RETIRE 12'-3" PIP | 06-17-2024 | | 2024 |
| 24026347600 | 2406504 | EMER - INSTALL 7'-2" PMIP | 06-10-2024 | 7 | 2024 |
| 24026347700 | 2406504 | EMER -RETIRE 7'-2" PMIP | 06-10-2024 | | 2024 |
| 24026348000 | 2406530 | EMER-INSTALL 4' OF 3"PMMP MAIN | 07-08-2024 | 4 | 2024 |
| 24026348100 | 2406530 | EMER-RETIRE 4' OF 3"PMMP MAIN | 07-08-2024 | | 2024 |
| 24026348700 | 2406685 | EMER - INSTALL 5' OF 2" PMMP | 06-26-2024 | 5 | 2024 |
| 24026348800 | 2406685 | EMER-LEAK RETIRE C14-37 | 06-26-2024 | | 2024 |
| 24026348900 | 2406689 | INSTALL 70'-8" PMMP | 10-07-2024 | 119 | 2024 |
| 24026349000 | 2406689 | RETIRE 70' OF 10"CSMP MAIN | 10-07-2024 | | 2024 |
| 24026349300 | 2406339 | INSTALL 4"POLY VALVE KY-C1556 | 10-02-2024 | 4 | 2024 |
| 24026349400 | 2406339 | RETIRE 10' OF 3"PMP MAIN | 10-02-2024 | | 2024 |
| 24026349700 | 2406867 | EMER INSTALL 2' OF 2" PMMP | 07-03-2024 | 2 | 2024 |
| 24026349800 | 2406867 | EMER ABANDON 2' OF 2" PAMP | 07-03-2024 | | 2024 |
| 24026349900 | 2406889 | EMER - INSTALL 3'-2" PMMP | 07-10-2024 | 3 | 2024 |
| 24026350000 | 2406889 | EMER - RETIRE 3'-2" PMP | 07-10-2024 | | 2024 |
| 24026350500 | 2406959 | EMER-INSTALL 2"VALVE KY-C1586 | 07-01-2024 | 5 | 2024 |
| 24026350600 | 2406959 | EMER-RETIRE C15-66 POLY VALVE | 07-01-2024 | | 2024 |
| 24026350800 | 2286912 | PAPER ONLY MP RETIREMENT | 05-22-2024 | | 2024 |
| 24026350900 | 2286363 | RETIRE 38'-2" CSMP | 04-10-2024 | | 2024 |
| 24026351400 | 2407044 | EMER - INSTALL 2'-2" PMMP | 07-31-2024 | 2 | 2024 |
| 24026351500 | 2407044 | EMER - RETIRE 2'-2" PMP | 07-31-2024 | | 2024 |
| 24026351600 | 2407065 | EMER - INSTALL 2'-2" PMMP | 07-30-2024 | 2 | 2024 |
| 24026351700 | 2407065 | EMER - RETIRE 2'-2" PMP | 07-30-2024 | | 2024 |
| 24026351800 | 2407081 | EMER-INSTALL 8' OF 3" PMMP | 07-26-2024 | 8 | 2024 |
| 24026351900 | 2407081 | EMER-RETIRE 8' OF 3" PMP | 07-26-2024 | | 2024 |
| 24026352600 | 2407141 | EMER - INSTALL 2'-2" PMMP | 08-06-2024 | 3 | 2024 |
| 24026352700 | 2407141 | EMER - RETIRE 2'-2" PMMP | 08-06-2024 | | 2024 |
| 24026352800 | 2407169 | INSTALL SS FITTING | 08-01-2024 | | 2024 |
| 24026352900 | 2407169 | RETIRE 4'-3"&4"CSMP | 08-01-2024 | | 2024 |
| 24026353200 | 2407193 | EMER - INSTALL 3'-4" PMMP | 08-01-2024 | 3 | 2024 |
| 24026353300 | 2407193 | EMER - RETIRE 3'-4" PAMP | 08-01-2024 | | 2024 |

