



Indiana Utilities Corporation
123 West Chestnut Street
Corydon, IN 47112

June 17 2011
Indiana Utilities Corp
812-738-3235

RECEIVED

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PUBLIC SERVICE
COMMISSION

Executive director Jeff Derouen

This letter is to request a special permit to the ruling 807 Kar 5:022 gas safety and service, section 17 operations, subsection 17 odorization of gas. Indiana Utilities Corporation is a natural gas company that serves approximately 3,100 customers in Harrison County Indiana. Our purchase point is on Stone Street Road; in Louisville we operate one line that consists of four miles of 4" steel and about one mile of 8". The five miles of pipe in Louisville serves *no customers in Kentucky*. The reason for this letter is to request approval of a special permit from the commission to change from a weekly odorization testing to a monthly test. The rule states: Subsection 17 (g): *Each utility shall conduct sampling of combustible gases to assure proper concentration of odorant in accordance with this section unless otherwise approved by the commission.*

4. Separately odorized systems with more than ten (10) customers shall be sampled for proper odorant level at least once each week.

Our system contains 137 miles of mains, with just 5 miles of pipe in Kentucky but *serves no customers in Kentucky*. This pipeline is walked each calendar year not exceeding 15 months with a Heath Tech Detecto-Pak 3 and investigated if there are any signs of a leak. Along the five mile stretch we have 20 cathodic protection spots that we check annually or bi-annually.

Federal DOT rule 192.625 (f): *To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable...*

Because periodic is somewhat unclear in definition, Indiana Utilities operations and maintenance manual makes this word more clear by stating,
Odorization equipment and odorant levels shall be checked monthly using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable to determine:

Each month our company performs a sniff test with a Heath Tech Odorator. We would like to get the special permit to allow us to only be required to take odorant level readings once monthly. The benefit of being exempt from this rule of weekly odorant testing as opposed to monthly odorant testing is the amount of time that is saved. Indiana Utilities believes that allowing us to take monthly odorant level reading will not cause a problem for the residents along the right-of-way of our pipeline. Our pipeline is in good condition with coating intact. The cathodic protection on our pipeline in Louisville on average is around -1.5 volts. For these reasons we believe that allowing us to take monthly odorant level readings should be acceptable.

Indiana Utilities Corporation

Corey Thatcher
812-26-6936

Enclosures:

2010 odorant level report (at office and pipeline end)
Annual odorization report
Annual or Bi-annual cathodic protection locations and readings

INDIANA UTILITIES CORPORATION

ODORANT LEVEL REPORT

LOCATION INDIANA UTILITIES SHOP 1/2 way in system
 NO. _____

DATE	INTENSITY			ODOROMETER READING	REMARKS	TECHNICIAN
	MILD	AVERAGE	STRONG			
1-11-10			✓	.40		KK
2-2-10			✓	.65		KK
3-2-10			✓	.60		KK
4-7-10	✓			1.00		KK
4-8-10			✓	.60		KK
5-3-10	✓			.95		KK
6-7-10		✓		.75		KK
7-6-10	✓			-1.15		KK
7-16-10			✓	.70		KK
8-2-10			✓	.70		KK
9-1-10		✓		.85		KK
10-4-10			✓	.50		KK
11-1-10			✓	.70		KK
12-1-10			✓	.35	NOT ACCURATE ODORATOR REPAIRED	KK

INDIANA UTILITIES CORPORATION

ANNUAL ODORIZATION REPORT

DATE: 1-6-11, For Period 1-1-10 to 12-31-10

ODORIZER LOCATION: STONE STREET STATION

TYPE ODORIZER: KING TOOL 2-B TANK CAPACITY 40 LB.

