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October 25, 2021

VIA ELECTRONIC MAIL AND HAND DELIVERY

Luly E. Massaro, Commission Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Re: Petition of PPL Corporation, PPL Rhode Island Holdings, LLC, National Grid USA, and The Narragansett Electric Company for Authority to Transfer Ownership of The Narragansett Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals; Docket No. D-21-09

Dear Ms. Massaro:

Enclosed please find an original and four copies of PPL Corporation (“PPL”) and PPL Rhode Island Holdings, LLC’s (“PPL RI”) Responses and Objections to Acadia Center’s First Set of Data Requests, issued on October 1, 2021 (“Acadia’s First Set of Data Requests”).

This filing includes PPL and PPL RI’s partial responses to Acadia’s First Set of Data Requests, specifically 1-15, 1-16, 1-20 and 1-25. On October 22, 2021, the Acadia Center agreed to an extension until October 26, 2021 for PPL and PPL RI to complete their responses to Acadia’s First Set of Data Requests. PPL and PPL RI will provide responses to the remaining requests on a rolling basis as they are complete.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Ramos".

Adam M. Ramos

Enclosures

cc: Service List D-21-09 (via e-mail only)

Docket No. D-21-09 PPL Corp., PPL RI Holdings, LLC, National Grid USA and The Narragansett Electric Co. (collectively, Applicants) – Petition to Transfer Ownership and Related Approvals

Service List Updated 8/18/2021

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October 26, 2021

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This filing includes PPL and PPL RI’s partial responses to Acadia’s First Set of Data Requests, specifically 1-1 through 1-14, 1-17 through 1-19, 1-21 through 1-24 and 1-26. On October 22, 2021, Acadia agreed to an extension until October 26, 2021 for PPL and PPL RI to complete their responses to Acadia’s First Set of Data Requests. This completes PPL and PPL RI’s responses to Acadia’s First Set of Data Requests.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions.

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Acadia 1-1

Request:

According to the 2021 Energy Efficiency Plan filed in Docket 5076, National Grid hosts the Energy Efficiency Technical Working Group on a monthly basis as a forum for in-depth discussion of energy efficiency topics and engages the TWG throughout the planning process to leverage their expertise and seek their feedback.” Will PPL commit to continuing to host this collaborative effort to develop future energy efficiency plans? Please provide any plans for ongoing EE plan development that have been created by PPL and Narragansett.

Response:

PPL and PPL RI plan to continue The Narragansett Electric Company's (“Narragansett”) existing programs for energy efficiency on Day 1 including hosting the Energy Efficiency Technical Working Group on a monthly basis. PPL and PPL RI will evaluate Narragansett's programs for energy efficiency after the Transaction closes to consider opportunities to determine whether any program changes are appropriate. PPL and PPL RI will follow the existing statutory and regulatory requirements and processes to the extent that they determine that they want to make any potential changes to existing energy efficiency programs.

PPL and PPL RI also refer to their responses to data requests OER 1-1, OER 1-3, OER 1-10, and OER 1-18.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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Docket No. D-21-09

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Acadia 1-2

Request:

In any jurisdiction, does PPL currently work to slow or fight heating electrification efforts and/or contribute to any group or coalition actively working to slow or fight heating electrification? If so, what levels of funding or support does PPL expend internally or provide externally to slow or fight heating electrification policy? Does PPL plan to pursue such efforts in its Rhode Island business?

Response:

PPL does not currently or have any plans to work to slow or fight heating electrification efforts and/or contribute to any group or coalition actively working to slow or fight heating electrification in any jurisdiction.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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Acadia 1-3

Request:

Does PPL have a framework for non-pipe alternative strategies, such as energy efficiency, demand response, and heating electrification? Please include any information related to strategies that serve to delay or avoid gas infrastructure construction and expansion.

Response:

PPL and PPL RI refer to their responses to data requests OER 1-7 and OER 1-8. PPL does not currently have any defined non-pipe alternative programs. PPL RI's planned approach will be to follow the National Grid System Reliability Procurement ("SRP") plan, guidelines, and criteria as outlined in the Rhode Island Public Utilities Commission filing in Docket No. 5080 for the 2021-2023 SRP Three-Year Plan.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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Docket No. D-21-09

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Acadia 1-4

Request:

What level of investment in gas distribution expansion has PPL made in other jurisdictions in recent years?

Response:

PPL and PPL RI refer to their responses to data requests Division 3-21 and Division 7-9.

Acadia 1-5

Request:

In any current utility operations, does PPL have any experience or future plans involving the use of the gas distribution network to deliver other gaseous fuels, including but not limited to hydrogen? Are there any plans to use the gas distribution network in Rhode Island in this manner?

Response:

PPL currently does not have any experience or future plans involving the use of gas distribution networks to deliver other gaseous fuels, including but not limited to hydrogen. PPL and PPL RI also currently do not have any plans to use the gas distribution network in Rhode Island in this manner.

As explained in PPL and PPL RI's response to data request AG 1-33, PPL and PPL RI are committed to operating Narragansett's natural gas distribution business consistent with the requirements of Rhode Island's 2021 Act on Climate and all other State policies and requirements addressing global climate change. Any plans to use the Rhode Island gas distribution system to deliver low-carbon fuels like hydrogen will be governmental policy decisions. PPL and PPL RI will work with the Rhode Island governor, legislature, regulators, and stakeholders to achieve Rhode Island energy policy priorities related to gas distribution. PPL's long-term plan for its operation of Narragansett's gas distribution business is to do so responsibly and consistent with the Rhode Island's short- and long-term renewable energy and climate goals.

Acadia 1-6

Request:

Does PPL actively market gas conversions in other jurisdictions? Will it plan to market gas conversions in Rhode Island? If so, what source of funds will PPL use to market and/or incentivize gas conversions?

Response:

PPL Electric Utilities Corporation's ("PPL Electric") approved Phase IV Act 129 Energy Efficiency and Conservation Plan ("Act 129 Plan") has a budget for gas conversions for 75 residential homes. PPL Electric's Act 129 Plan can be viewed at <https://www.puc.pa.gov/pcdocs/1705055.pdf>.

Louisville Gas & Electric and Kentucky Utilities do not market gas conversions in their Kentucky markets.

PPL and PPL RI do not have any plans, nor have they considered funding sources, to market gas conversions in Rhode Island.

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Acadia 1-7

Request:

What experience, if any, does PPL have with development and operation of geothermal heating districts? Does PPL have any research or plans associated with geothermal district potential in Rhode Island? If so, please provide this information.

Response:

PPL does not have any experience with geothermal heating districts, and PPL does not have any research or plans associated with geothermal district potential in Rhode Island.

Acadia 1-8

Request:

Does PPL track methane leakage from its gas distribution system in other jurisdictions? If so, what rate of methane leakage does the Company experience in those jurisdictions? Does PPL have a strategy for tracking and combatting methane leakage in Rhode Island?

Response:

PPL reports annually the percentage of unaccounted for gas on the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration ("PHMSA") form F7100.1-1. "Unaccounted for gas" is lost gas; that is, gas that the operator cannot account for as usage or through appropriate adjustments. It is a percentage of the total input for the twelve months ending June 30th of each calendar year. The table below is the PPL data for the years 2010 through 2020. National Grid reports unaccounted for gas loss annually to PHMSA for Narragansett. PPL will continue to do so for Narragansett after the Transaction closes. The leak prone pipe program in Rhode Island is intended to reduce the number of system leaks on bare steel, cast iron and wrought iron piping.

Year	Unaccounted for Gas (%)
2020	1.14
2019	1.81
2018	1.43
2017	1.72
2016	1.42
2015	2.06
2014	1.93
2013	1.99
2012	1.55
2011	2.14
2010	2.15

Acadia 1-9

Request:

In the last 10 years, has PPL been fined or found liable for any safety violations related to its gas distribution business? Please provide any relevant documents.

Response:

PPL and PPL RI object to this request is overly broad and unduly burdensome in its request that PPL and PPL RI identify whether it has "been fined or found liable for any safety violations related to its gas distribution business" and its request that PPL and PPL RI provide "any relevant documents." Additionally PPL and PPL RI object to this request to the extent that it seeks privileged and confidential attorney-client communications and attorney work product as part of its request for "any relevant documents."

Subject to and without waiving these objections, PPL and PPL RI have conducted a reasonable search for responsive information and documents and respond to this data request as follows:

In 2012, Louisville Gas & Electric Company ("LG&E") agreed, by virtue of a Settlement Agreement with Kentucky Public Service Commission Staff, to pay a \$125,000 fine related to a gas incident that originated in the garage of a customer's residence. Fire investigators determined that a high-pressure leak in a water line cut a hole in LG&E's gas line, thereby allowing gas to escape. The Kentucky Public Service Commission ("KPSC") did not find, or even allege, that LG&E's actions caused the leak in the water line. Rather, the KPSC cited LG&E with alleged violations of its Gas Emergency Operating Procedures and its Operations, Maintenance and Inspection Manual in connection with responding to the incident. By entering into the Settlement Agreement, LG&E did not admit any liability relating to the incident. The Settlement Agreement included LG&E's proactive adoption of several remedial measures to its policies and procedures. See Attachment PPL-Acadia 1-9-1 for a copy of the KPSC Final Order, entered February 5, 2012, approving the Settlement Agreement and dismissing the case.

Beginning in July 2018, the KPSC assumed enforcement of Kentucky's Underground Facility Protection Statute, commonly known as a "call-before-you-dig law," as it pertains to natural gas and hazardous liquid pipelines. That law requires individuals to report their intention to excavate prior to performing the work by calling "811," or reporting it online. It also requires utility companies to mark where their facilities are located so excavators can avoid damaging the facilities when digging. Kentucky's law provides utility companies 48 hours to perform these locating procedures. Prior to 2017, most local utilities in Louisville used the same contractor to perform those duties. Due to the high volume of locate requests, the contractor was not consistently meeting that 48-hour requirement. In 2017, LG&E engaged a new contractor who took over

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LG&E's locate duties starting in 2018, but, due to hiring and training issues, coupled with a large increase in locate requests due to various fiber provider projects, that contractor also had difficulty meeting the 48-hour requirement. LG&E then determined that splitting the work between multiple contractors would be the best solution to meet anticipated future needs, increase flexibility and reduce risk. To facilitate this process, LG&E implemented a new ticket management software on September 4, 2018 which allows the "811" tickets to be routed to multiple contractors. Since then, the number of late locates has decreased significantly.

In connection with a periodic inspection of LG&E's gas distribution system, conducted in April of 2019, the KPSC fined LG&E \$150,000 associated with the "late locates" for the time period between 2016-2018, in addition to a single occurrence where a low pressure main did not have the required 24 inch cover. See Attachment PPL-Acadia 1-9-2 for a copy of a letter regarding this fine, dated January 15, 2020. LG&E also paid fines to the KPSC associated with violations of the call-before-you-dig law, relating primarily to damage to facilities due to either late locates or "mis-locates" (where the lines were improperly marked due to contractor or equipment error, or recordkeeping errors in terms of where facilities were documented to be located.) LG&E paid those in the following years and amounts: 2018 - \$222,250; 2019 - \$232,000; 2020 - \$192,000; and 2021 YTD - \$80,000. See Attachment PPL-Acadia 1-9-3 for a summary.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LOUISVILLE GAS & ELECTRIC)
)
) CASE NO. 2012-00239
)

)
ALLEGED FAILURE TO COMPLY WITH)
KRS 278.495)

ORDER

By Order dated June 26, 2012, the Commission directed Louisville Gas & Electric ("LG&E") to show cause why it should not be subject to the penalties prescribed in KRS 278.992 for probable violations of KRS 278.495, which grants the Commission authority to regulate the safety of natural gas facilities owned or operated by any public utility.

THE ALLEGED SAFETY VIOLATIONS

The alleged violations cited in the Commission's June 26, 2012 Order are as follows:

1. 49 CFR Part 192.605(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

The Incident Investigation Report ("Report") which was attached to the initial show-cause order issue on June 26, 2012, cited several sections of LG&E's written Gas Emergency Operating Procedures ("GEOP") and its written Operation, Maintenance, and Inspection Manual ("OM&I") procedures related to Maximum

Allowable Operating Pressure ("MAOP"), which LG&E was alleged to have violated during this incident.

The GEOP establishes procedures and guidelines to minimize the hazards resulting from a gas pipeline emergency and the purpose of the OM&I is to ensure that the MAOP of all pipelines owned and operated by LG&E is established and maintained as required by Federal, Kentucky and Indiana regulations. The GEOP and the OM&I provide for the following:

- GEOP Section 1,1.2(e) Actions directed toward protecting the health and safety of human life first and then personal property.
- GEOP Section 1, 1.2(g) Making safe any actual or potential hazard to life or property.
- GEOP Section 1, 1.5, 2(b) The field level personnel are responsible for prevention and mitigation of incidents and (b) says they are to determine the scope of an emergency.
- GEOP Section 1, 1.5,2(c) Evacuating premises which are or which may be affected.
- GEOP Section 1,1.5.2(d) Preventing accidental ignition.
- GEOP Section 1,1.5.2(i) Ventilating affected premises.
- GEOP Section 1,1.5.2(j) Coordinating with fire, police, and other public officials the actions to be taken.
- GEOP Section 4, 4.3, 2(a) The first responder will assess the scene.
- GEOP Section 4,4.3,2(b) The first responder will bar test the service line and any other gas facilities posing a leak migration hazard to the building.

- GEOP Section 4.4.3.2(c) First responder will check cracks, crevices, manholes, and catch basins.
- OM&I MAOP Section 4, 4.3. 4.3.1 The System Regulation and Operations shall be responsible for all operations and maintenance of district regulator stations, ensuring that the set points do not exceed those established as the MAOP of the facilities being served.

The Report alleges that LG&E's actions did not result in protecting the health and safety of human life first, since an LG&E gas trouble technician was on site for approximately 2 1/2 hours before the explosion occurred. The Report alleges indications of the leak should have prompted gas readings inside homes and evacuations and timely calls to public safety officials. The Report also alleges that sewer manholes were not properly checked and vented, nor was bar testing performed.

2. 49 CFR Part 192.751. Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion.

The Report alleges LG&E had adequate time to take steps to protect life and property through the evacuation of homes and the elimination of ignition sources, and that LG&E's response to the emergency was insufficient and did not lead them to identify where the presence of gas constituted a hazard of fire or explosion. The Report also alleges LG&E did not evacuate any homes prior to the explosion and did not eliminate all potential ignition sources.

3. 49 CFR Part 192.619(a). No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure.

As part of the investigation, LG&E submitted pressure records for the MAOP (60 psig) segment of piping that contained multiple readings that exceeded the MAOP. The pressure records submitted indicated no abnormal pressures at the time of the incident; however, they do show that pressures exceeded the MAOP one day prior to the incident, as well as two days after the incident. According to these records provided by LG&E, in the month of December 2011, which was when this incident occurred, the MAOP was exceeded 22 out of 31 days. Records also indicate that pressures exceeded the MAOP numerous days in the months prior to and after the incident.

LG&E's response filed on July 16, 2012 stated that 49 CFR 192.201(a)(2)(i) allows a variance of up to 10 percent above MAOP. The Commission, however, does not accept LG&E's position. 49 CFR 192 Subpart D, which includes sections 192.141 through 192.203, prescribes the requirements for the **design and installation** of pipeline components and facilities. It also prescribes the requirements relating to protection against accidental over pressuring. 49 CFR 192 Subpart L, which includes sections 192.601 through 192.631 prescribes the minimum requirements for the **operation** of pipeline facilities. Subpart D, as well as Subpart L, must be followed in order to comply with the regulation.

4. 49 CFR Part 192.741(c). If there are indications of abnormally high or low pressure, the regulator and the auxiliary equipment must be inspected and the necessary measures employed to correct any unsatisfactory operating conditions.

Pressure records provided by LG&E indicate multiple readings that exceeded the MAOP (60 psig) of the system. The Report alleges that LG&E did not employ any actions to correct any unsatisfactory operating conditions.

PROCEDURAL HISTORY

The violations cited in the Commission's June 26, 2012 Order arose from a December 6, 2011 incident in Jefferson County, Kentucky, wherein a four-inch plastic gas-main leak resulted in a house explosion.

On July 16, 2012, LG&E filed a response to the Commission's June 26, 2012 show-cause Order and requested an informal conference to be held in this matter. The informal conference was held at the Commission's offices on August 24, 2012. The discussions at the informal conference led to agreement on settlement of some issues, but additional information and discussions were needed on other issues.

A follow-up informal conference was held on December 3, 2012. The discussions at this informal conference led to the filing of a Joint Stipulation of Facts and Settlement Agreement (collectively referred to as "Settlement Agreement"). The Settlement Agreement, attached hereto as an Appendix and incorporated herein by reference, sets forth LG&E's agreement with the statement of facts contained in the Report, signed and dated July 18, 2012, except as specifically denied in LG&E's July 16, 2012 response. The Settlement Agreement also discusses the remedial actions taken by LG&E and a civil penalty in the amount of \$125,000.00 that LG&E will pay in full satisfaction of this proceeding.

SETTLEMENT

In determining whether the terms of the Settlement Agreement are in the public interest and are reasonable, the Commission has taken into consideration the comprehensive nature of the Settlement Agreement, LG&E's actions taken after the incident, including:

1. Changing its Operator Qualifications ("OQ") testing from multiple choice answers to open-ended answers in which the employees have to explain their answers;
2. Adding to its OQ testing two trainings per year specifically for leak investigations, each to include hands-on tests;
3. Modifying leak modules in its training yard to include more modules and to give the instructor more flexibility in the number and types of testing for the employees;
4. Providing copies of its emergency operating procedures to every employee and establishing an electronic copy of the emergency operating procedures on all electronic notebooks;
5. Changing procedures that called for periodic mock emergency drills to quarterly unannounced emergency drills;
6. Implementing its "360 degrees of leak-response awareness campaign," which focuses on pinpointing, probing, and perimeter establishment in leak investigations;

7. Conducting a safety meeting which discussed this incident and focused on the points described in the “360 degrees of leak-response awareness campaign;”

8. Conducting two tabletop exercises which used NTSB incidents as the scenarios and focused on how to respond to this type of incident;

9. Changing the decision process as to when 911 emergency services should be contacted in leak-responses;

10. Changes made to its system to address the MAOP issue, which LG&E provided in a summary report to Commission Staff and was filed in the record of this case on January 24, 2013; and

11. LG&E’s cooperation in achieving a resolution of this proceeding.

Based on the evidence of the record and being otherwise sufficiently advised, the Commission finds that the Settlement Agreement is in accordance with the law and does not violate any regulatory principle. The Settlement Agreement is a product of arm’s-length negotiations among capable, knowledgeable parties, is in the public interest, and results in a reasonable resolution of all issues in this case.

