

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2021 SAFETY MODIFICATION	)	CASE NO.
AND REPLACEMENT PROGRAM FILING OF	)	2020-00327
COLUMBIA GAS OF KENTUCKY, INC.	)	

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 an electronic version of the following information. The information requested herein is due on November 23, 2020. The Commission directs Columbia Kentucky to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 Columbia Kentucky obtains information that indicates 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 Columbia Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

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, SMRP Form 2.0, page 1. For the forecasted plant additions, retirements, and removals for 2021, provide the following separately by project:
  - a. Location;
  - b. Number, length, and size of mains and service lines;
  - c. Associated costs;
  - d. Projected construction start date;

- e. Projected month of completion;
- f. Type of material removed; and
- g. Explain in full detail the specific safety issue that each proposed project is addressing.

2. Refer to SMRP Form 2.0, page 1.

- a. Explain why Columbia Kentucky did not use a 13-month average of net plant during the forecasted period to calculate the Safety Modifications and Replacement Program (SMRP) rate base.

- b. Confirm that calculating the SMRP rates based on the ending period plant balances, allows Columbia Kentucky to earn a return on capital expenditures that will not yet have been made. If this cannot be confirmed, explain each basis for the response.

- c. Provide a revised SMRP rate calculation that uses a 13-month average rate base during the forecasted period. Provide an electronic copy in Excel spreadsheet format, with formulas intact and unprotected and all rows and columns accessible, including the calculation of the 13-month average rate base.

3. Refer to SMRP Form 2.0, page 1, and Case No. 2019-00383,<sup>2</sup> SMRP Form 2.0, page 1. Reconcile the 2020 ending plant balances and the 2021 beginning plant balances.

4. Provide an electronic copy of the application schedules in Excel spreadsheet format with all formulas intact and cells unprotected.

5. Refer to the Direct Testimony of David Roy, pages 13–14.

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<sup>2</sup> Case No. 2019-00383, *2020 Safety Modification and Replacement Program Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC Dec. 20, 2019).

a. By account number for the last three years, provide the annual costs associated with direct assessment.

b. Confirm that Columbia Kentucky would no longer incur costs associated with direct assessment if the in-line inspection is utilized. If this cannot be confirmed, explain.

6. Refer to the Direct Testimony of Gary Sullivan, page 14. Provide the estimated annual operating and maintenance expenses associated with in-line inspections. Explain whether Columbia Kentucky proposes to include these expenses in the SMRP.

7. Confirm that adding the in-line inspection retrofit project will not delay the main replacement program.

8. Refer to Case No. 2009-00141,<sup>3</sup> Direct Testimony of David E. Mueller, page 8, and Case No. 2019-00257,<sup>4</sup> Direct Testimony of Gary Sullivan, page 15. Provide a comparison of the original estimate of the projects included in the SMRP with those completed and with those yet to be completed.

9. State whether the expenses involved in Columbia Kentucky's corrective actions in connection with the incidents of customer outages on May 8, 2020, April 16,

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<sup>3</sup> Case No. 2009-00141, *Application of Columbia Gas of Kentucky, Inc. for an Adjustment in Rates* (Ky. PSC Oct. 26, 2009).

<sup>4</sup> Case No. 2019-00257, *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 Certificate of 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* (Ky. PSC Nov. 7, 2019).

2020, and June 4, 2020,<sup>5</sup> were included in the SMRP and provide an itemized list of those expenses.

10. Provide the results of the testing performed on the automatic shut-off valves (ASV) in the March 8, 2020 and April 16, 2020 outages.

11. Provide a list of all outages involving ASVs since Columbia Kentucky began Phase I of the LP Program, include the expense of resolving each outage.

12. State whether the expenses in item 11 were included in the SMRP.

13. Provide a detailed list of all redesigns, upgrades, or reconfigurations Columbia Kentucky has identified as necessary in conjunction with the installation of ASVs, but has not yet completed.

14. State whether the expense associated with Item 13 will be included in the SMRP.



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Lindsey L. Flora  
Deputy Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED NOV 10 2020

cc: Parties of Record

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<sup>5</sup> *Pipeline Safety Branch Customer Outage Report*, an outage involving 132 customers in Harrison County, Ky. (filed Mar. 8, 2020); *Pipeline Safety Branch Customer Outage Report*, an outage involving 222 customers in Greenup County, Ky. (filed Apr. 16, 2020); *Pipeline Safety Branch Customer Outage Report*, an outage involving 25 customers in Bourbon County, Ky. (filed June 4, 2020).

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