

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ANNUAL PIPELINE	)	CASE NO.
REPLACEMENT PROGRAM FILING OF APACHE	)	2024-00167
GAS TRANSMISSION COMPANY, INC.	)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO APACHE GAS TRANSMISSION CO., INC.

Apache Gas Transmission Co., Inc. (Apache), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on February 17, 2025. The Commission directs Apache to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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.

Apache shall make timely amendment to any prior response if Apache 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 Apache fails or refuses to furnish all or part of the requested information, Apache 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, Apache 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 Annual Pipeline Replacement Plan (PRP) Report document titled "Annual\_PRP\_filing\_-\_240531\_-\_Final.pdf", page 1. State whether Apache or Burkesville holds title, i.e., is the account owner, of the PRP escrow account.

2. Provide documentation detailing the current PRP rates being charged to customers.

3. Provide an updated tariff sheet for the proposed PRP rates.

4. Refer to the Application filed in Case No. 2019-00032,<sup>2</sup> PDF page 3 of 5, where Apache asserted that it "...believes it has four additional water crossings that will need to be replaced in the near future."<sup>3</sup> Provide the name and location of each of the referenced four additional water crossings.

5. State whether Apache ever replaced any or all the four additional water crossings that were similar to Marrowbone Creek.

a. If so, identify the water crossings that were replaced, include a description of when each replacement project began and ended.

b. For any of the four additional water crossings that were not replaced, provide the status of the replacement project of each water crossings.

6. Refer to Apache's Application filed in Case No. 2017-00168,<sup>4</sup> wherein Apache stated, "[t]he two remaining sections that are in need of repair, as noted in the 2014 Inspection Report, are the Cliff Norris Section and the Doug Lewis Section B."<sup>5</sup>

a. Confirm whether Apache has fully completed the "Cliff Norris Section" and "Doug Lewis Section B" repairs.

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<sup>2</sup> Case No. 2019-00032, *Application of Apache Gas Transmission Company, Inc., Annual Pipeline Replacement Program Filing to Approve New Pipeline Replacement Surcharge Rates Beginning with May 1, 2019 Billing Cycle* (filed Jan. 18, 2019), Application.

<sup>3</sup> Case No. 2019-00032, Application at unnumbered PDF page 3.

<sup>4</sup> Case No. 2017-00168, *Application of Apache Gas Transmission Company, Inc. for a Certificate of Public Convenience and Necessity Authorizing the Implementation of a Pipeline Replacement Program, Approval of Financing Pursuant to KRS 278.300 and Application of Apache Gas Transmission Company, Inc. and Burkesville Gas Company, Inc. for Approval of a Gas Pipeline Replacement Surcharge and Tariff* (filed Apr. 14, 2017), Application.


<sup>5</sup> Case No. 2017-00168, Application at 4.

b. If Apache has not fully repaired the “Cliff Norris Section” and “Doug Lewis Section B” section, provide the repair status for each and Apache’s current plan of action to fully complete repairs.

7. Refer to Apache’s Application filed in Case No. 2017-00168, wherein Apache stated, “Apache Gas is also proposing to repair the Allen Creek Road Drainage Ditch Section as a part of this PRP.”<sup>6</sup>

a. Confirm whether Apache has fully repaired the “Allen Creek Road Drainage Ditch” section.

b. If Apache has not fully repaired the “Allen Creek Road Drainage Ditch” section, provide the current repair status for it and Apache’s current plan of action to fully complete repairs.

  
Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED     JAN 28 2025    

cc: Parties of Record

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<sup>6</sup> Case No. 2017-00168, Application at 4.

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