IT IS THEREFORE ORDERED that:

1. The Joint Stipulation of Facts and Settlement Agreement is adopted and approved in its entirety as a complete resolution of all issues in this case.

2. LG&E is assessed a penalty of \$250,000.00.

3. LG&E shall pay \$125,000.00 of the \$250,000.00 civil penalty within 30 days of the date of this Order by cashier’s check or money order payable to the Kentucky State Treasurer and mailed or delivered to the Office of General Counsel,

Kentucky Public Service Commission, 211 Sower Boulevard, Post Office Box 615, Frankfort, Kentucky 40602.

4. The remaining \$125,000.00 of the civil penalty is suspended on the condition that LG&E abide by the terms contained in the Settlement Agreement and provide all documentation required within the time allotted in ordering paragraphs 5, 6, 8, and 9 herein.

5. Within 30 days of the date of entry of this Order approving the Settlement Agreement, LG&E shall provide to the Commission the following:

- Records of all leak investigation and emergency-response procedures and situational-awareness training conducted during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment, including:
 - ◆ Records of all leak investigation procedure audits and tests conducted during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment;
 - ◆ Records of all leak investigation and emergency response awareness initiatives implemented during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment; and
 - ◆ Summary documentation of leak investigation and emergency response policy or procedural changes implemented during 2012.

6. LG&E shall continue its corrective action to rectify any systems that exceeded MAOP in December 2012, and ensure that the operating pressure of each of its distribution systems does not exceed MAOP during normal operating conditions. Corrective action(s) shall be performed as expeditiously as possible, with these initial measures to be completed no later than June 30, 2013, and LG&E

shall submit a report of its corrective actions on the first business day of each month beginning with February 1, 2013. LG&E shall have procedures in place to continually monitor the systems operating pressures and adequately address/correct any issues or overpressure conditions discovered. Within 30 days of the completion of all corrective actions, LG&E shall file a final report with the Commission including the systems identified as exceeding MAOP, the corrective action taken and the procedures put into place to monitor the MAOP to ensure the system does not exceed MAOP under normal operating conditions in the future.

7. Within 12 months from the date of this order approving the Settlement Agreement, Commission investigators will perform a MAOP audit on LG&E's system. During this audit, LG&E will provide a summary report of all systems that have exceeded MAOP since the final report filed pursuant to paragraph 5 above. This summary report shall include, at a minimum, the following information: Facility Name, Facility Type, Source, MAOP, Operating Pressure, Units, and the highest pressure recorded each week/seven days. LG&E shall also submit any measures employed and corrective actions implemented to correct any exceedance of MAOP.

8. Within 30 days of the entry of this Order approving the Settlement Agreement, LG&E shall provide Commission Staff with:

- Highlighted documentation of any emergency operations or leak-investigation procedural changes implemented during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment, including:
 - ◆ Enhancements introduced to require quarterly scheduling and execution of unannounced mock leak emergencies and tabletop exercises;

- ◆ Enhancements introduced to enhance emergency-notification procedures which establish that LG&E gas-leak investigators and emergency responders must notify 911 whenever Grade 1 leak levels are detected in sewers or storm drains;
- ◆ Requirements to make available hard or electronic copies of its Gas Emergency Operations Procedures to all gas crews that respond to gas-leak investigations or emergencies;
- Highlighted documentation of any training enhancements or changes implemented during 2012 on leak-investigation and emergency-response procedures;
- Documentation of physical changes made at LG&E's Gas Distribution training yard during 2012 to provide its trainers with increased flexibility to modify leak-investigation testing and training scenarios;
- Documentation of LG&E's controlled distribution of hard copy versions of its Gas Emergency Operations Procedures during 2012 to all crews that respond to gas-leak investigations or emergencies.
- Documentation of LG&E's executed plan to provide electronic versions of its operations, maintenance, inspection, and emergency-response procedures on field crews' mobile devices and/or rugged laptops prior to December 31, 2012. LG&E shall file a notice with the Commission once the electronic versions are provided.

9. Within 30 days of the entry of this Order approving the Settlement Agreement, LG&E will provide Commission Staff its 2013 schedule for: (1) Quarterly Unannounced Drills on Gas Leak Investigations and Emergency Response; and (2) Planned Safety Audit Blitzes which place emphasis on Gas Leak Investigations and Emergency Response Procedures. Commission Staff will be invited to observe the scheduled drills and audit blitzes, and LG&E will be open to all feedback and enhancement recommendations offered by Commission Staff specific to the way

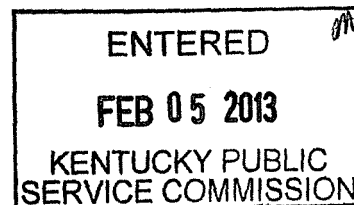
these drills and blitzes are planned, scheduled, and executed. At the drills and blitzes, LG&E will: (1) explain steps taken to ensure employees are not made aware of the date, time or location of drills; (2) describe the procedure used to choose the date, time and location of drills; and (3) provide a list of all personnel who were given advanced knowledge of the drills and blitzes.

11. The hearing scheduled for February 12, 2013 is cancelled.

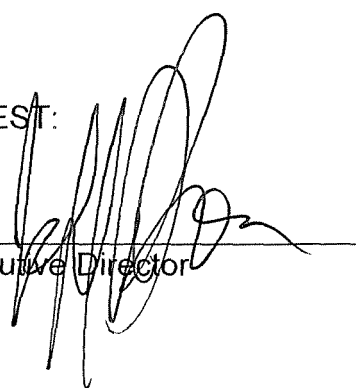
12. Upon payment of the \$125,000.00 civil penalty, this case shall be closed and removed from the Commission's docket without further Order of the Commission.

13. Any documents filed in the future pursuant to ordering paragraphs 5, 6, 8, and 9 herein, shall reference this case number and shall be retained in the utility's general correspondence file.

By the Commission



ATTEST:


Executive Director

Case No. 2012-00239

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2012-00239 FEB 05 2013

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JAN 18 2013
PUBLIC SERVICE
COMMISSION

In the Matter of:

LOUISVILLE GAS AND ELECTRIC)
COMPANY)
_____) CASE NO. 2012-00239
)
ALLEGED FAILURE TO COMPLY)
WITH KRS 278.495)

STIPULATION OF FACTS AND SETTLEMENT AGREEMENT

This agreement is formally known as a Stipulation of Facts and Settlement Agreement ("Settlement Agreement"). The parties to this Settlement Agreement are Louisville Gas and Electric Company ("LG&E") and Staff of the Kentucky Public Service Commission ("Commission Staff"). It is the intent and purpose of the parties hereto to express their agreement on a mutually satisfactory resolution of all of the issues in the proceeding.

It is understood by the parties that this Settlement Agreement is not binding upon the Public Service Commission ("Commission"). The Commission must independently approve and adopt this Settlement Agreement before this matter can be deemed concluded and removed from the Commission's docket. The parties have expended considerable efforts to reach a stipulation as to the facts of this matter, as well as in developing a proposal for settlement. LG&E and Commission Staff agree that this Settlement Agreement, viewed in its entirety, constitutes a reasonable resolution of all issues in this proceeding.

In addition, the adoption of this Settlement Agreement will eliminate the need for the Commission, Commission Staff, and LG&E to expend significant resources in litigating this proceeding and will eliminate the possibility of, and any need for, rehearing or appeals of the Commission's final Order.

FACTS

LG&E and the Commission Staff submit this stipulation of facts for the Commission's consideration in rendering a decision in this proceeding. Commission Staff developed and submitted to the Commission a Utility Incident Report ("Report") which reported Commission Staff findings and recommendations as a result of an investigation of a gas explosion involving LG&E facilities occurring on December 6, 2011. The December 6, 2011 incident occurred in Louisville, Kentucky, when a natural gas leak, ignition and explosion occurred near 5206 River Trail Place in Louisville.

According to the Report, on the day of the explosion, LG&E received a complaint of a gas smell outside the home of 5202 River Trail Place. An LG&E Gas Trouble Technician was dispatched to investigate, and upon arrival, discovered high gas readings coming from three storm drains at the intersection of River Trail Place and Queens Castle Drive. Based upon his initial review, the technician believed the gas smell was the result of an underground main leak only. The technician did not "bar test" at any time to check for migrating gas in order to establish his perimeter. He subsequently arranged for an on-call LG&E construction crew to provide site assistance, and contacted Kentucky 811 for emergency underground utility locates. Shortly after the arrival of the construction crew, an explosion occurred in the garage of 5206 River Trail Place. The occupants of the residence were able to escape the house

without injury. The house at 5206 River Trail Place was destroyed by the explosion and subsequent fire.

SHOW CAUSE ORDER

By a Show Cause Order dated June 26, 2012, the Commission initiated this proceeding to determine whether LG&E should be subject to the penalties prescribed in KRS 278.992 for four alleged violations relating to KRS 278.495 and 807 KAR 5:006, Section 24(1), which address natural gas pipeline safety standards and requirements. The Commission has the authority to enforce such standards and requirements arising under 49 USC § 60101 et seq. and federal regulations promulgated thereto. Based on Commission Staff's investigation, it was alleged that LG&E violated the following gas regulations:

1. 49 CFR Part 192.605(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.
2. 49 CFR Part 192.751. Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion.
3. 49 CFR Part 192.619(a). No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a *maximum allowable operating pressure*.
4. 49 CFR Part 192.741(c). If there are indications of abnormally high or low pressure, the regulator and the auxiliary equipment must be inspected and the necessary measures employed to correct any unsatisfactory operating conditions.¹

¹ June 26, 2012 Order, pp. 3-4.

On July 16, 2012, LG&E filed a response to the Commission's June 26, 2012 Show Cause Order. In its response, LG&E requested an informal conference be held in this matter. Pursuant to that request, an informal conference was scheduled in this matter for August 24, 2012 at the Commission's Frankfort offices. Representatives of LG&E were in attendance, as were Commission Staff.

During the informal conference, representatives of LG&E confirmed that they have taken proactive steps to follow and implement the Commission Staff's recommendations set forth at page 15 of the Report, many of which were started before the Staff's Report was issued. A follow-up IC was scheduled for December 3, 2012 at the Commission's Frankfort offices. Representatives of LG&E were in attendance, as were Commission Staff. Changes to the settlement agreement were discussed. Subsequent conversations and information provided to Commission Staff led to LG&E and Commission Staff reaching the agreement described below.

LG&E has identified each of its distribution systems in which operating pressure exceeded maximum allowable operating pressure (MAOP) at any time during the month of December 2012 and has provided to staff a summary report of this pressure recorder data review.

Based on this information, LG&E began the process of lowering the operating pressure for those systems identified as having exceeded MAOP. As of January 10, 2013 LG&E completed the adjustments on each of the 60 psig distribution systems identified and will begin the same process of lowering the operating pressure on the 50 psig distribution systems. Once that is complete, LG&E will make adjustments to its lower pressure systems.

SETTLEMENT AGREEMENT

As a result of discussions held during the informal conference, LG&E and the Commission Staff submit the following settlement agreement for the Commission's consideration in rendering its decision in this proceeding:

1. LG&E agrees that the Commission Staff's Utility Incident Report of the incident in question accurately describes and sets forth the material facts and circumstances surrounding the December 6, 2011 incident except as specifically disputed or clarified in LG&E's July 16, 2012 Response in this case.
2. In settlement of this proceeding, LG&E agrees for a civil penalty in the amount of TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000) to be assessed. The total maximum fine allowed under the governing statutes is FIVE HUNDRED THOUSAND DOLLARS (\$500,000). LG&E agrees to pay ONE HUNDRED TWENTY-FIVE THOUSAND DOLLARS (\$125,000) of the agreed upon \$250,000 civil penalty within 30 days of the date of entry of the Order approving this Settlement Agreement. The remaining ONE HUNDRED TWENTY-FIVE THOUSAND DOLLARS (\$125,000) is suspended on the condition that LG&E provide all required documentation (as described in paragraphs 4, 5, 7, and 8 below) within the time allotted. LG&E agrees such suspended penalty shall become due and payable if LG&E does not remedy its failure to comply within 30 days after the Commission has issued written notice to LG&E. Once the required information is filed by LG&E, the suspended portion of the penalty shall be eliminated and LG&E will have fulfilled all of its payment obligations under this Settlement Agreement. Any penalty paid as a result of this proceeding will not be recoverable through rates.
3. The scope of this proceeding is limited by the Commission's June 26, 2012 Show Cause Order on whether LG&E should be assessed penalties under KRS 278.992 for alleged violations of natural gas pipeline safety standards and requirements. Neither the payment of the civil penalty, nor any other agreement contained in this Settlement Agreement, shall be construed as an admission by LG&E of any liability arising out of the December 6, 2011 incident. The Commission's acceptance of this Settlement Agreement shall not be construed as a finding of a willful violation of any gas pipeline safety regulation. Finally, neither the Commission nor Commission Staff has made any findings as to whether or not the alleged violations in this matter caused or contributed to the December 6, 2011 explosion.

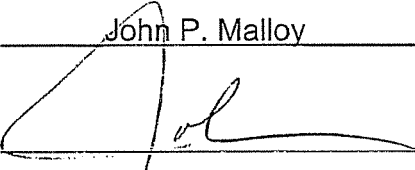
4. Within 30 days of the date of entry of the Order approving this Settlement Agreement, LG&E shall provide to the Commission the following:
 - Records of all leak investigation and emergency response procedures and situational awareness training conducted during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment;
 - Records of all leak investigation procedure audits and tests conducted during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment;
 - Records of all leak investigation and emergency response awareness initiatives implemented during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment; and
 - Summary documentation of leak investigation and emergency response policy or procedural changes implemented during 2012.
5. LG&E shall continue its corrective action to rectify any systems that exceeded MAOP in December 2012 and ensure that the operating pressure of each of its distribution systems does not exceed MAOP during normal operating conditions. Corrective action(s) shall be performed as expeditiously as possible but these initial measures shall be completed no later than June 30, 2013 and LG&E shall submit a report of its corrective actions on the first business day of each month beginning with February 1, 2013. LG&E shall have procedures in place to continually monitor the systems operating pressures and adequately address/correct any issues or overpressure conditions discovered. Within 30 days of the completion of all corrective actions, LG&E shall file a final report with the Commission including the systems identified as exceeding MAOP, the corrective action taken and the procedures put into place to monitor the MAOP to ensure the system does not exceed MAOP under normal operating conditions in the future.
6. Within twelve months from the date of the order approving this Settlement Agreement, Commission investigators will perform an MAOP audit on LG&E's system. During this audit, LG&E will provide a summary report of all systems that have exceeded MAOP since the final report filed pursuant to paragraph 5 above. This summary report shall include, at a minimum, the following information: Facility Name, Facility Type, Source, MAOP, Operating Pressure, Units, and the highest pressure recorded each week/seven days. LG&E shall also submit any measures employed and corrective actions implemented to correct any exceedance of MAOP.

7. Within 30 days of the entry of the Order approving this Settlement Agreement, LG&E shall provide Commission Staff with:
- Highlighted documentation of any emergency operations or leak investigation procedural changes implemented during 2012 which place increased emphasis on leak probing, leak pinpointing, and perimeter establishment, including:
 - Enhancements introduced to require quarterly scheduling and execution of unannounced mock leak emergencies and tabletop exercises;
 - Enhancements introduced to enhance emergency notification procedures, which establish that LG&E gas leak investigators and emergency responders must notify 911 whenever Grade 1 leak levels are detected in sewers or storm drains;
 - Requirements to make available hard or electronic copies of its Gas Emergency Operations Procedures to all gas crews that respond to gas leak investigations or emergencies;
 - Highlighted documentation of any training enhancements or changes implemented during 2012 on leak investigation and emergency response procedures;
 - Documentation of physical changes made at LG&E's Gas Distribution training yard during 2012 to provide its trainers with increased flexibility to modify leak investigation testing and training scenarios;
 - Documentation of LG&E's controlled distribution of hard copy versions of its Gas Emergency Operations Procedures during 2012 to all crews that respond to gas leak investigations or emergencies.
 - Documentation of LG&E's executed plan to provide electronic versions of its operations, maintenance, inspection, and emergency response procedures on field crews' mobile devices and/or rugged laptops prior to December 31, 2012. LG&E shall file a notice with the Commission once the electronic versions are provided.
8. Within 30 days of the entry of the Order approving this Settlement Agreement, LG&E will provide Commission Staff its 2013 schedule for: 1) Quarterly Unannounced Drills on Gas Leak Investigations and Emergency Response; and 2) Planned Safety Audit Blitzes which place emphasis on Gas Leak Investigations and Emergency Response Procedures. Commission Staff will be invited to observe the scheduled drills and audit blitzes, and LG&E will be open to all feedback and enhancement recommendations offered by Commission Staff specific to the way these drills and blitzes are planned, scheduled and executed.

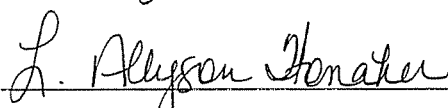
At the drills and blitzes, LG&E will: (1) explain steps taken to ensure employees are not made aware of the date, time or location of drills; (2) describe the procedure used to choose the date, time and location of drills; and (3) provide a list of all personnel who were given advanced knowledge of the drills and blitzes.

9. In the event the Commission does not accept this Settlement Agreement in its entirety, LG&E and Commission Staff reserve their rights to withdraw from it and require that a hearing be held on any and all issues involved and that none of the provisions contained within this Settlement Agreement shall be binding upon the parties, or used as an admission by LG&E of any liability in any legal proceeding, administrative proceeding or lawsuit arising out of the December 6, 2011 incident.
10. This Settlement Agreement is for use in Commission Case No. 2012-00239, and no party to this matter shall be bound by any part of this Settlement Agreement in any other proceeding, except that this Settlement Agreement may be used in any proceedings by the Commission to enforce the terms of this Settlement Agreement or to conduct a further investigation of LG&E's service. LG&E shall not be precluded or estopped from raising, in any other proceeding, any issue, claim or defense therein by reason of the execution of this Settlement Agreement.
11. LG&E and Commission Staff agree that this Settlement Agreement is reasonable, is in the public interest, and should be adopted in its entirety by the Commission. If adopted by the Commission, LG&E agrees to waive its right to a hearing and will not file any petition for rehearing or seek judicial appeal.

