

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF COLUMBIA)	
GAS OF KENTUCKY, INC. FOR ITS ANNUAL)	CASE NO.
SAFETY MODIFICATION AND REPLACEMENT)	2024-00328
PROGRAM FILING)	

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, shall file with the Commission an electronic version of the following information. The information requested is due on December 6, 2024. The Commission directs Columbia Kentucky to the Commission's July 22, 2021, Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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, 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.

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

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.
4. Explain what factors went into Columbia Kentucky's choice of projects for the 2025 planning period.
 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.
 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.
 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.
 8. Describe the process Columbia Kentucky undertakes to determine the SMRP budget.

² Case No. 2024-00092, *Electronic Application of Columbia Gas of Kentucky, Inc. for an Adjustment of Rates; Approval of Depreciation Study; Approval of Tariff Revisions; and Other Relief* (filed May 23, 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.

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.



Linda C. Bridwell, PE
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Public Service Commission
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DATED NOV 20 2024

cc: Parties of Record

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