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|-------------|---------|--------------------------------|------------|-----|------|
| 24026353800 | 2407257 | INSTALL 180' OF 4"PMMP MAIN | 08-30-2024 | 201 | 2024 |
| 24026353900 | 2407257 | RETIRE 164' OF 4"CSMP MAIN | 09-04-2024 | | 2024 |
| 24026354100 | 2407275 | EMER - RETIRE 308'-2" PLP | 07-25-2024 | | 2024 |
| 24026354900 | 2286912 | PAPER ONLY-LP STOPPLE FITTINGS | 08-02-2024 | | 2024 |
| 24026355100 | 2407627 | EMER - RETIRE 12'-2" PMMP | 08-30-2024 | | 2024 |
| 24026355400 | 2407662 | EMER-INSTALL 2' OF 2"PMMP MAIN | 08-28-2024 | 2 | 2024 |
| 24026355500 | 2407662 | EMER-RETIRE 2' OF 2"PAMP MAIN | 08-28-2024 | | 2024 |
| 24026356200 | 2407712 | INSTALL NEW 4" CRITICAL VALVE | 09-20-2024 | 2 | 2024 |
| 24026356300 | 2407712 | RETIRE 4" POLY VALVE C16-184 | 09-20-2024 | | 2024 |
| 24026356500 | 2407759 | EMER - INSTALL 2'-2" PMIP | 09-04-2024 | 2 | 2024 |
| 24026356600 | 2407759 | EMER - RETIRE 2'-2" PIP | 09-04-2024 | | 2024 |
| 24026357000 | 2407867 | EMER-INSTALL 50' OF 4"PMLP | 09-10-2024 | 50 | 2024 |
| 24026357100 | 2407867 | EMER-RETIRE 50' OF 4"BSLP MAIN | 09-10-2024 | | 2024 |
| 24026357400 | 2407133 | INSTALL 275'-3" CSMP | 10-24-2024 | 292 | 2024 |
| 24026357500 | 2407133 | RETIRE 265'-3" CSMP | 10-24-2024 | | 2024 |
| 24026357600 | 2407902 | RETIRE 490' OF 2"/4"PMP MAIN | 08-28-2024 | | 2024 |
| 24026357700 | 2407916 | EMER-INSTALL 2' OF 3"PMMP MAIN | 08-23-2024 | 2 | 2024 |
| 24026357800 | 2407916 | EMER-RETIRE 3" POLY VLV C-145 | 08-23-2024 | | 2024 |
| 24026360200 | 2408530 | EMER-INSTALL 3' OF 2"PMMP MAIN | 09-04-2024 | | 2024 |
| 24026360300 | 2408530 | EMER-RETIRE 3' OF 2"PAMP MAIN | 09-04-2024 | | 2024 |
| 24026360500 | 2395080 | INSTALL 18'-2" PMMP | 10-29-2024 | | 2024 |
| 24026360600 | 2395080 | RETIRE 10'-2" PMMP | 10-29-2024 | | 2024 |
| 24026361500 | 2408727 | EMER - INSTALL 2'-3" PMLP | 09-27-2024 | 2 | 2024 |
| 24026361600 | 2408727 | EMER - RETIRE 2'-3" PALP | 09-27-2024 | | 2024 |
| 24026362000 | 2408757 | EMER-INSTALL 3' OF 3"PMMP MAIN | 09-17-2024 | | 2024 |
| 24026362100 | 2408757 | EMER-RETIRE 2' OF 3"PMP/VALVE | 09-17-2024 | | 2024 |
| 24026362300 | 2182441 | INSTALL 2" SS | 08-12-2024 | | 2024 |
| 24026363400 | 2291708 | PAPER ONLY MP RETIREMENT | 09-23-2024 | | 2024 |
| 24026363600 | 2409175 | INSTALL 620' OF 4"PMMP MAIN | 11-19-2024 | 685 | 2024 |
| 24026363700 | 2409175 | RETIRE 580' OF 4"BSMP MAIN | 11-19-2024 | | 2024 |
| 24026365000 | 2409284 | EMER-INSTALL 10' - 2" PMMP | 10-30-2024 | 0 | 2024 |
| 24026365100 | 2409284 | EMER-RETIRE 10' - 2" PMMP | 10-30-2024 | | 2024 |