LOUISVILLE GAS AND ELECTRIC COMPANY

By: (print name) John P. Malloy
By: (sign name) 
Title: VP Energy Delivery Retail Business
Date: 18 January 2013

STAFF OF THE KENTUCKY PUBLIC SERVICE COMMISSION

By: (print name) L. Allyson Honaker
By: (sign name) 
Title: Staff Attorney III
Date: 1/22/13

Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRONIC COMPANY
Docket No. D-21-09
Attachment PPL-Acadia 1-9-1
Page 22 of 22

Ed Staton
VP - State Regulation and Rates
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202



Andy Beshear
Governor

Rebecca W. Goodman
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Michael J. Schmitt
Chairman

Robert Cicero
Vice Chairman

Talina R. Mathews
Commissioner

January 15, 2020

Robert Conroy, VP State Regulation & Rates
Louisville Gas and Electric Company
220 W. Main Street
P.O. Box 32010
Louisville, KY 40232-2010

Re: Standard Inspection

DEMAND FOR REMEDIAL MEASURES AND PENALTY ASSESSMENT

Dear Mr. Conroy:

Commission Staff (Staff) performed a standard periodic inspection of the gas distribution system of Louisville Gas & Electric Company (LG&E) on April 1-5 and 18, 2019. Based on its review of LG&E's operations and management practices, Staff prepared the attached Inspection Report dated May 14, 2019 (Report).

As detailed in the Report, Staff identified the following violations of federal pipeline safety standards during its inspection of LG&E's gas distribution system:

1. **49 CFR § 192.614** – Damage prevention program.

(a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purposes of this section, the term "excavation activities" includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.

...

(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

...

(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

Finding: LG&E failed to provide temporary marking of buried pipelines within 48 hours for approximately 131,698 facility locate requests received during the review period of 2016-2018. This constitutes a failure by LG&E to carry out a damage prevention program that provides for timely marking of buried pipelines as required by 49 CFR § 192.614(c)(5).

2. **49 CFR § 192.327 – Cover.**

(b) Except as provided in paragraphs (c) and (d) of this section, each buried main must be installed with at least 24 inches (610 millimeters) of cover.

Finding: Investigation of excavation damage to a 4-inch low pressure main that occurred on September 11, 2018, at 630 S. 4th Street in Louisville, Kentucky, established that the main was installed with approximately 7 inches of cover.

LG&E provided a response to the Report and its findings by letter dated June 20, 2019:

1. **49 CFR § 192.614** – LG&E asserts that many of its late locates fell under a statutory exemption to the 48-hour deadline to provide temporary marking of underground pipelines. LG&E acknowledges, however, late locate requests that did not fall within any exemption as well as a persistent backlog of locate requests during the review period.

LG&E indicated that the problem was due to poor performance by its contractors that have provided line locate services. LG&E states that as of December 14, 2018, it had hired two new companies to perform line locating services. LG&E stresses that it has taken appropriate measures to improve compliance with line locate requirements.

2. **49 CFR § 192.327** – LG&E notes that although 49 CFR § 192.327 requires each buried main to be installed with at least 24 inches of cover, less cover may be used where an underground structure prevents installation with the minimum cover, if it is provided with additional protection to withstand anticipated external loads. LG&E states that it was not possible to install the 4-inch low pressure main at 630 S. 4th Street with 24 inches of cover because of the location of other utility facilities in the area, so LG&E planned to install the pipe with a steel plate to withstand external loads. LG&E asserts that although the construction contractor represented that it had installed the steel plate, LG&E's investigation of the excavation damage revealed that the steel plate was not present.

Robert Conroy
January 15, 2020
Page 3

LG&E states that since the time of this installation, it has enhanced its training and certification program for pipeline inspectors. Additionally, LG&E states if it is not possible to install with 24 inches of cover and an additional protective measure must be taken, it now requires personnel to verify that the planned measure is in fact taken and then note the verification on the main construction report. LG&E

The information provided in LG&E's Response does not alter Staff's determination that LG&E violated 49 CFR § 192.614(c)(5) and § 192.327. The remedial measures that LG&E outlines in its Response are appropriately considered in the calculation of a civil penalty.

REMEDIAL MEASURES

Staff finds that LG&E has taken appropriate remedial measures to address the violations identified in the Report.

In its June 20, 2019 response to the Report, LG&E states that it has started an initiative to review other locations in downtown Louisville where mains were installed with less than minimum cover in order to confirm that additional protection was provided to withstand anticipated external loads. Within 15 days of the date of this letter, LG&E is directed to submit a report on the status of this initiative. The status report shall include the number of locations reviewed and identify any locations where LG&E determined that the planned additional protection was not provided.

CIVIL PENALTY

KRS 278.992(1) provides that any person who violates any minimum pipeline safety standard adopted by the United States Department of Transportation or any regulation adopted by the Commission governing the safety of pipeline facilities shall be subject to a civil penalty not to exceed the maximum civil penalty contained in 49 CFR § 190.223, as amended. Currently, the maximum civil penalty is \$218,647 for each violation for each day the violation continues, with a maximum administrative civil penalty not to exceed \$2,186,465 for any related series of violations.¹

In determining the amount of the proposed penalty, Staff considers the assessment factors set forth in KRS 278.992(1): "the size of the business of the person charged, the gravity of the violation, and the good faith of the person charged in

¹ Prior to July 14, 2018, the maximum civil penalty is \$100,000 for each violation for each day the violation continues, with a maximum administrative civil penalty not to exceed \$1,000,000 for any related series of violations. At the time of the September 11, 2018 excavation damage incident, the maximum civil penalty was \$209,002 for each violation for each day the violation continues, with a maximum administrative civil penalty not to exceed \$2,090,022 for any related series of violations.

Robert Conroy
January 15, 2020
Page 4

attempting to achieve compliance, after notification of the violation.” Additionally, Staff considers the assessment factors applied under federal law by the Associate Administrator for Pipeline Safety for PHMSA to determine the amount of the civil penalty for violation of a federal pipeline safety standard.²

Based on its investigation of this matter and consideration of the penalty assessment factors discussed above, Staff concludes that the LG&E should be assessed a civil penalty in the amount of \$150,000. Staff considers both of LG&E’s violations to be serious because they were causal factors in pipeline safety incidents. The gravity of LG&E’s failure to provide 24 inches of cover or additional protection to withstand external loads is heightened because it involved the defective installation of infrastructure. LG&E’s failure to carry out an effective damage prevention program in accordance with federal pipeline safety standards was a long-standing violation that persisted throughout the review period and is subject to assessment of a civil penalty for each day the violation continued, up to the cap for a related series of violations.

Staff recognizes the steps LG&E has taken to address the deficiencies in its damage prevention program and to improve its compliance with line locate requirements. Staff also acknowledges LG&E’s improvement in performing line locates in a timely manner. Staff recognizes the substantial investment LG&E has made to address the deficiencies in its damage prevention program. Finally, Staff recognizes the enhanced training LG&E now provides its pipeline inspectors and its initiative to review other locations in downtown Louisville where mains were installed with less than minimum cover to confirm that additional protection was provided to withstand anticipated external loads. Staff has taken these good faith efforts to achieve compliance into account in calculating the penalty to be assessed.

If the LG&E does not wish to contest the proposed civil penalty, it should mail or deliver a cashier’s check or money order made payable to the “**Kentucky State Treasurer**” in the amount of \$150,000 within 30 days of the date of this letter, to:

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

² Federal law provides that PHMSA shall consider: (1) the nature, circumstances and gravity of the violation, including adverse impact on the environment; (2) the degree of the respondent’s culpability; (3) the respondent’s history of prior offenses; (4) any good faith by the respondent in attempting to achieve compliance; and (5) the effect on the respondent’s ability to continue in business. The Associate Administrator also may consider: (1) the economic benefit gained from the violation, if readily ascertainable, without any reduction because of subsequent damages; and (2) such other matters as justice may require. See 49 CFR § 190.225.

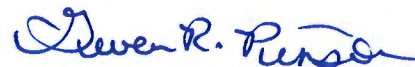
Robert Conroy
January 15, 2020
Page 5

Payment of the proposed civil penalty and completion of all remedial measures will satisfy and resolve any and all claims against the LG&E for violation of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199, as well as for any penalty that could be assessed under KRS 278.992(1), arising out of the pipeline safety violations cited herein. LG&E's payment of the proposed civil penalty will not be considered an admission by LG&E that it willfully violated any provision of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199. Upon payment of the proposed penalty, the Commission will confirm the resolution of this matter by entry of an order. Payment of the penalty constitutes a waiver by the LG&E of any right to a hearing in any proceeding initiated to close the investigation.

If LG&E does not pay the proposed civil penalty within 30 days of the date of this letter, the Commission will institute an administrative proceeding against LG&E and hold a formal hearing during which LG&E will have an opportunity to present evidence and show cause why it should not be subject to penalties under KRS 278.992(1) for the pipeline safety violations cited herein.

This demand letter addresses only those matters specifically referred to in this document. This demand letter does not waive or otherwise affect any obligations or liabilities that may result from other activities by the LG&E. If you have any questions, please contact John Park at 502-782-2589.

Sincerely,



Gwen R. Pinson
Executive Director

Attachment

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Michael Nantz	Report Number:	5142019
Inspection Date(s):	4/1,2,3,4,5,18/2019	Report Date:	5/14/2019
Inspection Type:	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	Louisville Gas and Electric	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	11824
Type of Facility:	Private Distribution	Location of Facility:	Louisville, Kentucky
Area of Operation:	Louisville and surrounding areas in Jefferson, Trimble, Oldham, Henry, Shelby, Bullitt, Nelson, Meade, and Hardin counties.		
<u>Official Operator Contact and Address: (Contact for Inspection Letter)</u> John Malloy, Vice President P.O. Box 32010 220 West Main Street Louisville, Kentucky 40232		<u>Unit Name and Address</u> 	
Phone # and Email:	John.Malloy@lge-ku.com		
Records Location:	East Operations Center, Louisville, KY		
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>
Dara Griggs	Gas Environmental & Compliance Coordinator	502-627-2543	Dara.Griggs@lge-ku.com
Tom Reith	Director Gas Operations, Construction & Engineering	502-627-3386	Tom.Reith@lge-ku.com
Joe Ryan	Manager, Gas Distribution Integrity and Compliance	502-367-5944	Joe.Ryan@lge-ku.com
Peter Clyde	Manager, Gas Transmission Integrity and Compliance	502-364-8715	Peter.Clyde@lge-ku.com
Barry Walker	Director, Gas Control & Storage	502-627-3038	Barry.Walker@lge-ku.com
Has the Operator provided an updated Emergency Contact List?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Number of Customers:	Approximately 326,000		
Number of Gas Employees:	Approximately 290		
Gas Supplier:	Tennessee Gas, Texas Gas and LGE Transmission		
Unaccounted for Gas:	1.43% (2018 Annual Report)		
Services:	Residential	Commercial	Industrial Other
	300,410 (All 1" to over 8")		
Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)	

Feeder:	<u>Low Pressure</u> .05 psig; <u>Elevated Pressure Distribution</u> 3.0 psig; <u>Medium Pressure Distribution</u> 15 psig to 60 psig; <u>High Pressure Distribution</u> 99 psig to 350 psig	
Town:		
Other:		
Does the Operator have any transmission pipeline (above 20% SMYS):		No
Additional Operator Information:		

Date of Last Inspection:	8/22/2016		
Number of Deficiencies:	1	Deficiencies not Cleared:	0

Summary of Areas Inspected

<u>PHMSA Question Set</u>			
<input checked="" type="checkbox"/> Emergency Plan (PHMSA Form 2)	<input checked="" type="checkbox"/> Operations and Maintenance Plan (PHMSA Form 2)	<input checked="" type="checkbox"/> Critical Valves Maintenance Inspections	
<input checked="" type="checkbox"/> Cathodic Protection (PHMSA Form 2)	<input type="checkbox"/> Accidents - (PHMSA Form 11)	<input checked="" type="checkbox"/> Leak Surveys	
<input checked="" type="checkbox"/> Odorization - (PHMSA Form 2)	<input checked="" type="checkbox"/> Operator Qualification (PHMSA Form 15 - Protocol 9)	<input checked="" type="checkbox"/> Damage Prevention (PHMSA Form 2)	
<input checked="" type="checkbox"/> Pipeline ROW Markers (PHMSA Form 2)	<input type="checkbox"/> Regulator Stations	<input checked="" type="checkbox"/> DIMP - (PHMSA Form 24)	
<input checked="" type="checkbox"/> Field Inspection (PHMSA Form 15)	<input checked="" type="checkbox"/> NTSB Supplemental Questions	<input checked="" type="checkbox"/> PAPE - (PHMSA Form 2)	
<input checked="" type="checkbox"/> Public Awareness (PHMSA Form 2)	<input type="checkbox"/> Other		
<u>Other:</u>			

<u>State Question Set</u>	
<input checked="" type="checkbox"/> Cybersecurity	<input type="checkbox"/> Other
<u>Other:</u>	

Summary

This standard inspection involved the review of Louisville Gas & Electric Company's operations and the company's compliance with 49 CFR Parts 191 and 192. The inspection covered the company's Operating and Maintenance, Emergency, Damage Prevention, Operator Qualifications, Distribution Integrity Management, Cathodic Protection, Odorization, and Leak Survey records. Records were reviewed at the company's East Operations Center in Louisville. Field inspections consisted of company's city gate station, district regulator stations and large customer metering locations in the area. A Protocol 9 was conducted regarding odorant checks and cathodic protection measurements.

Records reviewed were in good order and except for the deficiencies noted below regarding the company's Damage Prevention program and a Depth of Cover issue regarding a Low Pressure Main, the company's operations review were found to be compliant. Field inspections and the Protocol 9 performed on field personnel resulted in no compliance issues. Two positive areas to note were the company's Operation Qualification (OQ) Plan and the Distribution Integrity Management Plan (DIMP) which both provided evidence of the company's commitment to these important operational programs.

An exit interview was conducted in which the company was made aware of the Damage Prevention plan deficiency described in detail below. The second deficiency regarding the Depth of Cover was discussed with LG&E, but at the time of the interview it had not been determined if it would be investigated as a part of this report or as a separate investigation. The company was made aware of the inclusion of this deficiency in this inspection report at a later date. There were no other deficiencies noted during this inspection.

The inspection checklist contains in the "Notes" section provides cites to the company's Operation and Maintenance or Procedure Manuals or other company documents where applicable.

All previous deficiencies from the 2016 Inspection Report had been corrected.

Pipeline Safety staff appreciates the efforts and professionalism of the company's staff during the inspection process.

Probable Violations

1. *CFR 192.614(c)(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.*

Records obtained from Louisville Gas & Electric Company during the Commission's Damage Prevention Enforcement investigations of KRS 367.4901-4917 (Dig Law) incidents of reported excavation damages from the company provided evidence of non-compliance with the cited regulation. During the performance years covered in this inspection, 2016, 2017, and 2018, the following data was provided to the Commission's Damage Prevention Enforcement and Pipeline Safety staff regarding the timeliness of the company's locating responsibility to locate request submitted through KY 811. As noted below in the company's data provided, the company failed to provide timely facility locates for approximately 131,698 requests received from KY 811 during the period covered by this inspection.

Louisville Gas & Electric (Gas)

	<u>2016</u>	<u>2017</u>	<u>2018</u>
<u>Total Tickets</u>	156,413	161,906	143,221
<u><48 hours</u>	123,157	120,092	84,843
<u>>48 hours</u>	33,256	41,814	56,628
<u>%>48 hours</u>	21.26%	25.83%	39.54%

2. 192.327(b) Except as provided in paragraphs(c) and(d) of this section, each buried main must be installed with at least 24 inches (610 millimeters) of cover.

At the time of this inspection, an investigation by the Commission's Damage Prevention Enforcement staff of a reported damage at 630 S. 4th Street Louisville, KY discovered that a 4 inch Low Pressure main was damaged. The incident occurred on 9/11/2018. Photographs and correspondence with LG&E staff confirmed the main to have approximately 7 inches of cover at the time of the damage. Damage Prevention Enforcement Staff informed the Pipeline Safety Staff of the incident for review under CFR 192. Documentation of the incident is contained in the company's Gas Excavation Damage Report Number 21036 and Enforcement Staff report number 3724.f

Areas of Concern

There were no Areas of Concern noted.

Submitted By:



Inspector 5/14/2019
Utility Regulatory and Safety Investigator

Procedures - Reporting *

*** 1. Immediate Reporting: Incidents (detail)** *Is there a process to immediately report incidents to the National Response Center? (RPT.RR.IMMEDREPORT.P) (detail)*

191.5(b) (191.7)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GEOP Section 5

*** 2. Incident Reports (detail)** *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident? (RPT.RR.INCIDENTREPORT.P) (detail)*

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GEOP Section 5

3. Supplemental Incident Reports (detail) *Does the process require preparation and filing of supplemental incident reports? (RPT.RR.INCIDENTREPORTSUPP.P) (detail)*

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GEOP & I-GN-SR-001

*** 4. National Registry of Pipeline and LNG Operators (OPID) (detail)** *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs)? (RPT.RR.OPID.P) (detail)*

191.22

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GEOP & I-GN-SR-001

5. Safety Related Condition Reports (detail) *Do the procedures require reporting of safety-related conditions? (RPT.RR.SRCR.P) (detail)*

192.605(a) (191.23(a); 191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GEOP & I-GN-SR-001

6. Offshore Pipeline Condition Reports (detail) *Does the process require reports to be submitted within 60 days after completing inspection of underwater pipelines in GOM and its inlets? (RPT.RR.OPCR.P) (detail)*

191.27(a) (191.27(b); 192.612(a))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

7. Safety Related Conditions (detail) *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions? (MO.GO.SRC.P) (detail)*

192.605(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B pages 13-15

Procedures - Customer and EFV Installation Notification

1. Customer Notification (detail) *Is a customer notification process in place that satisfies the requirements of 192.16?* (MO.GO.CUSTNOTIFY.P) (detail)

192.13(c) (192.16(a); 192.16(b); 192.16(c);
 192.16(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OMI GOM & I-PO-VM 002

Also, website offer customers option to install, email notifications referring customers to website for additional information, included in new customer packets.

