

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF COLUMBIA GAS OF)
KENTUCKY, INC. FOR: 1) A DECLARATION THAT)
CONSTRUCTION OF A LOW PRESSURE SYSTEM)
SAFETY IMPROVEMENT IS AN EXTENSION OF ITS)
SYSTEM IN THE ORDINARY COURSE OF)
BUSINESS; 2) IN THE ALTERNATIVE, FOR THE)
ISSUANCE OF A PUBLIC CONVENIENCE AND)
NECESSITY FOR SUCH CONSTRUCTION; 3))
APPROVAL OF AN AMENDMENT AND EXPANSION)
OF ITS ACCELERATED MAIN REPLACEMENT)
TARIFF TO ITS SAFETY MODIFICATION AND)
REPLACEMENT TARIFF; AND 4) APPROVAL TO)
MODIFY THE 2019 AMRP CONSTRUCTION PLAN)

CASE NO.
2019-00257

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before August 30, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Columbia Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Columbia Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Columbia Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the application, paragraph 1. Provide a copy of all the information collected by Columbia Kentucky that was used in formulating a design and threat assessment. Also, provide a copy of the assessment created by Columbia Kentucky that resulted in the initiation of the low-pressure gas distribution system safety enhancement program (LP Program).

2. Refer to the application, paragraphs 2 and 3. Confirm that projects included in Columbia Kentucky's Accelerated Main Replacement Program (AMRP) have historically not required a Certificate of Public Convenience and Necessity (CPCN). If confirmed, explain whether Columbia Kentucky maintains that a CPCN, or declaration that a CPCN is not required, will still be necessary if its proposal to expand its AMRP Tariff to include the LP Program.

3. Refer to the application, paragraph 3. Provide examples of "other safety and regulatory compliance projects" that Columbia Kentucky may request to include in the proposed Safety Modification and Replacement Program Tariff (Tariff SMRP) in the future.

4. Refer to the application, paragraph 11.

a. Provide a copy of Columbia Kentucky's Safety Management System (SMS).

b. To the extent that it differs from Columbia Kentucky's SMS, provide a copy of the American Petroleum Institute's Recommended Practice 1173 (RP 1173).

c. Clarify the relationship between Columbia Kentucky's SMS and RP 1173.

5. Refer to the application, paragraph 14; and the Direct Testimony of Gary E. Sullivan (Sullivan Testimony) at page 28, lines 18–20. State whether Columbia Kentucky proposes to include the forecasted increase in operations and maintenance expense in the revenue requirement calculation of the proposed Tariff SMRP.

6. Refer to the application, paragraph 14; and Sullivan Direct Testimony, Attachment B. Provide an update of the costs incurred by Columbia Kentucky to date in

connection with the LP Program. Provide the response in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible.

7. Refer to the application, paragraph 21. If the LP Program does not have a material impact on Columbia Kentucky's financial condition, explain why the costs associated with this program should be recovered through the proposed SMRP Tariff.

8. Refer to the application, paragraph 22. Clarify Columbia Kentucky's assertion that a difference exists between an immediate increase in rates and seeking recovery of 2019 expenditures on a lagged basis and future expenditures on a concurrent basis.

9. Refer to the Direct Testimony of David A. Monte, page 7, lines 8–11. Provide a copy of the NiSource SMS Policy and Standard. If NiSource has not yet established the policy, then provide the necessary information upon its completion.

10. Refer to the Sullivan Testimony, page 15, lines 8–16; and Sullivan Direct Testimony, Attachment A. Explain why Work Package II and Work Package IV are not added simultaneously.

11. Refer to the Sullivan Testimony, page 16, lines 5–7. Explain where the monitoring devices added in Work Package IV are located on Columbia Kentucky's system.

12. Refer to the Sullivan Testimony, page 16, lines 8–17.

a. Describe the work that would be performed to implement the potential Phase II.

b. Explain how Phase II would eliminate or supplement the work performed in Phase I.

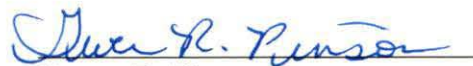
13. Refer to the Sullivan Testimony, page 20, lines 10–12. Explain how the reprioritized projects affected the 2019 AMRP construction plan.

14. Refer to the Sullivan Testimony, page 23, lines 7–11. Explain whether Columbia Kentucky’s current AMRP will upgrade the remaining 369 miles of non-plastic main contained in Columbia Kentucky’s low-pressure systems. If not, provide the number of miles of low-pressure system mains that Columbia Kentucky currently anticipates to be replaced through the AMRP.

15. Refer to the Sullivan Testimony, pages 24–27. Provide a cost-benefit analysis of the options that Columbia Kentucky considered to add over-pressure protection to its low-pressure systems.

16. Refer to the Sullivan Testimony, page 27, lines 3–9. Provide the three practices fulfilled by installing an automatic shut-off regulator.

17. Refer to the Sullivan Testimony, page 27, lines 15–16. Explain how the LP Program will enable Columbia Kentucky to retire some low-pressure stations sooner than would otherwise be the case.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED **AUG 15 2019**

cc: Parties of Record

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