BRAND NAME OF ODORANT USED CHEVRON-PHILLIPS, TYPE SCENTINAL S-20

A. Odorant Usage

- 1. Odorant in Tank First of Period 19.0
- 2. Odorant Added During Period 149.8
- 3. Total Odorant to Account For (Items 1 + 2) 168.8
- 4. Odorant in Tank End of Period 29.2
- 5. Odorant Used During Period (Items 3-4) 139.6
- 6. Gas Delivery This Period 14.727 MMCF
- 7. Rate of Odorization in Lbs. or Gal/MMCF:

$$\frac{\text{Odorant Used in Lbs/Gal}}{\text{Gas Delivery in MMCF}} = \frac{(\text{Item 5})}{(\text{Item 6})} = \frac{139.6}{14.727} \text{ Lbs. or Gal/MMCF}$$

227 ~~Lbs.~~ or ~~Gal~~/MMCF
LBSV

B. Odorant Reserve at End of Period

- 8. Odorant on Hand (Including _____ Rec'd This Period)
- 9. Odorant in Odorizer Tank _____
- 10. Odorant in Reserve End of Period (Items 8 & 9) _____

C. Remarks:

Employee Kevin Kenney

President [Signature]

- 1. MMCF = Million Cubic Feet.
- 2. Consult odorant suppliers manual for weight per gallon. Specify Gravity, etc.
- 3. Dilute odorants are measured in gallons - odorization rate in gal/MMCF. Concentrated odorants are measured in pounds - odor rate in lbs/MMCF.

INDIANA UTILITIES CORPORATION
ANNUAL CATHODIC PROTECTION SURVEY REPORT

TEST STATION #	LOCATION	P/S POTENTIAL IN VOLTS					
		DATE ^{3/4/08}	DATE ^{12/1/08}	DATE ^{2/16/09}	DATE ^{12/2/09}	DATE ³⁻²⁻¹⁰	DATE
1	4" Stonestreet Station	-1.60	-1.49	-1.24	-1.50	-1.57	
2	8" Stonestreet & Valleystation	-1.55	-1.43	-2.6/-1.75	-1.6/-1.51	-5.2/-1.54	
3	4" Tamm CT	-1.50	-1.44	-1.28	-1.44	-1.48	
4	4" Valleystation Rd. @ 4713	-1.50	-1.47	-1.29	-1.51	-1.51	
5	4" Valleystation Rd @ 4915	-1.55	-1.54	-1.40	-1.50	-1.48	
5 a	Valley Farms Entrance	-1.60	-1.48	-1.30	-1.50	-1.47	
6	8" Railroad crossing (Eastside)	-1.30	-1.29	-1.25	-1.40	-1.41	
7	8" Casing @ Railroad (Eastside)	-.50	-.83	-.29	-.67	-.70	
8	8" Valleystation & Dixie Hwy.	-1.65	-1.52	-1.41	-1.30	-1.53	
9	4" Donerail @ 9925	-1.65	-1.62	-1.48	-1.60	-1.53	
10	4" PIAUDIT @ 9524	-1.60	-1.65	-1.47	-1.59	-1.52	
11	4" Johnstontown Rd. @ 6315	-1.70	-1.70	-1.57	-1.64	-1.56	
12	4" Cochise @ 9502	-1.90	-1.82	-1.81	-1.82	-1.70	
13	4" Shoshine @ 9508	-1.70	-1.65	-1.60	-1.80	-1.55	
14	8" Greenbelt East	-1.65	-1.55	-1.53	-1.56	-1.54	
15	4" Lower River Rd. @ (Nugent Sand)	-1.80	-1.77	-1.64	-1.73	-1.64	
16	4" Railroad Crossing (Nugent Sand)	-1.80	-1.79	-1.73	-1.77	-1.67	
17	4" Railroad Casing	-.65	-.52	-.40	-.61	-.54	
18	4" OHIO RIVER CROSSING KY SIDE	-1.95	-2.00	-1.85	-2.10	-1.74	
19	4" OHIO RIVER CROSSING KY SIDE		-.55	-.50	-.57	N/A	
20							
21	6" P.E. Floyd County Line	-1.15	-1.22	-1.16	-1.15	-1.24	
22	4" P.E. Pavillion	-1.50	-1.34	-.93	-1.47	-1.56	
23	P.E. @ Caesars Hotel	-1.25	-1.13	-1.21	-1.13	-1.26	
24	P.E. @ Parking Garage	-1.25	-1.20	-1.25	-1.23	-1.34	

Kentucky Cathodic Protection Readings