2. EFV Installation (detail) *Is there an adequate excess flow valve (EFV) installation and performance program in place?* (MO.GO.EFVINSTALL.P) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c);
 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Yes

Procedures - Normal Operating And Maintenance

1. Normal Maintenance and Operations (detail) *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?* (MO.GO.OMANNUALREVIEW.P) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Annual reviews GOMI GN-004

2. Normal Operations and Maintenance Procedures - History (detail) *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.P) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-FM-003

3. Normal Operations and Maintenance Procedures (detail) *Does the process include procedures for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?* (MO.GOMAOP.MAOPLIMIT.P) (detail)

192.605(a) (192.605(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM & I-SO-MA-001; GOM & I-PO-RS-001

4. Normal Operations and Maintenance Procedures - Review (detail) *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found?* (MO.GO.OMEFFECTREVIEW.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM & I-PO-EP-001

5. Safety While Making Repairs (detail) Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property? (AR.RMP.SAFETY.P) (detail)

192.605(b)(9) (192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I-PO-EP-001

6. Holders (detail) Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders? (MO.GM.HOLDER.P) (detail)

192.605(a) (192.605(b)(10))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

7. Gas Odor Response (detail) Does the process require prompt response to the report of a gas odor inside or near a building? (MO.GO.ODDOR.P) (detail)

192.605(a) (192.605(b)(11))

Sat+	Sat	Concern	Unsat	NA	NC

Notes: GEOP Section 4

Procedures - Change In Class Location

1. Change in Class Location Required Study (detail) Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS? (MO.GOCLASS.CLASSLOCATESTUDY.P) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c);
 192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be reviewed in Transmission Inspection

*** 2. Change in Class Location Confirmation or Revision of MAOP (detail)** Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location? (MO.GOCLASS.CLASSLOCATEREV.P) (detail)

192.605(b)(1) (192.611(a); 192.611(b); 192.611(c);
 192.611(d))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be reviewed in Transmission Inspection

Procedures - Continuing Surveillance

1. Continuing Surveillance (detail) Does the process include procedures for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists? (MO.GO.CONTSURVEILLANCE.P) (detail)

192.605(e) (192.613(a); 192.613(b); 192.703(b);
 192.703(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-CS-001 used as procedure

Procedures - Damage Prevention Program

1. Damage Prevention Program (detail) *Is a damage prevention program approved and in place?* (PD.OC.PDPPROGRAM.P) (detail)

192.614(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: New Public Awareness Coordinators on staff to increase focus on excavator relations. New software in place to improve tracking/reporting and distribution of locate requests.

Procedures - Emergency

1. Receiving Notices (detail) *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?* (EP.ERG.NOTICES.P) (detail)

192.615(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 3

2. Emergency Response Communication (detail) *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?* (EP.ERG.COMMSYS.P) (detail)

192.615(a) (192.615(a)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: NIMs standard includes a scalable response team

*** 3. Emergency Response (detail)** *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?* (EP.ERG.RESPONSE.P) (detail)

192.615(a) (192.615(a)(3); 192.615(a)(11);
 192.615(b)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 4

4. Emergency Response (detail) *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?* (EP.ERG.READINESS.P) (detail)

192.615(a) (192.615(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes:

5. Emergency Response - Actions (detail) *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?* (EP.ERG.PUBLICPRIORITY.P) (detail)

192.615(a) (192.615(a)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 3.5 & 4.0

6. Emergency Response (detail) Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property? (EP.ERG.PRESSREDUCESD.P) (detail)

192.615(a) (192.615(a)(6))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 7.0

7. Emergency Response - Hazards (detail) Does the emergency plan include procedures for making safe any actual or potential hazard to life or property? (EP.ERG.PUBLICHAZ.P) (detail)

192.605(a) (192.615(a)(7))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 4

8. Public Official Notification (detail) Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency? (EP.ERG.AUTHORITIES.P) (detail)

192.615(a) (192.615(a)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 10 (Liaison) Section 5 (Notification Procedures)

9. Service Outage Restoration (detail) Does the emergency plan include procedures for safely restoring any service outage? (EP.ERG.OUTAGERESTORE.P) (detail)

192.615(a) (192.615(a)(9))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 8

10. Incident Investigation Actions (detail) Does the process include procedures for beginning action under §192.617, if applicable, as soon after the end of the emergency as possible? (EP.ERG.INCIDENTACTIONS.P) (detail)

192.615(a) (192.615(a)(10))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I-PO-IF-001 Section 6.1

11. Emergency Response Training (detail) Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective? (EP.ERG.TRAINING.P) (detail)

192.615(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GEOP Section 9

12. Emergency Response Performance (detail) Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVNTREVIEW.P) (detail)

192.615(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 9 GOMI PO-IF-001

13. Liaison with Public Officials (detail) Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners? (EP.ERG.LIAISON.P) (detail)

192.615(c) (192.615(c)(1); 192.615(c)(2);
 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 10

Procedures - Public Awareness Program

1. Public Education Program (detail) Has the continuing public education (awareness) program been established as required? (PD.PA.PROGRAM.P) (detail)

192.616(a) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Public Awareness Plan (PAP)

2. Management Support of Public Awareness Program (detail) Does the operator's program documentation demonstrate management support? (PD.PA.MGMTSUPPORT.P) (detail)

192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 3

3. Asset Identification (detail) Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each? (PD.PA.ASSETS.P) (detail)

192.616(b) (API RP 1162 Section 2.7 Step 4)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 6

4. Audience Identification (detail) Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents? (PD.PA.AUDIENCEID.P) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP pages 13-18

5. Messages, Delivery Methods, and Frequencies (detail) Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported? (PD.PA.MESSAGES.P) (detail)

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP pages 21-23

6. Consideration of Supplemental Enhancements (detail) *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162? (PD.PA.SUPPLEMENTAL.P) (detail)*

192.616(c) (API RP 1162 Section 6.2)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 24 section 3.6.2

7. Other Languages (detail) *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas? (PD.PA.LANGUAGE.P) (detail)*

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Only if census data supports as described in API RP 1162. Discussed further study to determine if excavator community census would support non-English messaging.

8. Evaluation Plan (detail) *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated? (PD.PA.EVALPLAN.P) (detail)*

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP Section 4 page 27

9. Master Meter and Petroleum Gas Systems (detail) *Does the master meter or petroleum gas system operator's process meet the requirements of 192.616(j)? (PD.PA.MSTRMETER.P) (detail)*

192.616(j) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Procedures - Failure Investigation

1. Incident Investigation (detail) *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence? (EP.ERG.INCIDENTANALYSIS.P) (detail)*

192.617

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I-PO-IF 001 Section 6.1

Procedures - MAOP

1. Maximum Allowable Operating pressure Determination (detail) *Does the process include procedures for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619? (MO.GOMAOP.MAOPDETERMINE.P) (detail)*

192.605(b)(1) (192.619(a); 192.619(b); 192.621(a); 192.621(b); 192.623(a); 192.623(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-MA-001

Procedures - Pressure Test

1. Test Acceptance Criteria and Procedures (detail) *Were test acceptance criteria and procedures sufficient to assure the basis for an acceptable pressure test?* (AR.PTI.PRESSTESTACCEP.P) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d);
 192.505(a); 192.505(b); 192.505(c); 192.505(d);
 192.505(e); 192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI PO-TE-001

Procedures - Odorization Of Gas

1. Odorization of Gas (detail) *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with §192.625?* (MO.GOODOR.ODORIZE.P) (detail)

192.605(b)(1) (192.625(a); 192.625(b); 192.625(c);
 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI PO-OD-001 Injection sites located at City Gate and at Compressor stations relating to storage.

Procedures - Tapping Pipelines Under Pressure

1. Tapping Pipelines Under Pressure (detail) *Is the process adequate for tapping pipelines under pressure?* (AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-TA-001 Procedure 6

2. Qualification of Personnel Tapping Pipelines under Pressure (detail) *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?* (TQ.QU.HOTTAPQUAL.P) (detail)

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B Pages 13-14

Procedures - Pipeline Purging

1. Pipeline Purging (detail) *Does the process include requirements for purging of pipelines in accordance with 192.629?* (MO.GOODOR.PURGE.P) (detail)

192.605(b)(1) (192.629(a); 192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-PU-001 Section 6 Procedures

Procedures - Control Room Management

See separate Control Room Management question set. (Not performed during this inspection)

Procedures - Transmission Lines - Patrolling & Leakage Survey

1. Patrolling Requirements (detail) Does the process adequately cover the requirements for patrolling the ROW and conditions reported? (PD.RW.PATROL.P) (detail)

192.705(a) (192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

2. Leakage Surveys (detail) Does the process require leakage surveys to be conducted? (PD.RW.LEAKAGE.P) (detail)

192.706 (192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

Procedures - Distribution System Patrolling & Leakage Survey

1. Distribution System Leakage Surveys (detail) Does the process require distribution system patrolling and leakage surveys to be conducted? (PD.RW.DISTLEAKAGE.P) (detail)

192.721 (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-PA-001 and 007

Procedures - Line Marker

1. ROW Markers Requirements (detail) Does the process adequately cover the requirements for placement of ROW markers? (PD.RW.ROWMARKER.P) (detail)

192.707(a) (192.707(b); 192.707(c); 192.707(d); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-PO-005 Section 6.8

Procedures - Transmission Record Keeping

1. Transmission Lines Record Keeping (detail) Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test? (MO.GM.RECORDS.P) (detail)

192.605(b)(1) (192.709(a); 192.709(b); 192.709(c); 192.743(f))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

Procedures - Transmission Field Repair

1. Transmission Lines Permanent Field Repair of Defects (detail) *Is the process adequate for the permanent field repair of defects in transmission lines?* (AR.RMP.FIELDREPAIRDEFECT.P) (detail)

192.605(b)(1) (192.713(a); 192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

2. Transmission Lines Permanent Field Repair of Welds (detail) *Is the process adequate for the permanent field repair of welds?* (AR.RMP.FIELDREPAIRWELDS.P) (detail)

192.605(b) (192.715(a); 192.715(b); 192.715(c))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

3. Transmission Lines Permanent Field Repair of Leaks (detail) *Is there an adequate process for the permanent field repair of leaks on transmission lines?* (AR.RMP.FIELDREPAIRLEAK.P) (detail)

192.605(b) (192.717(a); 192.717(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

4. Transmission Lines Testing of Repairs (detail) *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTEST.P) (detail)

192.605(b) (197.719(a); 197.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

Procedures - Test Requirements For Reinstating Service Lines

1. Test Reinstated Service Lines (detail) *Is the process adequate for the testing of disconnected service lines?* (AR.RMP.TESTREINSTATE.P) (detail)

192.605(b) (197.725(a); 197.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-TE-001 Section 6.11 Construction Standards GCS 20-10-005

Procedures - Abandonment Or Deactivation Of Facilities

1. Abandonment or Deactivation of Pipe and Facilities (detail) *Does the process include procedures for the abandonment and deactivation of pipelines that are in accordance with 192.727?* (MO.GM.ABANDONPIPE.P) (detail)

192.605(b)(1) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-AB-001

Procedures - Pressure Limiting And Regulating Station

1. Pressure Limiting and Regulating Stations Inspection and Testing (detail) Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment at intervals not exceeding 15 months, but at least once each calendar year as required? (MO.GMOPP.PRESSREGTEST.P) (detail)

192.605(b)(1) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-RS-001 Section 4.2.1 Procedures as outlined in 192.730

2. Pressure Telemetry or Recording Gauges (detail) Does the process require telemetry or recording gauges be utilized as required for distribution systems? (MO.GMOPP.PRESSREGMETER.P) (detail)

192.605(b)(1) (192.741(a); 192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-RS-001 Section 6.3

3. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) Does the process include procedures for ensuring, either by testing or a review of calculations, at intervals not exceeding 15 months, but at least once each calendar year, that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations has sufficient capacity, and for installing a new or additional device if a relief device is determined to have insufficient capacity? (MO.GMOPP.PRESSREGCAP.P) (detail)

192.605(b)(1) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-RS-001 Section 6.2.3

Procedures - Valve And Vault Maintenance

1. Valve Maintenance Transmission Lines (detail) Does the process include procedures for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable? (MO.GM.VALVEINSPECT.P) (detail)

192.605(b)(1) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

2. Valve Maintenance Distribution Lines (detail) Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable? (MO.GM.DISTVALVEINSPECT.P) (detail)

192.605(b)(1) (192.747(a); 192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-VM-002 Section 6.1

Procedures - Vault Inspection

1. Vault Inspection (detail) Does the process provide adequate direction for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment and are inspections to be performed at the required interval? (FS.FG.VAULTINSPECTFAC.P) (detail)

192.605(b)(1) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: All vaults are below code 192.749(a) size requirement (internal content < 200 cubic feet) for inspections.

Procedures - Prevention Of Accidental Ignition

1. Prevention of Accidental Ignition (detail) Does the manual include procedures for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion? (MO.GM.IGNITION.P) (detail)

192.605(b)(1) (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-AI-001

Procedures - Caulked Bell And Spigot Joints

1. Bell and Spigot Joints (detail) Does the process require that caulked bell and spigot joints be correctly sealed? (MO.GM.BELLSPIGOTJOINT.P) (detail)

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: Cast iron effectively removed. If found on system the B&S Joints will be removed from service.

Procedures - Protecting Cast-Iron Pipeline

1. Protecting Cast-Iron Pipeline (detail) Does the process require adequate protection for segments of a buried cast-iron pipeline for which support has been disturbed? (MO.GM.CASTIRONPROTECT.P) (detail)

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No known cast iron pipeline in system.

Procedures - Welding And Weld Defect Repair/Removal

1. Welding Procedures (detail) Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail? (DC.WELDPROCEDURE.WELD.P) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B pages 13-14 Welding Manual 4.1.1

*** 2. Qualification of Welders (detail)** Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code? (TQ.QUOMCONST.WELDER.P) (detail)

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B

3. Qualification of Welders for Low Stress Pipe (detail) Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192? (TQ.QUOMCONST.WELDERLOWSTRESS.P) (detail)

192.227(b) (192.225(a); 192.225(b); 192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: per Appendix C, all are required--Welding Manual

4. Limitations on Welders (detail) Does the process require certain limitations be placed on welders? (DC.WELDERQUAL.WELDERLIMITNDT.P) (detail)

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Manual Section 4.1.1

5. Welding Weather (detail) Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld? (DC.WELDPROCEDURE.WELDWEATHER.P) (detail)

192.303 (192.231)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Inspection Guidelines Section 6.2.7 Welding Manual Section 10.1

6. Miter joints (detail) Does the process prohibit the use of certain miter joints? (DC.WELDPROCEDURE.MITERJOINT.P) (detail)

192.303 (192.233(a); 192.233(b); 192.233(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Manual Section 7.0 (Weld Joint Fit Up)

7. Preparation for Welding (detail) Does the process require certain preparations for welding, in accordance with §192.235? (DC.WELDPROCEDURE.WELDPREP.P) (detail)

192.303 (192.235)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

8. Inspection and Test of Welds (detail) Does the process require visual inspections of welds to be conducted by qualified inspectors? (DC.WELDINSPECTION.WELDVISUALQUAL.P) (detail)

192.303 (192.241(a); 192.241(b); 192.241(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Inspection Guidelines Section 6.0

9. Repair or Removal of Weld Defects (detail) *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245? (DC.WELDINSP.WELDREPAIR.P) (detail)*

192.303 (192.245(a); 192.245(b); 192.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Inspection Section 6.5

Procedures - Nondestructive Testing

1. Nondestructive Test and Interpretation Procedures (detail) *Is there a process for nondestructive testing and interpretation? (DC.WELDINSP.WELDNDT.P) (detail)*

192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243(e).)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Manual Section 5 page 2

Procedures - Joining Of Pipeline Materials

1. Plastic Pipe Joints (detail) *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281? (DC.CO.PLASTICJOINT.P) (detail)*

192.303 (192.273(b); 192.281(a); 192.281(b); 192.281(c); 192.281(d); 192.281(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Plastic Welding Manual (Fusion) Section 1.0

2. Plastic pipe - Qualifying Joining Procedures (detail) *Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints? (DC.CO.PLASTICJOINTPROCEDURE.P) (detail)*

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Plastic Welding Manual (Fusion) Section 6.0

3. Plastic pipe - Qualifying Joining Procedures (detail) *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified? (DC.CO.PLASTICJOINTQUAL.P) (detail)*

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.805)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B pages 13-14

4. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified? (DC.CO.PLASTICJOINTINS.P) (detail)*

192.287 (192.805(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section A pages 22-23; Section B pages 13-15

Procedures - Corrosion Control

1. Corrosion Control Personnel Qualification (detail) Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel? (TQ.QU.CORROSION.P) (detail)

192.453 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&I- CC-AC-001; OQ Plan Section B Pages 12-15

2. New Buried Pipe Coating (detail) Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)? (TD.COAT.NEWPIPE.P) (detail)

192.605(b)(2) (192.455(a); 192.461; 192.463;
192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-EC-001 and 002

3. Conversion to Service - Pipe Coating (detail) Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)? (TD.COAT.CONVERTPIPE.P) (detail)

192.605(b)(2) (192.452(a); 192.455(a); 192.455(b);
192.461(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-EC-002

4. Cathodic Protection post July 1971 (detail) Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.P) (detail)

192.605(b)(2) (192.455(a); 192.457(a); 192.452(a);
192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI Section 6.1.3

5. Use of Aluminum (detail) Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline? (TD.CP.ALUMINUM.P) (detail)

192.605(b)(2) (192.455(e))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: Discussed in GOMI 6.1.2

6. Cathodic Protection pre August 1971 (detail) Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.P) (detail)

192.605(b)(2) (192.457(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.1.4

7. Examination of Exposed Portions of Buried Pipe (detail) Does the process require that exposed portions of buried pipeline must be examined for external corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.4 (3 feet in both directions of exposed corroded pipe)

8. Further Examination of Exposed Portions of Buried Pipe (detail) Does the process require further examination of exposed buried pipe if corrosion is found? (TD.CPEXPOSED.EXPOSECORRODE.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes; GOMI-CC Section 6.4.4

9. Cathodic Protection Monitoring Criteria (detail) Does the process require CP monitoring criteria to be used that is acceptable? (TD.CPEXPOSED.MONITORCRITERIA.P) (detail)