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 20, 2024

8. Describe the process Columbia Kentucky undertakes to determine the SMRP budget.

RESPONSE:

Columbia's SMRP budget follows the Company's capital budgeting process, which was recently described in the Direct Testimony of Chrisley Scott in Columbia's pending rate case, Case No. 2024-00092:

"Columbia's capital planning process is integral to its overall success. In order to ensure the effectiveness of this process, the capital program oversight team, which I lead, serves as the primary administrator for the capital budget. This team facilitates consistent capital planning and allocation across NiSource, optimizes capital spending, monitors and forecasts capital expenditure, and communicates capital information to key internal departments and stakeholders.

The capital budgeting and planning process for NiSource is a continual management process. Columbia's utility capital planning process is a series of collaborative working sessions with the President, other members of the Columbia leadership team, as well as the Finance, Operations, Engineering & Planning Departments. The Columbia leadership team along with Operations, Engineering & Planning are primarily responsible for identifying the capital investment needs for public safety and reliability, compliance requirements, customer service levels, and for identifying capital plan recommendations, which are reviewed with the NiSource Financial Planning Department. The output of these collaborative working sessions is a draft multi-year capital investment plan.

As part of the annual budgeting process, Columbia's formal request for capital is presented to NiSource executive management. Executive management finalizes the capital budget for the next fiscal year and submits it for NiSource Board of Directors for approval. The approval of the annual NiSource capital program constitutes approval of the allocation to Columbia's capital budget."¹

¹ Case No. 2024-00092, *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*, Prepared Direct Testimony of Chrisley Scott (May 16, 2024) at 5-6.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 20, 2024

9. Discuss whether Columbia Kentucky has considered increasing the SMRP budget in order to complete the pipeline replacement in compliance with 49 C.F.R. § 192.455.

RESPONSE:

Columbia does not interpret 49 C.F.R. 192.455 as mandating a specific timeline for pipeline replacement. Columbia's SMRP was promulgated under Kentucky law, specifically KRS 278.509, which permits the Commission to "allow recovery of costs for investment in natural gas pipeline replacement programs which are not recovered in the existing rates of a regulated utility."¹ This statute does not mandate a timeline for pipeline replacement programs. The timeline for replacement is at the discretion of the utility applicant.

As explained in Columbia's Response to Commission Staff's First Request for Information, No. 8, the SMRP budget is established according to the capital budgeting process, and fluctuates each year. In recent years, the cost of inflation and the cost of

¹ KRS 278.509

labor have significantly impacted SMRP program costs. Columbia continues to weigh the value of priority pipe projects against other system risks along with the impact of the expenditures on the cost to customers.²

² Please refer to the Case No. 2024-00092, *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*, Direct Testimony of Dave Roy (May 16, 2024) at 10.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED NOVEMBER 20, 2024

10. Confirm that, if Columbia Kentucky increases the number of SMRP projects, Columbia Kentucky believes it will recover the expenses in this rider. If confirmed, explain why Columbia Kentucky has not completed construction as proposed each year.

RESPONSE:

Columbia believes the replacement of eligible facilities authorized in its original Accelerated Main Replacement Program, which was expanded and renamed the Safety Modification and Replacement Program, will all be recovered through the rider. As outlined in Columbia's Response to Staff's Request for Information No. 8, Columbia does not budget for SMRP expenses based upon specific projects. Projects are designed to fit a budget that is estimated and submitted to the Commission in Columbia's annual October SMRP filing, forecasting work for the next calendar year. Columbia tries to meet this estimate when designing projects for the next calendar year's work. Columbia also takes into consideration factors such as resource availability, safety considerations, state and local government construction and paving plans. The completion of projects in the Project List proposed by Columbia each year is not specifically tied to the likelihood of

recovery through the SMRP rider. There can be a number of factors that impact the ability to complete construction. These include, but are not limited to, weather, permitting, restoration requirements, and the availability of resources (which includes labor, materials, supplies, and capital). Understanding these dynamics, Columbia may make minor adjustments in the planned work during the course of the year as it strives to adhere to the budget and pursue the replacement of all eligible facilities in the SMRP.