192.605(b)(2) (192.463(a); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.5.2

10. Cathodic Protection of Amphoteric Metals (detail) Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline? (TD.CP.AMPHOTERIC.P) (detail)

192.605(b)(2) (192.463(b); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.1. and 6.2.7 (None know to be in the system would be replaced if found)

11. Cathodic Protection Monitoring (detail) Does the process adequately describe how to monitor CP that has been applied to pipelines? (TD.CP.MONITOR.TEST.P) (detail)

192.605(b)(2) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.3

12. Rectifiers or other Impressed Current Sources (detail) Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources? (TD.CP.MONITOR.CURRENTTEST.P) (detail)

192.605(b)(2) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.3.2 (38 total on system including Transmission)

13. Bonds, Diodes and Reverse Current Switches (detail) Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches? (TD.CP.MONITOR.REVCURRENTTEST.P) (detail)

192.605(b)(2) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.3.2

14. Correction of Corrosion Control Deficiencies (detail) Does the process require that the operator correct any identified deficiencies in corrosion control? (TD.CP.MONITOR.DEFICIENCY.P) (detail)

192.605(b)(2) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.3.3

15. Unprotected Buried Pipelines (typically bare pipelines) (detail) Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection? (TD.CP.UNPROTECT.P) (detail)

192.605(b)(2) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.3.3 (Monitors but addressing bare areas through replacement program)

16. Isolation from Other Metallic Structures (detail) Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.P) (detail)

192.605(b)(2) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC EC-003 Section 6

17. Test Leads Installation (detail) Does the process provide adequate instructions for the installation of test leads? (TD.CP.MONITOR.TESTLEAD.P) (detail)

192.605(b)(2) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-EC-001 Section 6.5.2

18. Interference Currents (detail) Does the process give sufficient guidance and detail for identifying areas of potential stray current so the detrimental effects of stray currents can be minimized through a continuing program? (TD.CP.MONITOR.INTERCURRENT.P) (detail)

192.605(b)(2) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-EC-001 Section 6.6.1; 6.6.2; 6.6.3

19. Internal Corrosion (detail) If the process does not preclude corrosive gas to be transported by pipeline, does the process also require that the corrosive effect of the gas on the pipeline be investigated and steps be taken to minimize internal corrosion? (TD.ICP.CORRGAS.P) (detail)

192.605(b)(2) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC IC-001 (All transmission gas is monitored at the take station and potential issues are addressed prior to entering the Distribution system)

20. Internal Corrosion in Cutout Pipe (detail) Does the process direct personnel to examine removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.P) (detail)

192.605(b)(2) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-EC-001 Section 6.5 and 6.6

21. Internal Corrosion Control: Design and Construction (192.476) (detail) Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of §192.476? (DC.DPC.INTCORRODE.P) (detail)

192.453 (192.476(a); 192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

22. Internal Corrosion Corrosive Gas Actions (detail) Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.P) (detail)

192.605(b)(2) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

23. Atmospheric Corrosion (detail) Does the process give adequate guidance for protecting above ground pipe from atmospheric corrosion? (TD.ATM.ATMCORRODE.P) (detail)

192.605(b)(2) (192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-AC-001 Section 6.1 and for bridge crossings Section 6.2.4

24. Atmospheric Corrosion Monitoring (detail) Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.P) (detail)

192.605(b)(2) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-AC-001 Section 6.2

25. Repair of Corroded Pipe (detail) Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall? (AR.RCOM.REPAIR.P) (detail)

192.491(c) (192.485(a); 192.485(b); 192.487(a); 192.487(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-RM-001 Section 6.3

26. Evaluation of Internally Corroded Pipe (detail) Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded? (TD.ICP.EVALUATE.P) (detail)

192.605(b)(2) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-RM-001 Section 6.7.2

27. Graphitization of Cast Iron and Ductile Iron (detail) Does the process give adequate guidance for remediation of graphitization of cast iron or ductile iron pipe? (TD.CP.GRAPHITIZE.P) (detail)

192.605(b)(2) (192.489(a); 192.489(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No known cast or Ductile Iron. If found would be replaced

28. Corrosion Control Records (detail) Does the process include records requirements for the corrosion control activities listed in 192.491? (TD.CP.RECORDS.P) (detail)

192.605(b)(2) (192.491(a); 192.491(b); 192.491(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-RM-001 Section 11

Field Review - Pipeline Inspection (Field)

1. Transmission Line Valve Spacing (detail) Are transmission line valves being installed as required of 192.179? (DC.DPC.VALVESPACE.O) (detail)

192.141 (192.179(a); 192.179(b); 192.179(c); 192.179(d))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

2. Cathodic Protection Monitoring Criteria (detail) Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria? (TD.CP.MONITOR.MONITORCRITERIA.O) (detail)

192.463(a)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

3. Rectifier or other Impressed Current Sources (detail) Are impressed current sources properly maintained and are they functioning properly? (TD.CP.MONITOR.CURRENTTEST.O) (detail)

192.465(b)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

4. Internal Corrosion Control: Design and Construction (192.476) (detail) Does the transmission project's design and construction comply with 192.476? (DC.DPC.INTCORRODE.O) (detail)

192.476(a) (192.476(b); 192.476(c))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

5. Atmospheric Corrosion Monitoring (detail) Is pipe that is exposed to atmospheric corrosion protected? (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

6. Normal Operations and Maintenance Procedures - Review (detail) Are operator personnel knowledgeable of the procedures used in normal operations? (MO.GO.OMEFFECTREVIEW.O) (detail)

192.605(b)(8)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

7. Placement of ROW Markers (detail) Are line markers placed and maintained as required?
 (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5;
 CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

8. Placement of ROW Markers (detail) Are line markers placed and maintained as required for
 above ground pipelines? (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5;
 CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

9. Transmission Lines Testing of Repairs (detail) Does the operator properly test replacement
 pipe and repairs made by welding on transmission lines? (AR.RMP.WELDTTEST.O) (detail)

192.719(a) (192.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

10. Pressure Telemetry or Recording Gauges (detail) Are telemetry or recording
 gauges properly utilized as required for distribution systems? (MO.GMOPP.PRESSREGMETER.O) (detail)

192.741(a) (192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

11. Pressure Limiting and Regulating Stations Inspection and Testing (detail) Are
 field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?
 (MO.GMOPP.PRESSREGTEST.O) (detail)

192.739(a) (192.739(b); 192.743)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

12. Valve Maintenance Transmission Lines (detail) Are field inspection and partial operation
 of transmission line valves adequate? (MO.GM.VALVEINSPECT.O) (detail)

192.745(a) (192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

13. Prevention of Accidental Ignition (detail) Perform observations of selected locations to
 verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.
 (AR.RMP.IGNITION.O) (detail)

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records - Regulatory Reporting Performance

1. Immediate Reporting: Incidents (detail) Do records indicate immediate notifications of incidents were made in accordance with 191.5? (RPT.RR.IMMEDREPORT.R) (detail)

191.5(a) (191.7(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

2. Incident Reports (detail) Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe? (RPT.RR.INCIDENTREPORT.R) (detail)

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Example—Hurstborne/Taylorville Road damage

3. Supplemental Incident Reports (detail) Do records indicate accurate supplemental incident reports were filed and within the required timeframe? (RPT.RR.INCIDENTREPORTSUPP.R) (detail)

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

4. Annual Report Records (detail) Have complete and accurate Annual Reports been submitted? (RPT.RR.ANNUALREPORT.R) (detail)

191.17(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

5. Safety Related Condition Reports (detail) Do records indicate safety-related condition reports were filed as required? (RPT.RR.SRCR.R) (detail)

191.23(a) (191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: None reported

6. Customer Notification (detail) Do records indicate the customer notification process satisfies the requirements of 192.16? (MO.GO.CUSTNOTIFY.R) (detail)

192.16(d) (192.16(a); 192.16(b); 192.16(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

7. NPMS: Abandoned Underwater Facility Reports (detail) Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? (RPT.RR.NPMSABANDONWATER.R) (detail)

192.727(g)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Records - Construction Performance

1. Welding Procedures (detail) Do records indicate weld procedures are being qualified in accordance with 192.225? (DC.WELDPROCEDURE.WELD.R) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed. WPS-GMAW-DH-ER 705-6

2. Qualification of Welders (detail) Do records indicate adequate qualification of welders? (TQ.QUOMCONST.WELDER.R) (detail)

192.227(a) (192.227(b); 192.229(a); 192.229(b);
 192.229(c); 192.229(d); 192.328(a); 192.328(b);
 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed. Welder Certification required twice annually then proceed to OQ.

3. Inspection and Test of Welds (detail) Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)? (DC.WELDINSR.WELDVISUALQUAL.R) (detail)

192.241(a) (192.241(b); 192.241(c); 192.807(a);
 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed. OQ Plan Section J page 27

4. Qualification of Nondestructive Testing Personnel (detail) Do records indicate the qualification of nondestructive testing personnel? (TQ.QUOMCONST.NDT.R) (detail)

192.243(b)(2) (192.807(a); 192.807(b); 192.328(a);
 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed. OQ Section J page 27

5. Nondestructive Test and Interpretation Procedures (detail) Do records indicate that NDT implementation is adequate? (DC.WELDINSR.WELDNDT.R) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2);
 192.243(c); 192.243(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

6. Transmission Lines Record Keeping (detail) Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test? (MO.GM.RECORDS.R) (detail)

192.605(b)(1) (192.243(f); 192.709(a); 192.709(b);
 192.709(c))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

7. Plastic pipe - Qualifying Joining Procedures (detail) Have plastic pipe joining procedures been qualified in accordance with 192.283? (DC.CO.PLASTICJOINTPROCEDURE.R) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c);
 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

8. Plastic pipe - Qualifying Joining Procedures (detail) Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285? (DC.CO.PLASTICJOINTQUAL.R) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c);
 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes; Records Reviewed

9. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) Do records indicate persons inspecting the making of plastic pipe joints have been qualified? (DC.CO.PLASTICJOINTINSP.R) (detail)

192.287 (192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records Reviewed

10. Underground Clearance (detail) Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe? (DC.CO.CLEAR.R) (detail)

192.325(a) (192.325(b); 192.325(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed. GCS 1040100 Section 9.0

11. Depth of Cover - Onshore (detail) Is onshore piping minimum cover as specified in 192.327? (DC.CO.COVER.R) (detail)

192.327(a) (192.327(b); 192.327(c), 192.327(d);
 192.327(e))

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes: This requirement is covered in GCS 1040100 Section 9.4. However, the Commission's Dig Law Enforcement staff reported to Pipeline Safety staff a reported facility damage incident at 630 South Main Street in Louisville at which a 4 inch Low Pressure main under approximately 7 inches of cover was damaged. This is listed as a Probable Violation in the report.

12. EFV Installation (detail) Do records indicate the EFV program satisfies the requirements for installation and performance? (MO.GO.EFVINSTALL.R) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c);
 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed including 2018 Annual Report

13. Cathodic Protection post July 1971 (detail) Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.R) (detail)

192.491(c) (192.455(a); 192.457(a); 192.452(a);
 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed

Records - Operations And Maintenance Performance

1. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with 192.505? (DC.PT.PRESSTESTHIGHSTRESS.R) (detail)*

192.517(a) (192.505(a); 192.505(b); 192.505(c);
 192.505(d); 192.505(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

2. Strength Test Duration Requirements for SMYS < 30% (detail) *Do records indicate that pressure testing is conducted in accordance with 192.507? (DC.PT.LOWPRESS.PRESSTESTLOWSTRESS.R) (detail)*

192.517(a) (192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed

3. Strength Test Requirements for Operations < 100 psig (detail) *Do records indicate that pressure testing is conducted in accordance with 192.509(a)? (DC.PT.LOWPRESS.PRESSTEST100PSIG.R) (detail)*

192.517(a) (192.509(a); 192.509(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed

4. Test Requirements for Plastic Pipe (detail) *Do records indicate that pressure testing is conducted in accordance with 192.513? (DC.PT.PRESSTESTPLASTIC.R) (detail)*

192.517(a) (192.513(a); 192.513(b); 192.513(c);
 192.513(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed

5. Normal Maintenance and Operations (detail) *Has the operator conducted annual reviews of the written procedures in the manual as required? (MO.GO.OMANNUALREVIEW.R) (detail)*

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

6. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.R) (detail)*

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

7. Normal Operations and Maintenance Procedures - Review (detail) *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.R) (detail)*

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed

8. Abnormal Operations (Review) (detail) Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation procedures and corrective action taken where deficiencies are found? (MO.GOABNORMAL.ABNORMALREVIEW.R) (detail)

192.605(a) (192.605(c)(4))	Sat+	Sat	Concern	Unsat	NA	NC

Notes: Records reviewed

9. Damage Prevention Program (detail) Does the damage prevention program meet minimum requirements specified in 192.614(c)? (PD.OC.PDPROGRAM.R) (detail)

192.614(c)	Sat+	Sat	Concern	Unsat	NA	NC
				X		

Notes: Records indicate non-compliance in responding to locate requests. More explanation in Summary and Probable Violations included in this report.

10. Change in Class Location Required Study (detail) Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? (MO.GOCLASS.CLASSLOCATESTUDY.R) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection.

11. Emergency Response Performance (detail) Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVTREVIEW.R) (detail)

192.605(a) (192.615(b)(1); 192.615(b)(3))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed

12. Emergency Response Training (detail) Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures? (EP.ERG.TRAINING.R) (detail)

192.605(a) (192.615(b)(2))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

13. Liaison with Public Officials (detail) Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures? (EP.ERG.LIAISON.R) (detail)

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

14. Incident Investigation (detail) Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures? (EP.ERG.INCIDENTANALYSIS.R) (detail)

192.605(a) (192.617)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

15. General - Testing Requirements (detail) Do records indicate that pressure testing is conducted in accordance with 192.503? (DC.PT.PRESSTEST.R) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

16. Audience Identification Records (detail) Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages? (PD.PA.AUDIENCEID.R) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

17. Educational Provisions (detail) Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event? (PD.PA.EDUCATE.R) (detail)

192.616(d) (192.616(f))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

18. Maximum Allowable Operating pressure (detail) Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required? (MO.GOMAOP.MAOPDETERMINE.R) (detail)

192.709 (192.619; 192.621; 192.623)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

19. Messages on Pipeline Facility Locations (detail) Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations? (PD.PA.LOCATIONMESSAGE.R) (detail)

192.616(e) (192.616(f))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

20. Odorization of Gas (detail) Do records indicate appropriate odorization of its combustible gases in accordance with its procedures and conduct of the required testing to verify odorant levels met requirements? (MO.GOODOR.ODORIZE.R) (detail)

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

21. Baseline Message Delivery Frequency (detail) *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?* (PD.PA.MESSAGEFREQUENCY.R) (detail)

192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records Reviewed.

22. Patrolling Requirements (detail) *Do records indicate that ROW surface conditions have been patrolled as required?* (PD.RW.PATROL.R) (detail)

192.709(c) (192.705(a); 192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

23. Liaison with Emergency and Other Public Officials (detail) *Have liaisons been established and maintained with appropriate fire, police, and other public officials?* (PD.PA.LIAISON.R) (detail)

192.616(c) (API RP 1162 Section 4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

24. Leakage Surveys (detail) *Do records indicate leakage surveys conducted as required?* (PD.RW.LEAKAGE.R) (detail)

192.709(c) (192.706; 192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records Reviewed.

25. Other Languages (detail) *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?* (PD.PA.LANGUAGE.R) (detail)

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Census data did not meet the threshold for supplying materials in other non-english languages.

26. Distribution Leakage Surveys (detail) *Do records indicate distribution leakage surveys were conducted as required?* (PD.RW.DISTLEAKAGE.R) (detail)

192.603(b) (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed. First main was in Business District requiring annual surveys. Other 2 outside of BD (3yr)

Used this record review to inspect OQ personnel records.

Main #445703 surveyed '16 by KP; '17 by RL;'18 by ML. Each meet required survey date. All personnel OQ current.

Main #261271 surveyed '17 by ML;--previous '14 survey; verified OQ current

Main #346463 surveyed '17 by SW--previous '14 survey; verified OQ current

27. Test Reinstated Service Lines (detail) *From the review of records, did the operator properly test disconnected service lines? (AR.RMP.TESTREINSTATE.R) (detail)*

192.603(b) (192.725(a), 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Work orders reviewed. Used this record review to inspect OQ personnel records.
5012 Lively Ct. Louisville 100psi/10 minutes by HS; verified OQ current
1207 N. 3rd Street Bardstown 100 psi/10 minutes by CB; verified OQ current
4139 Bardstown Rd Louisville 100psi/10 minutes by JL; verified OQ current

28. Evaluate Program Implementation (detail) *Has an audit or review of the operator's program implementation been performed annually since the program was developed? (PD.PA.EVALIMPL.R) (detail)*

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

29. Acceptable Methods for Program Implementation Audits (detail) *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation? (PD.PA.AUDITMETHODS.R) (detail)*

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

30. Abandonment or Deactivation of Pipeline and Facilities (detail) *Do records indicate pipelines were abandoned or deactivated as required? (MO.GM.ABANDONPIPE.R) (detail)*

192.709(c) (192.727(a); 192.727(b); 192.727(c);
 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed

31. Program Changes and Improvements (detail) *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)? (PD.PA.PROGRAMIMPROVE.R) (detail)*

192.616(c) (API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

32. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals? (MO.GMOPP.PRESSREGTEST.R) (detail)*

192.709(c) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: The Westport Road and Bardstown Road station records were reviewed. Inspections of facilities for '16, '17 and '18 confirmed compliance with inspection dates and testing performed. Records for LG&E staff conducting the inspections confirmed OQ compliance at the time of the inspection.

33. Evaluating Program Effectiveness (detail) *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?* (PD.PA.EVALEFFECTIVENESS.R) (detail)

192.616(c) (API RP 1162 Section 8.4)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

34. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity?* (MO.GMOPP.PRESSREGCAP.R) (detail)

192.709(c) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

35. Measure Program Outreach (detail) *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?* (PD.PA.MEASUREOUTREACH.R) (detail)

192.616(c) (API RP 1162 Section 8.4.1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

36. Valve Maintenance Transmission Lines (detail) *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?* (MO.GM.VALVEINSPECT.R) (detail)

192.709(c) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: Records to be reviewed during 2019 Transmission inspection.

37. Measure Understandability of Message Content (detail) *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?* (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)

192.616(c) (API RP 1162 Section 8.4.2)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

38. Valve Maintenance Distribution Lines (detail) *Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?* (MO.GM.DISTVALVEINSPECT.R) (detail)

192.603(b) (192.747)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Critical valves designated as 129:11; 42:10; and 13:02 records were reviewed. Records indicated compliance with inspection dates for years 2016, 2017, and 2018. OQ records for Tech KT were reviewed and in compliance.

39. Vault Inspection (detail) *Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment?* (FS.FG.VAULTINSPECTFAC.R) (detail)

192.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No vaults meeting the required capacity for inspection.

40. Measure Desired Stakeholder Behavior (detail) *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?* (PD.PA.MEASUREBEHAVIOR.R) (detail)

192.616(c) (API RP 1162 Section 8.4.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

41. Prevention of Accidental Ignition (detail) *Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?* (MO.GM.IGNITION.R) (detail)

192.709 (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

42. Measure Bottom-Line Results (detail) *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?* (PD.PA.MEASUREBOTTOM.R) (detail)

192.616(c) (API RP 1162 Section 8.4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

43. Bell and Spigot Joints (detail) *Do records indicate that caulked bell and spigot joints were correctly sealed?* (MO.GM.BELLSPIGOTJOINT.R) (detail)

192.603(b) (192.753(a); 192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No known cast in system.

44. Program Changes (detail) *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?* (PD.PA.CHANGES.R) (detail)

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

45. Master Meter and Petroleum Gas Systems (detail) *Do records indicate the master meter or petroleum gas system operator has met the requirements of 192.616(j)?* (PD.PA.MSTRMETER.R) (detail)

192.616(j) (192.616(h); API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Records - Operator Qualification

1. Qualification Records for Personnel Performing Covered Tasks (detail) Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)

192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: As noted previously, records regarding OQ compliance were reviewed during various inspection areas and all were found to be current and in compliance with the company's OQ Plan.

2. Contractor and Other Entity Qualification (detail) Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Yes, contractor records were reviewed and in compliance with the company's OQ Plan.

Records - Corrosion Control Performance

1. Corrosion Control Records (detail) Do records indicate the location of all items listed in 192.491(a)? (TD.CP.RECORDS.R) (detail)

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

2. Examination of Exposed Portions of Buried Pipe (detail) Do records adequately document that exposed buried piping was examined for corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.R) (detail)

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

3. Cathodic Protection Monitoring (detail) Do records adequately document cathodic protection monitoring tests have occurred as required? (TD.CPMONITOR.TEST.R) (detail)

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: 2016, 2017, and 2018 records of monitoring were reviewed at the following locations and found to be in compliance. Also OQ records of AG, DL, and ND (Techs conducting the monitoring) were reviewed and found to be in compliance.

1099966, Glenview Ave., Harwood Road, Woodmont Drive, 10395114, 10186235, Commander Drive, and Herb Lane.

4. Rectifier or other Impressed Current Sources (detail) Do records document details of electrical checks of sources of rectifiers or other impressed current sources? (TD.CP.MONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC

Notes: Remote reads are conducted on some rectifier locations and these records were reviewed. Also, the following rectifier records were reviewed and found to be in compliance along with the Tech's OQ records conducting the checks:
20171261 @ English Station City Gate DL
20171304 @ Salt River LW
20171028 @ St Andrew's Church Road LW

5. Bonds, Diodes and Reverse Current Switches (detail) Do records document details of electrical checks interference bonds, diodes, and reverse current switches? (TD.CP.MONITOR.REVCURRENTTEST.R) (detail)

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed. Campground and Sandusky area checked by AG. OQ was in compliance.

6. Correction of Corrosion Control Deficiencies (detail) Do records adequately document actions taken to correct any identified deficiencies in corrosion control? (TD.CP.MONITOR.DEFICIENCY.R) (detail)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed record (10999966) of a remediated isolation at various meter sets which indicated repairs made to correct low readings and indicating CP reading returning back into normal ranges.

7. Unprotected Buried Pipelines (typically bare pipelines) (detail) Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

8. Isolation from Other Metallic Structures (detail) Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.R) (detail)

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

9. Test Leads Installation (detail) Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (TD.CP.MONITOR.TESTLEAD.R) (detail)

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed records of the installation of anodes or test station replacement or addition which indicated compliance with company's procedures.

10. Interference Currents (detail) Do records document that the operator has minimized the detrimental effects of stray currents when found? (TD.CPMONITOR.INTFRCURRENT.R) (detail)

192.491(c) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed indicated a bond was installed at 3395 to address an interference with Tennessee Gas pipeline.

11. Internal Corrosion (detail) Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Monitoring occurs at take stations prior to distribution system.

12. Internal Corrosion in Cutout Pipe (detail) Do records document examination of removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.R) (detail)

192.491(c) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

13. Internal Corrosion Control: Design and Construction (192.476) (detail) Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476? (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be reviewed during 2019 Transmission inspection.

14. Internal Corrosion Corrosive Gas Actions (detail) Do records document the actions taken when corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.R) (detail)

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

15. Atmospheric Corrosion Monitoring (detail) Do records document inspection of aboveground pipe for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.R) (detail)

192.491(c) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

16. New Buried Pipe Coating (detail) Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? (TD.COAT.NEWPIPE.R) (detail)

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

17. Repair of Internally Corroded Pipe (detail) *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall? (TD.ICP.REPAIR.R) (detail)*

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes

18. Evaluation of Internally Corroded Pipe (detail) *Do records document adequate evaluation of internally corroded pipe? (TD.ICP.EVALUATE.R) (detail)*

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service? (FS.CS.CMPMAINT.P) (detail)*

192.605(b)(6)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No Compressor stations on company's distribution.

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices? (FS.CS.CMPSUSD.P) (detail)*

192.605(b)(5) (192.605(b)(7))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks? (FS.CSSYSROT.CMPRELIEF.P) (detail)*

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.P) (detail)*

192.303 (192.735(a); 192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

5. Compressor Station Design/Construction - Permanent Gas Detection (detail)

Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings? (FS.CSSYSROT.CMPGASDETREQ.P) (detail)

192.605(b) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward? (FS.CS.BLDGEXITS.O) (detail)

192.163(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

2. Compressor Station Design/Construction - Fence Gates (detail) Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied? (FS.CS.FENCEGATES.O) (detail)

192.163(d)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

3. Compressor Station Design/Construction - NFPA 70 (detail) Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station? (FS.CS.CMPNFPA70.O) (detail)

192.163(e)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

4. Compressor stations Liquid Removal (detail) Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165? (DC.DPCCMP.CMPLIQPROT.O) (detail)

192.141 (192.165(a); 192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard? (FS.CSSYSROT.ESDGASDISCH.O) (detail)

192.167(a)(2)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

6. Compressor Station Design/Construction - ESD Gas Block (detail) Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less. (FS.CSSYSROT.ESDGASBLK.O) (detail)

192.167(a)(1)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

7. Compressor Station Design/Construction - ESD (detail) Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings? (FS.CSSYSROT.ESDGASSD.O) (detail)

192.167(a)(3)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

8. Compressor Station Design/Construction - ESD Electrical (detail) Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings? (FS.CSSYSROT.ESDELECSO.O) (detail)

192.167(a)(3)(i) (192.167(a)(3)(ii))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

9. Compressor Station Design/Construction - ESD Locations (detail) Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station? (FS.CSSYSROT.ESDLOCATION.O) (detail)

192.167(a)(4)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages? (FS.CSSYSROT.ESDDISTSD.O) (detail)

192.167(b)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

11. Compressor Station Design/Construction - Unattended Platform ESD (detail) Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform. (FS.CSSYSROT.UNATTPLATCMPSD.O) (detail)

192.167(c)(1)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

12. Compressor Station Design/Construction - Fire Protection (detail) Do compressor stations have adequate fire protection facilities? (FS.CSSYSROT.CMPFP.O) (detail)

192.171(a)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

13. Compressor Station Design/Construction - Over-Speed Protection (detail) Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven? (FS.CSSYSROT.CMPOVSPD.O) (detail)

192.171(b)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

14. Compressor Station Design/Construction - Lubrication (detail) Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication? (FS.CSSYSROT.CMPLUBPROT.O) (detail)

192.171(c)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented? (FS.CSSYSROT.CMPGASENGSD.O) (detail)

192.171(d)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler? (FS.CSSYSROT.CMPGASENGMFL.O) (detail)

192.171(e)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

17. Compressor Station Design/Construction - Ventilation (detail) Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas? (FS.CS.CMPBLDGVENT.O) (detail)

192.173	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

18. Cathodic Protection of Underground Piping (detail) Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.O) (detail)

192.457(b)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

19. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected?* (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?* (DC.MO.MAOPLIMIT.O) (detail)

192.605(b)(5)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

21. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.O) (detail)

192.605(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site?* (FS.CS.CMPERP.O) (detail)

192.605(a) (192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619?* (MO.GOMAOP.MAOPRECORDING.O) (detail)

192.605(b)(1) (192.619(a); 192.619(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

24. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?* (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

25. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (FS.CSSYSROT.CMPRELIEF.O) (detail)

192.199 (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)? (DC.COOMP.CMPCOMBUSTIBLE.O) (detail)

192.735(a) (192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

28. Compressor Station Gas Detection (detail) Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings? (FS.CSSYSROT.CMPGASDET.O) (detail)

192.736(a) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval? (FS.CSSYSROT.CMPRELIEF.R) (detail)

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required? (FS.CSSYSROT.CMPGASDETO.M.R) (detail)

192.709(c) (192.736(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

PHMSA Form 14 Question Set (IA Equivalent)
 PHMSA (OQ) INSPECTION FORM

Instructions (See staff report on D&A in separate inspection report # 3667 conducted on 3/25/2019)

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	Louisville Gas & Electric Company	Op ID #	11824
Inspector	David Nash	Unit #	
Date of Inspection	3/25/2019		
Inspection Location City & State	Louisville, KY		
Operator Employee Interviewed	Tanya D. Levine	Phone #	502-627-3150
Position/Title			
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)	Tanya D. Levine		
DER Phone #	502-627-3150		

§199		Yes	No	Does Not Know
.3, .101 .201, .245	1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?	X		
Comments				
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.	X		
Comments				
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.	X		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?	X		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.	X		
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* (TQ.OQ.OQPLAN.P) (detail)

192.805(a) (192.801(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section A

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task?* (TQ.OQ.REEVALINTERVAL.P) (detail)

192.805(g)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-15

3. Contractors Adhering to OQ Plan (detail) *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan?* (TQ.OQ.OQPLANCONTRACTOR.P) (detail)

192.805(b) (192.805(f); 192.805(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Scope page 6 and Appendix I

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified?* (TQ.OQ.OQCONTRACTOR.P) (detail)

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Scope page 6 and Appendix I

6. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section J page 27 and Appendix I Records reviewed.

7. Management of Other Entities Performing Covered Tasks (detail) *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task?* (TQ.OQ.OTHERENTITY.R) (detail)

192.805(b) (192.805(c); 192.803)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix K pages 116-117. Records reviewed.

8. Evaluation Methods (detail) *Are evaluation methods established and documented appropriate to each covered task?* (TQ.OQ.EVALMETHOD.P) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-15

9. Evaluation Methods (detail) *Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records?* (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section J page 27 Records reviewed.

10. Abnormal Operating Conditions (detail) Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)

192.803	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section A pages 10-12

11. Abnormal Operating Conditions (detail) Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-16. Records reviewed.

12. Qualification Records for Personnel Performing Covered Tasks (detail) Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)

192.807	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section J page 27. Records reviewed

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition? (TQ.OQ.MERGERACQ.P) (detail)

192.805(b) (192.803)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix K pages 116-117, Appendix A, and I

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.P) (detail)

192.805(h)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B

16. Covered Task Performed by Non-Qualified Individual (detail) Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities? (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section C page 16

17. Personnel Performance Monitoring (detail) Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks? (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section C page 16

19. Program Performance and Improvement (detail) Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program? (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix I

21. Management of Changes (detail) Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)? (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Appendix I pages 97-108

22. Notification of Significant Plan Changes (detail) Does the process require significant OQ program changes to be identified and the Administrator or State agency notified? (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Appendix I

PHMSA Form 15 Question Set (IA Equivalent)
 PHMSA (OQ) INSPECTION FORM

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes:

2. Qualification Status (detail) *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

3. Abnormal Operating Condition Recognition and Reaction (detail) *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

4. Verification of Qualification (detail) *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

5. Program Inspection Deficiencies (detail) *Have potential issues identified by the headquarters inspection process been corrected at the operational level?* (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

***PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0***

Distribution Integrity Management Program Implementation Inspection Form

This inspection form is for the evaluation of an operator's implementation of its gas distribution integrity management program (DIMP) through a review of its records and actions performed on pipeline facilities. This inspection form is applicable to operators, other than Master Meter and Small LPG operators, that have developed and implemented a DIMP under §192.1005. The form asks inspectors to review records and perform field observations regarding the implementation of the DIMP required elements. Following a review of the operator's DIMP plan, inspectors will observe actions taken by the operator to ensure that procedures have been followed. There are instances when actions by an operator could be deemed satisfactory by an inspector for an implementation question while still not meeting the procedural requirements in the DIMP plan resulting in an unsatisfactory rating for a corresponding procedural question.

Questions with code references beside them are enforceable. "S/Y" stands for "satisfactory" or "yes"; "U/N" stands for "unsatisfactory" or "no"; "N/A" stands for "not applicable"; and "N/C" stands for "not checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section. Due to the unique characteristics of some operator's system, there are instances where an operator is not required to perform an action, and some of the questions requesting a review of documents may not apply and would be rated as "N/A" (rather than rating "U/N"). For instance, in Question #8, if the operator has NOT acquired any new information relevant to threat identification, rate as "N/A". Correspondingly, if the operator had acquired new information that needed to be included in the threat identification and had not, then the rating would be "U/N".

This inspection form includes two types of activities – records review and field observation activities:

- The Records Review questions are to be performed on records used by an operator for implementing its DIMP plan. Not all parts of this form may be applicable to a specific Records Review Inspection, and only those applicable portions of this form need to be completed.
- The Field Observation questions are to be used on field activities being performed by an operator in support of its DIMP plan. Field Observation inspection activities may also include review of data, environmental conditions, and assumptions being used by an operator in support of its DIMP plan. Not all parts of this form may be applicable to a specific Field Observation Inspection, and only those applicable portions of this form need to be completed.

A review of applicable Operations and Maintenance (O&M) and DIMP processes and procedures applicable to the field activity being inspected should be considered by the inspector to ensure the operator is implementing its O&M Manuals and DIMP in a consistent manner.

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):	Louisville Gas & Electric Company
PHMSA Operator ID:	11824
Type of Operator:	<input checked="" type="checkbox"/> Investor Owned <input type="checkbox"/> Municipal <input type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (Identify - e.g., cooperative)
State(s) included in this inspection	Kentucky
Headquarters Address:	220 West Main Street, P>O> Box 32010
Company Contact:	Joe Ryan
Phone Number:	502-376-5944
Email:	Joe.Ryan@lge-ku
Date(s) of Inspection	4/03/2019
Date of this Report	5/13/2019
Date of Current DIMP Plan/Revision	December 31, 2018

Persons Interviewed:

Persons Interviewed (list primary contact first)	Title	Phone Number	Email
Joe Ryan	Manager, Gas Distribution Integrity and Compliance	502-376-5944	Joe.Ryan@lge-ku.com

State/Federal Representatives:

Inspector Name and Agency	Phone Number	Email
Michael Nantz	502-782-2602	Michael.Nantz@ky.gov

System Description Narrative:

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
			192.1005 Issues Identified in previous Integrity Management Inspection(s)			
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
			192.1007(a) Knowledge of the system			
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: <ul style="list-style-type: none"> • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) <ul style="list-style-type: none"> • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
10	.1007 (b)	Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following: <ul style="list-style-type: none"> • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(d)	Identify and implement measures to address risks				
18	.1007 (d)	Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19	.1007 (d)	Has the operator completed any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat? (e.g., pipe replacement program completed, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: <u>Locate</u> the leaks in the distribution system; <u>Evaluate</u> the actual or potential hazards associated with these leaks; <u>Act</u> appropriately to mitigate these hazards; <u>Keep</u> records; and <u>Self-assess</u> to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(e)	Measure performance, monitor results, and evaluate effectiveness				
23	.1007 (e)	Is the operator collecting data for the required performance measures in §192.1007(e)? i) Number of hazardous leaks either eliminated or repaired, categorized by cause? ii) Number of excavation damages? iii) Number of excavation tickets? iv) Total number of leaks either eliminated or repaired, categorized by cause? v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	Periodic Evaluation and Improvement				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: <ul style="list-style-type: none"> • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
31	.1007 (f)	Did the periodic evaluation indicate that the selected <u>performance measures</u> are assessing the effectiveness of risk reduction measures? If not, were performance measures modified, deleted or added? (describe in Inspector comments)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1007 (g)	Report results				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1009	What must an operator report when mechanical fittings fail?				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
35	.1009	Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15 th of the next calendar year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
36	.1009	<p>Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
		192.1011	What records must an operator keep?			
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
		192.1013	When may an operator deviate from required periodic inspections under this part?			
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	.1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
44	.1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

Additional Inspector Comments:

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SUPPLEMENTAL INSPECTION QUESTIONS		S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS					
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.				x	
	If necessary, was remedial action taken?				
Review operator procedures for surveillance of cast iron pipelines				x	
	Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)				
Review operator emergency response procedures for leaks caused by excavation damage near buildings.		x			
	Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)	x			
Review operator records of previous accidents and failures (including reported third party damage and leak response) to ensure appropriate operator response as required by 192.617.		x			
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS					
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?		x			
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?			x		
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?		Yes			
	If no, encourage and promote the adoption of CGA Best Practices document.				
Review operators records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617.		x			
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS					
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?		No			
	If yes, what is operator doing to mitigate the safety concerns? Any issues addressed though DIMP				
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?					x
Comments:					

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CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
 807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?

Yes	No	NA	NC
X			

Notes

2. Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.

Yes	No	NA	NC
X			

Notes

3. Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.

Yes	No	NA	NC
X			

Notes: IT Security initially engaged consultant along with other like utilities Best Practices to develop program.

4. Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?

Yes	No	NA	NC
X			

Notes: Plan last updated 1/01/2019.

5. Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.

Yes	No	NA	NC
	X		

Notes

6. Identify personnel with specific responsibilities for cybersecurity within your organization?

Yes	No	NA	NC
X			

Notes: Bruce Mannery, director of IT

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Louisville Gas and Electric Gas Dig-In Incidents						
Demand for Penalty Assessments	Status	Total Issued	Total Open	Total Completed	% Complete	
2018 Louisville Gas and Electric Gas Dig-in Incidents	Complete	57	0	57	100%	
2019 Louisville Gas and Electric Gas Dig-in Incidents	Complete	59	0	59	100%	
2020 Louisville Gas and Electric Gas Dig-in Incidents	Complete	48	0	48	100%	
2021 Louisville Gas and Electric Gas Dig-in Incidents	In Progress	20	7	13	65%	

2018 Louisville Gas and Electric Gas Dig-in Incidents

Incident Number	Incident Date	Incident Year	Incident Report Submitted to KPSC Date	Demand for Penalty Assessment Letter Dated	Demand for Penalty Assessment Letter Date Received	Date Check Submitted to KPSC	Penalty Amount	Check No.	Status	Notes
1	20787	7/16/2018	2018	8/8/2018	9/6/2018	9/10/2018	\$2,000	1019358896	Complete	Letter stated this was the 2nd offense
2	20818	7/18/2018	2018	8/17/2018	8/31/2018	9/4/2018	\$250	1019356975	Complete	Letter stated this was the 1st offense; \$1,000 will be suspended upon completion of remedial measure; Remedial measure requires LG&E to attend training at KPSC on 11/5/18.
3	20825	7/20/2018	2018	8/17/2018	9/7/2018	10/1/2018	\$4,000	1019358850	Complete	
4	20834	7/23/2018	2018	8/21/2018	9/10/2018	9/14/2018	\$4,000	1019359942	Complete	
5	20836	7/23/2018	2018	8/22/2018	9/10/2018	9/14/2018	\$4,000	1019358851	Complete	
6	20839	7/24/2018	2018	8/23/2018	9/24/2018	10/1/2018	\$4,000	1019362129	Complete	Letter stated this was the 8th offense
7	20845	7/25/2018	2018	8/24/2018	9/24/2018	9/26/2018	\$4,000	1019359943	Complete	Letter stated this was the 6th offense
8	20847	7/25/2018	2018	8/24/2018	9/24/2018	9/27/2018	\$4,000	1019359944	Complete	Letter stated this was the 7th offense
9	20876	8/2/2018	2018	8/31/2018	10/8/2018	10/9/2018	\$4,000	1019362130	Complete	
10	20878	8/3/2018	2018	8/31/2018	10/12/2018	10/18/2018	\$4,000	449436	Complete	
11	20879	8/3/2018	2018	8/31/2018	10/17/2018	10/22/2018	\$4,000	449462	Complete	
12	20880	8/7/2018	2018	9/4/2018	11/7/2018	11/12/2018	\$4,000	450134	Complete	
13	20897	8/9/2018	2018	9/7/2018	10/25/2018	10/29/2018	\$4,000	449461	Complete	
14	20900	8/11/2018	2018	9/10/2018	11/14/2018	11/16/2018	\$4,000	450449	Complete	
15	20910	8/13/2018	2018	9/12/2018	12/20/2018	12/20/2018	\$4,000	451658	Complete	
16	20912	8/14/2018	2018	9/12/2018	11/28/2018	11/30/2018	\$4,000	450778	Complete	
17	20919	8/13/2018	2018	9/12/2018	11/7/2018	11/12/2018	\$4,000	450133	Complete	
18	20930	8/14/2018	2018	9/13/2018	11/16/2018	11/21/2018	\$4,000	450471	Complete	
19	20950	8/20/2018	2018	9/18/2018	11/27/2018	11/30/2018	\$4,000	450777	Complete	
20	20956	8/21/2018	2018	9/19/2018	12/3/2018	12/6/2018	\$4,000	451124	Complete	
21	20957	8/22/2018	2018	9/20/2018	12/20/2018	1/2/2019	\$4,000	452006	Complete	
22	20959	8/23/2018	2018	9/20/2018	12/27/2018	1/14/2019	\$4,000	452577	Complete	
23	20961	8/23/2018	2018	9/21/2018	1/3/2019	1/7/2019	\$4,000	452115	Complete	
24	20962	8/24/2018	2018	9/21/2018	1/9/2019	1/14/2019	\$4,000	452579	Complete	
25	20966	8/25/2018	2018	9/21/2018	4/18/2019	4/22/2019	\$4,000	455713	Complete	
26	20967	8/27/2018	2018	9/21/2018	2/28/2019	3/4/2019	\$4,000	454173	Complete	
27	20983	8/28/2018	2018	9/26/2018	2/22/2019	2/27/2019	\$4,000	453933	Complete	
28	21031	9/10/2018	2018	10/9/2018	4/11/2019	4/17/2019	\$4,000	455663	Complete	
29	21032	9/11/2018	2018	10/9/2018	4/15/2019	4/18/2019	\$4,000	455644	Complete	
30	21041	9/12/2018	2018	10/11/2018	4/19/2019	4/22/2019	\$4,000	455714	Complete	
31	21043	9/13/2018	2018	10/11/2018	4/23/2019	4/25/2019	\$4,000	455952	Complete	
32	21044	9/14/2018	2018	10/11/2018	5/9/2019	5/13/2019	\$4,000	456401	Complete	
33	21045	9/15/2018	2018	10/11/2018	4/23/2019	4/25/2019	\$4,000	455953	Complete	
34	21065	9/20/2018	2018	10/19/2018	5/7/2019	5/10/2019	\$4,000	456402	Complete	
35	21077	9/26/2018	2018	10/26/2018	5/3/2019	5/3/2019	\$4,000	456212	Complete	
36	21078	9/27/2018	2018	10/26/2018	5/8/2019	5/10/2019	\$4,000	456400	Complete	
37	21109	10/3/2018	2018	10/31/2018	5/15/2019	5/17/2019	\$4,000	456424	Complete	
38	21128	10/9/2018	2018	11/7/2018	4/11/2019	4/17/2019	\$4,000	455664	Complete	
39	21135	10/10/2018	2018	11/9/2018	4/11/2019	4/17/2019	\$4,000	455643	Complete	
40	21141	10/15/2018	2018	11/13/2018	6/4/2019	6/6/2019	\$4,000	457147	Complete	
41	21145	10/17/2018	2018	11/16/2018	4/11/2019	4/17/2019	\$4,000	455665	Complete	
42	21148	10/18/2018	2018	11/16/2018	4/11/2019	4/17/2019	\$4,000	455666	Complete	
43	21160	10/25/2018	2018	11/20/2018	4/11/2019	4/17/2019	\$4,000	455667	Complete	
44	21203	11/7/2018	2018	12/6/2018	4/11/2019	4/17/2019	\$4,000	455660	Complete	
45	21226	11/16/2018	2018	12/14/2018	4/11/2019	4/17/2019	\$4,000	455659	Complete	
46	21236	11/19/2018	2018	12/18/2018	6/19/2019	6/24/2019	\$4,000	459215	Complete	
47	21237	11/21/2018	2018	12/18/2018	7/1/2019	7/8/2019	\$4,000	459410	Complete	
48	21247	11/26/2018	2018	12/21/2018	7/5/2019	7/11/2019	\$4,000	459573	Complete	
49	21258	11/29/2018	2018	12/29/2018	4/11/2019	4/17/2019	\$4,000	455658	Complete	
50	21260	11/30/2018	2018	12/29/2018	4/11/2019	4/17/2019	\$4,000	455657	Complete	
51	21262	12/3/2018	2018	1/3/2019	4/12/2019	4/17/2019	\$4,000	455647	Complete	
52	21273	12/7/2018	2018	1/4/2019	4/11/2019	4/17/2019	\$4,000	455656	Complete	
53	31276	12/10/2018	2018	1/8/2019	4/11/2019	4/17/2019	\$4,000	455655	Complete	
54	31279	12/12/2018	2018	1/11/2019	7/16/2019	7/24/2019	\$4,000	459778	Complete	
55	31280	12/13/2018	2018	1/11/2019	6/17/2019	6/21/2019	\$4,000	459216	Complete	
56	31288	12/19/2018	2018	1/16/2019	4/12/2019	4/17/2019	\$4,000	455646	Complete	
57	31305	12/20/2018	2018	1/31/2019	4/12/2019	4/17/2019	\$4,000	455645	Complete	
ANNUAL TOTAL							\$222,250			

To mitigate risk of Demand Penalty Letters being lost in the mail, beginning July 9, 2020 Demand Penalty Letters will be provided via email with a hard copy to follow from the KPSC.

2019 Louisville Gas and Electric Gas Dig-in Incidents

Incident Number	Incident Date	Incident Year	Incident Report Submitted to KPSC Date	Demand for Penalty Assessment Letter Dated	Demand for Penalty Assessment Letter Date Received	Date Check Submitted to KPSC	Penalty Amount	Check No.	Status	Notes
58	31347	1/29/2019	2019	2/27/2019	4/11/2019	4/17/2019	\$4,000	455653	Complete	
59	31352	2/4/2019	2019	3/4/2019	4/11/2019	4/17/2019	\$4,000	455652	Complete	
60	31360	2/13/2019	2019	3/7/2019	4/11/2019	4/17/2019	\$4,000	455651	Complete	

To mitigate risk of Demand Penalty Letters being lost in the mail, beginning July 9, 2020 Demand Penalty Letters will be provided via email with a hard copy to follow from the KPSC.

61	31400	2/25/2019	2019	3/21/2019	4/11/2019	4/17/2019	5/10/2019	\$4,000	455650	Complete	
62	31401	2/25/2019	2019	3/21/2019	8/7/2019	8/16/2019	9/6/2019	\$4,000	462793	Complete	
63	31424	2/26/2019	2019	3/27/2019	4/11/2019	4/17/2019	5/10/2019	\$4,000	455649	Complete	
64	31432	3/4/2019	2019	4/2/2019	4/11/2019	4/17/2019	5/10/2019	\$4,000	455648	Complete	
65	31434	3/6/2019	2019	4/2/2019	8/21/2019	8/26/2019	9/20/2019	\$4,000	463318	Complete	
66	31459	3/12/2019	2019	4/10/2019	7/11/2019	7/18/2019	8/9/2019	\$4,000	459751	Complete	
67	31473	3/19/2019	2019	4/17/2019	6/17/2019	6/21/2019	7/17/2019	\$4,000	458966	Complete	
68	31487	3/27/2019	2019	4/22/2019	9/19/2019	10/3/2019	10/18/2019	\$4,000	464742	Complete	
69	31497	4/3/2019	2019	4/22/2019	9/24/2019	10/7/2019	10/24/2019	\$4,000	464931	Complete	
70	31498	4/3/2019	2019	4/22/2019	10/23/2019	10/25/2019	NA	\$0	NA	Complete	Letter of Warning - No Fine
71	31502	4/4/2019	2019	4/23/2019	10/8/2019	10/10/2019	11/7/2019	\$4,000	464965	Complete	
72	31513	4/9/2019	2019	4/24/2019	6/19/2019	6/27/2019	7/19/2019	\$4,000	459052	Complete	
73	31545	4/12/2019	2019	5/8/2019	10/22/2019	10/28/2019	11/21/2019	\$4,000	465727	Complete	
74	31546	4/15/2019	2019	5/8/2019	10/22/2019	10/25/2019	11/21/2019	\$4,000	465726	Complete	
75	31577	4/24/2019	2019	5/21/2019	11/15/2019	11/18/2019	12/13/2019	\$4,000	467346	Complete	
76	31580	4/26/2019	2019	5/21/2019	11/19/2019	11/21/2019	12/19/2019	\$4,000	467344	Complete	
77	31583	4/29/2019	2019	5/21/2019	10/16/2019	10/24/2019	11/15/2019	\$4,000	465728	Complete	
78	31596	4/29/2019	2019	5/24/2019	11/27/2019	12/10/2019	12/27/2019	\$4,000	467373	Complete	
79	31599	5/1/2019	2019	5/24/2019	8/30/2019	9/13/2019	9/30/2019	\$4,000	464147	Complete	
80	31602	5/6/2019	2019	5/24/2019	12/13/2019	12/23/2019	1/10/2020	\$4,000	468194	Complete	
81	31673	5/21/2019	2019	6/17/2019	1/3/2020	1/3/2020	1/31/2020	\$4,000	468488	Complete	
82	31719	6/6/2019	2019	7/1/2019	2/10/2020	2/14/2020	3/11/2020	\$4,000	469383	Complete	
	31731	6/10/2019	2019	7/9/2019	Original Ltr: 1/22/2020 New Ltr: 3/3/2020	Original letter not received New Ltr: 3/3/2020 via email		\$4,000	470058	Complete	Received notice on 3/3/2020 that according to Commission records we are 30 days past due on Demand For Penalty Assessment for Incident Number 31731. State Regulation and Rates did not receive this letter and has requested that Mike Jones inform the KPSC staff that we did not receive this letter and request a new letter be sent. So that we may begin the check disbursement process, the Demand For Penalty Assessment letter received via email from the KPSC staff was provided to legal for processing. An updated letter with a new date was received on 3/3/2020 via email.
83											
84	31776	6/27/2019	2019	7/19/2019	2/19/2020	2/21/2020	3/20/2020	\$4,000	469756	Complete	
85	31846	7/15/2019	2019	8/6/2019	3/26/2020	3/30/2020	4/22/2020	\$4,000	470743	Complete	
86	31871	7/17/2019	2019	8/13/2019	3/27/2020	3/30/2020	4/22/2020	\$4,000	470719	Complete	
87	31877	7/23/2019	2019	8/13/2019	3/23/2020	3/25/2020	4/22/2020	\$4,000	470719	Complete	
88	31941	7/31/2019	2019	8/28/2019	4/6/2021	4/13/2021	5/6/2021	\$4,000	482704	Complete	
89	31942	8/1/2019	2019	8/28/2019	11/27/2019	12/10/2019	12/27/2019	\$4,000	467372	Complete	
90	31944	8/1/2019	2019	8/28/2019	4/9/2020	4/14/2020	5/8/2020	\$4,000	471195	Complete	
91	31946	8/2/2019	2019	8/28/2019	4/9/2020	4/14/2020	5/8/2020	\$4,000	471196	Complete	
92	31967	8/9/2019	2019	9/5/2019	11/13/2019	11/18/2019	12/13/2019	\$4,000	467345	Complete	
93	31990	8/16/2019	2019	9/11/2019	4/30/2020	5/4/2020	5/29/2020	\$4,000	471904	Complete	
94	31995	8/19/2019	2019	9/11/2019	5/7/2020	5/4/2020	5/29/2020	\$4,000	471903	Complete	The demand letter is dated 3 days after its receipt date. The penalty check will be submitted on 5/29 assuming the date on the letter should have been 4/30 as the others received that day.
95	32014	8/23/2019	2019	9/19/2019	4/30/2020	5/4/2020	5/29/2020	\$4,000	471901	Complete	
96	32100	9/9/2019	2019	10/8/2020	*5/22/2020	*7/7/2020	7/24/2020	\$4,000	473992 475257	Complete	Received notice on 7/7/2020 that according to Commission records we are 30 days past due on Demand For Penalty Assessment for Incident. State Regulation and Rates did not receive this letter and has requested that Mike Jones inform the KPSC. Payment will be issued with the other 7/24/2020 penalty payments. ***The original payment that was sent by overnight carrier on July 23, 2020 was lost by the carrier, thus requiring LG&E to cancel the prior issued check and reprocess the payment.
97	32102	9/10/2019	2019	10/8/2019	5/28/2020	6/4/2020	6/26/2020	\$4,000	472893	Complete	
98	32107	9/10/2019	2019	10/8/2019	5/28/2020	6/4/2020	6/26/2020	\$4,000	472892	Complete	
99	32115	9/11/2019	2019	10/9/2019	*5/28/2020	*7/7/2020	7/24/2020	\$4,000	473991 475256	Complete	Received notice on 7/7/2020 that according to Commission records we are 30 days past due on Demand For Penalty Assessment for Incident. State Regulation and Rates did not receive this letter and has requested that Mike Jones inform the KPSC. Payment will be issued with the other 7/24/2020 penalty payments. ***The original payment that was sent by overnight carrier on July 23, 2020 was lost by the carrier, thus requiring LG&E to cancel the prior issued check and reprocess the payment.
100	32138	9/24/2019	2019	10/17/2019	6/18/2020	6/23/2020	7/17/2020	\$4,000	473237	Complete	
101	32162	9/30/2019	2019	10/24/2019	*6/11/2020	*8/14/2020	9/2/2020	\$4,000	475255	Complete	Received notice on 8/14/2020 according to Commission records that this penalty is 30 days past due SR&R records indicate the notice was not received. Payment will be issued with the next round of penalty payments on 9/2/2020.
102	32169	10/8/2019	2019	10/24/2019	6/24/2020	7/6/2020	7/24/2020	\$4,000	473990 475254	Complete	***The original payment that was sent by overnight carrier on July 23, 2020 was lost by the carrier, thus requiring LG&E to cancel the prior issued check and reprocess the payment.
103	32210	10/15/2019	2019	11/12/2019	12/20/2019	12/27/2019	1/17/2020	\$4,000	468193	Complete	
104	32212	10/16/2019	2019	11/12/2019	7/2/2020	7/6/2020	7/31/2020	\$4,000	473987	Complete	
105	32217	10/16/2019	2019	11/12/2019	7/2/2020	7/6/2020	7/31/2020	\$4,000	473988	Complete	
106	32222	10/21/2019	2019	11/12/2019	7/9/2020	7/9/2020	8/7/2020	\$4,000	474166	Complete	*1st Demand letter received via email from the KPSC. Going forward, the established practice is that notices will be received via email with a hard copy to follow.
107	32223	10/22/2019	2019	11/12/2019	7/9/2020	7/9/2020	8/7/2020	\$4,000	474165	Complete	
108	32224	10/23/2019	2019	11/12/2019	7/22/2020	7/22/2020	8/21/2020	\$4,000	474400	Complete	
109	32225	10/23/2019	2019	11/12/2019	7/13/2020	7/13/2020	8/12/2020	\$4,000	474186	Complete	
110	32226	10/24/2020	2020	11/12/2020	8/6/2020	8/11/2020	9/4/2020	\$4,000	475059	Complete	
111	32227	10/28/2019	2019	11/12/2019	7/27/2020	7/28/2020	8/26/2020	\$4,000	474606	Complete	
112	32318	11/18/2019	2019	12/13/2019	8/18/2020	8/18/2020	9/16/2020	\$4,000	475250	Complete	
113	32319	11/18/2019	2019	12/13/2019	8/17/2020	8/18/2020	9/16/2020	\$4,000	475253	Complete	
114	32320	11/20/2019	2019	12/13/2019	8/19/2020	8/19/2020	9/18/2020	\$4,000	475251	Complete	

115	32337	12/11/2019	2019	12/18/2019	12/20/2019	12/26/2019	1/17/2020	\$4,000	468191	Complete	
116	32360	12/11/2019	2019	1/9/2020	9/14/2020	9/21/2020	10/14/2020	\$4,000	476378	Complete	
ANNUAL TOTAL								\$232,000			

2020 Louisville Gas and Electric Gas Dig-in Incidents

Incident Number	Incident Date	Incident Year	Incident Report Submitted to KPSC Date	Demand for Penalty Assessment Letter Dated	Demand for Penalty Assessment Letter Date Received	Date Check Submitted to KPSC	Penalty Amount	Check No.	Status	Notes	
117	32401	1/7/2020	2020	2/4/2020	10/1/2020	10/2/2020	10/30/2020	\$4,000	476831	Complete	
118	32404	1/15/2020	2020	2/4/2020	10/5/2020	10/13/2020	11/4/2020	\$4,000	477055	Complete	
119	32429	1/24/2020	2020	2/18/2020	10/14/2020	10/14/2020	11/13/2020	\$4,000	477201	Complete	
120	32441	1/31/2020	2020	2/19/2020	11/16/2020	11/17/2020	12/16/2020	\$4,000	478138	Complete	
121	32459	2/12/2020	2020	3/5/2020	10/15/2020	10/15/2020	11/13/2020	\$4,000	477202	Complete	
122	32487	2/25/2020	2020	3/23/2020	10/29/2020	11/2/2020	11/25/2020	\$4,000	477703	Complete	*Will need to submit to the KPSC on 11/25 as they are closed on the 27th for Thanksgiving
123	32527	3/11/2020	2020	4/8/2020	12/14/2020	12/18/2020	1/13/2021	\$4,000	479341	Complete	
124	32579	4/2/2020	2020	4/30/2020	4/30/2020	5/4/2020	5/29/2020	\$4,000	471902	Complete	
125	32581	4/6/2020	2020	4/30/2020	12/14/2020	12/18/2020	1/13/2021	\$4,000	479430	Complete	
126	32595	4/7/2020	2020	5/5/2020	12/14/2020	12/18/2020	1/13/2021	\$4,000	479339	Complete	
127	32597	4/8/2020	2020	5/5/2020	1/11/2021	1/9/2021	2/10/2021	\$4,000	480235	Complete	
128	32599	4/8/2020	2020	5/5/2020	5/7/2020	5/14/2020	6/5/2020	\$4,000	472229	Complete	
129	32629	4/25/2020	2020	5/20/2020	1/19/2020	1/15/2021	2/18/2020	\$4,000	480315	Complete	
130	32641	5/4/2020	2020	5/27/2020	1/15/2021	1/15/2021	2/12/2021	\$4,000	480262	Complete	
131	32649	5/4/2020	2020	6/1/2020	1/15/2021	1/15/2021	2/12/2021	\$4,000	480259	Complete	
132	32667	5/11/2020	2020	6/8/2020	6/11/2020	5/16/2020	7/10/2020	\$4,000	473050	Complete	
133	32707	5/28/2020	2020	6/17/2020	6/18/2020	6/22/2020	7/17/2020	\$4,000	473238	Complete	
134	32746	6/9/2020	2020	6/30/2020	7/1/2020	7/6/2020	7/31/2020	\$4,000	473989	Complete	
135	42776	6/16/2020	2020	7/10/2020	7/13/2020	7/13/2020	8/12/2020	\$4,000	474187	Complete	
136	42789	6/24/2020	2020	7/14/2020	7/30/2020	7/30/2020	8/28/2020	\$4,000	474855	Complete	
137	42791	6/25/2020	2020	7/14/2020	7/15/2020	7/15/2020	8/14/2020	\$4,000	474354	Complete	
138	42847	7/2/2020	2020	7/30/2020	3/23/2021	3/24/2021	4/22/2021	\$4,000	482087	Complete	
139	42852	7/8/2020	2020	8/3/2020	8/3/2020	8/4/2020	9/2/2020	\$4,000	474880	Complete	
140	42890	7/17/2020	2020	8/12/2020	8/12/2020	8/12/2020	9/11/2020	\$4,000	475058	Complete	
141	42906	7/21/2020	2020	8/17/2020	8/17/2020	8/18/2020	9/16/2020	\$4,000	475252	Complete	
142	42924	7/22/2020	2020	8/20/2020	8/20/2020	8/20/2020	9/18/2020	\$4,000	475460	Complete	
143	42940	7/30/2020	2020	8/25/2020	8/26/2020	8/27/2020	9/25/2020	\$4,000	475640	Complete	
144	42956	8/6/2020	2020	9/1/2020	6/1/2021	6/1/2021	7/1/2021	\$4,000	484019	Complete	
145	42964	8/12/2020	2020	9/4/2020	6/28/2021	7/1/2021	7/28/2021	\$4,000	485528	Complete	
146	42979	8/15/2020	2020	9/10/2020	7/13/2021	7/14/2021	8/12/2021	\$4,000	485976	Complete	
147	42981	8/17/2020	2020	8/17/2020	7/13/2021	7/14/2021	8/12/2021	\$4,000	485975	Complete	
148	43004	8/21/2020	2020	9/17/2020	10/22/2020	10/22/2020	11/20/2020	\$4,000	477394	Complete	
149	43020	8/25/2020	2020	9/23/2020	9/23/2020	9/29/2020	10/23/2020	\$4,000	480260	Complete	
150	43068	9/9/2020	2020	10/7/2020	10/12/2020	10/19/2020	11/10/2020	\$4,000	477223	Complete	*Will need to submit to the KPSC on 11/10 as they are closed on the 11th for Veterans Day
151	43076	9/10/2020	2020	10/9/2020	10/12/2020	10/19/2020	11/10/2020	\$4,000	477222	Complete	*Will need to submit to the KPSC on 11/10 as they are closed on the 11th for Veterans Day
152	43081	9/16/2020	2020	10/9/2020	8/31/2021	9/8/2021	9/30/2021	\$4,000	488012	Complete	
153	43082	9/17/2020	2020	10/9/2020	10/12/2020	10/19/2020	11/10/2020	\$4,000	477220	Complete	*Will need to submit to the KPSC on 11/10 as they are closed on the 11th for Veterans Day
154	43083	9/17/2020	2020	10/9/2020	10/12/2020	10/19/2020	11/10/2020	\$4,000	477221	Complete	*Will need to submit to the KPSC on 11/10 as they are closed on the 11th for Veterans Day
155	43133	10/1/2020	2020	10/28/2020	10/28/2020	10/28/2020	11/25/2020	\$4,000	477415	Complete	*Will need to submit to the KPSC on 11/25 as they are closed on the 27th for Thanksgiving
156	43137	10/4/2020	2020	10/28/2020	10/28/2020	10/28/2020	11/25/2020	\$4,000	477416	Complete	*Will need to submit to the KPSC on 11/25 as they are closed on the 27th for Thanksgiving
157	43242	11/2/2020	2020	11/30/2020	1/25/2021	1/26/2021	2/24/2021	\$4,000	480484	Complete	
158	43323	12/10/2020	2020	1/8/2021	1/11/2021	1/15/2021	2/10/2021	\$4,000	480261	Complete	
159	43269	11/14/2020	2020	12/10/2020	12/14/2020	12/18/2020	1/13/2021	\$4,000	479338	Complete	
160	43290	11/27/2020	2020	12/16/2020	12/21/2020	12/18/2020	1/20/2021	\$4,000	479336	Complete	
161	43292	12/3/2020	2020	12/16/2020	12/21/2020	12/18/2020	1/20/2021	\$4,000	479337	Complete	
162	43331	12/18/2020	2020	1/13/2021	1/19/2021	1/15/2021	2/18/2021	\$4,000	480314	Complete	
163	43354	12/29/2020	2020	1/25/2021	1/25/2021	2/12/2021	2/24/2021	\$4,000	481019	Complete	
164	43355	12/29/2020	2020	1/25/2021	1/25/2021	2/12/2021	2/24/2021	\$4,000	481020	Complete	
ANNUAL TOTAL								\$192,000			

To mitigate risk of Demand Penalty Letters being lost in the mail, beginning July 9, 2020 Demand Penalty Letters will be provided via email with a hard copy to follow from the KPSC.

2021 Louisville Gas and Electric Gas Dig-in Incidents

Incident Number	Incident Date	Incident Year	Incident Report Submitted to KPSC Date	Demand for Penalty Assessment Letter Dated	Demand for Penalty Assessment Letter Date Received	Date Check Submitted to KPSC	Penalty Amount	Check No.	Status	Notes	
164	43387	1/12/2021	2021	2/8/2021	2/8/2021	2/9/2021	3/10/2021	\$4,000	480873	Complete	
165	43463	3/1/2021	2021	3/29/2021	4/6/2021	4/13/2021	5/6/2021	\$4,000	482703	Complete	
166	43472	3/10/2021	2021	3/29/2021	4/6/2021	4/13/2021	5/6/2021	\$4,000	482705	Complete	
167	53608	4/23/2021	2021	5/21/2021	5/25/2021	5/25/2021	6/24/2021	\$4,000	483847	Complete	
168	53616	4/27/2021	2021	5/25/2021	6/1/2021	6/1/2021	7/1/2021	\$4,000	484020	Complete	
169	53664	5/11/2021	2021	6/8/2021	6/15/2021	6/10/2021	7/15/2021	\$4,000	484426	Complete	
170	53677	5/13/2021	2021	6/10/2021	6/15/2021	6/15/2021	7/15/2021	\$4,000	484445	Complete	
171	53688	5/24/2021	2021	6/15/2021	6/22/2021	6/21/2021	7/22/2021	\$4,000	484619	Complete	
172	53777	6/17/2021	2021	7/13/2021	7/27/2021	7/27/2021	8/26/2021	\$4,000	486193	Complete	
173	53794	6/23/2021	2021	7/20/2021	7/27/2021	7/27/2021	8/26/2021	\$4,000	486194	Complete	

To mitigate risk of Demand Penalty Letters being lost in the mail, beginning July 9, 2020 Demand Penalty Letters will be provided via email with a hard copy to follow from the KPSC.

174	53798	6/28/2021	2021	7/20/2021	7/27/2021	7/27/2021	8/26/2021	\$4,000	486192	Complete	
175	53573	4/14/2021	2021	5/5/2021	8/24/2021	8/24/2021	9/23/2021	\$4,000	487236	Complete	
176	53841	7/7/2021	2021	8/3/2021	9/28/2021	9/28/2021	10/28/2021	\$4,000			
177	53869	7/15/2021	2021	8/9/2021	9/28/2021	9/28/2021	10/28/2021	\$4,000			
178	53906	7/27/2021	2021	8/16/2021	10/12/2021	10/12/2021	11/11/2021	\$4,000			
179	53932	7/28/2021	2021	8/23/2021	10/12/2021	10/12/2021	11/11/2021	\$4,000			
180	53957	8/3/2021	2021	8/31/2021	9/7/2021	9/8/2021	10/7/2021	\$4,000	488011	Complete	
181	53993	7/28/2021	2021	8/23/2021	10/12/2021	10/12/2021	11/11/2021	\$4,000			
182	54000	8/18/2021	2021	9/15/2021	9/28/2021	9/28/2021	10/28/2021	\$4,000			
183	54025	8/26/2021	2021	9/22/2021	9/28/2021	9/28/2021	10/28/2021	\$4,000			

ANNUAL TOTAL 80,000

TOTAL PAID \$726,250

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to Acadia Center's First Set of Data Requests

Issued on October 1, 2021

Acadia 1-10

Request:

National Grid hosts the System Reliability Procurement Technical Working Group on a monthly basis as a forum for in-depth discussion of targeted alternative solutions to traditional infrastructure investments. Will PPL commit to continuing to host this collaborative effort to develop future System Reliability Procurement reports? Please provide any plans for ongoing SRP report development that have been created by PPL and Narragansett.

Response:

PPL and PPL RI refer to their responses to data requests OER 1-7, OER 1-10, and OER 1-18. PPL RI's planned approach will be to follow the National Grid System Reliability Procurement ("SRP") plan, guidelines, and criteria as outlined in the Rhode Island Public Utilities Commission filing in Docket No. 5080 for the 2021-2023 SRP Three-Year Plan.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to Acadia Center's First Set of Data Requests
Issued on October 1, 2021

Acadia 1-11

Request:

Does PPL operate gas or electric demand response programs in other jurisdictions? What demand response program offerings does PPL plan to offer in Rhode Island.

Response:

PPL and PPL RI refer to their responses to data requests Division 2-14 (Attachment PPL-DIV 2-14-5), Division 3-24, OER 1-1, OER 1-3, AG 1-27, GECA 1-2, and GECA 1-3.

Acadia 1-12

Request:

Does PPL offer Time of Use or Time Varying Rates in any jurisdiction? What plans if any does PPL have to offer TOU or TVR in Rhode Island?

Response:

Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities ("KU") offer residential customers the choice of a flat or time-of-day energy tariffed rate. The time-of-day rate allows a customer to receive a lower rate in the off-peak time periods when the system demands are less. This time-of-day rate is also offered to customers who take service under LG&E and KU's General Service tariff so long as the service is in connection to the customer's residence to account for adjacent structures such as detached garages or barns. Please see Attachment PPL-Acadia 1-12-1 and Attachment PPL-Acadia 1-12-2 for copies of these tariffs.

PPL Electric Utilities Corporation ("PPL Electric") currently offers time varying rates in Pennsylvania. PPL Electric offers a Time-of-Use ("TOU") Program providing for the voluntary participation of eligible existing and new residential and small commercial & industrial customers in a year-round TOU Program. The objective of this TOU Program is to provide eligible residential and small commercial & industrial customers with an opportunity to shift energy usage away from the on-peak periods, when wholesale electricity demand and prices are high, to off-peak periods, when demands and prices are lower. Please see Attachment PPL-Acadia 1-12-3 for the PPL Electric tariff.

PPL and PPL RI also refer to their response to data request OER 1-21.

Louisville Gas and Electric Company

P.S.C. Electric No. 13, First Revision of Original Sheet No. 5
Canceling P.S.C. Electric No. 13, Original Sheet No. 5

Standard Rate

RS
Residential Service

APPLICABLE

In all territory served.

AVAILABILITY

Available for single-phase secondary delivery to single family residential service subject to the terms and conditions on Sheet No. 100 of this Tariff.

RATE

Basic Service Charge per day:	\$0.45			
Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	R/R
	\$0.06917	\$0.03165	\$0.10082	

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

ADJUSTMENT CLAUSES

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Economic Relief Surcredit	Sheet No. 89
Environmental Cost Recovery Surcharge	Sheet No. 87
Home Energy Assistance Program	Sheet No. 92
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

MINIMUM CHARGE

The Basic Service Charge shall be the minimum charge.

DUE DATE OF BILL

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

DATE OF ISSUE: August 17, 2021

DATE EFFECTIVE: With Bills Rendered
On and After August 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Louisville, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2021-00056 dated August 2, 2021

Louisville Gas and Electric Company

P.S.C. Electric No. 13, Original Sheet No. 5.1

Standard Rate

**RS
Residential Service**

LATE PAYMENT CHARGE

If full payment is not received by the due date of the bill, a 3% late payment charge will be assessed on the current month's charges. T
T

Residential Customers who receive a pledge for or notice of low income energy assistance from an authorized agency will not be assessed or required to pay a late payment charge for the bill for which the pledge or notice is received, nor will they be assessed or required to pay a late payment charge in any of the eleven (11) months following receipt of such pledge or notice. T
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Residential Service Customers in good standing by not having been assessed a Late Payment Charge for the previous eleven (11) months will automatically have one (1) late payment charge waived. This provision is only available once every 12 months as long as the Customer remains in good standing. T
T
T/N
N/D

TERMS AND CONDITIONS

Service will be furnished under Company's Terms and Conditions applicable hereto. T
T

DATE OF ISSUE: July 20, 2021

DATE EFFECTIVE: With Bills Rendered
On and After July 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Louisville, Kentucky

**Issued by Authority of an Order of the
Public Service Commission in Case No.
2020-00350 dated June 30, 2021**

Louisville Gas and Electric Company

P.S.C. Electric No. 13, First Revision of Original Sheet No. 6
 Canceling P.S.C. Electric No. 13, Original Sheet No. 6

Standard Rate

RTOD-Energy
 Residential Time-of-Day Energy Service

APPLICABLE

In the territory served.

AVAILABILITY

Available as an option to Customers otherwise served under Rate RS.

1. Service under this rate schedule is limited to a maximum of five hundred (500) Customers taking service on Rates RTOD-Energy and RTOD-Demand combined that are eligible for Rate RS. Company will accept Customers on a first-come-first-served basis.
2. This service is also available to Customers on Rate GS (where the Rate GS service is used in conjunction with a Rate RS service to provide service to a detached garage and energy usage is no more than 300 kWh per month) who demonstrate power delivered to such detached garage is consumed, in part, for the powering of low emission vehicles licensed for operation on public streets or highways. Such vehicles include:
 - a) battery electric vehicles or plug-in hybrid electric vehicles recharged through a charging outlet at Customer's premises,
 - b) natural gas vehicles refueled through an electric-powered refueling appliance at Customer's premises.
3. A Customer electing to take service under this rate schedule who subsequently elects to take service under Rate RS may not be allowed to return to this optional rate for twelve (12) months from the date of exiting this rate schedule.

RATE

Basic Service Charge per day:	\$0.45			
Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
Off-Peak Hours:	\$0.04882	\$0.03165	\$0.08047	R/R
On-Peak Hours:	\$0.14545	\$0.03165	\$0.17710	R/R

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

DATE OF ISSUE: August 17, 2021

DATE EFFECTIVE: With Bills Rendered
 On and After August 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Louisville, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2021-00056 dated August 2, 2021**

Louisville Gas and Electric Company

P.S.C. Electric No. 13, Original Sheet No. 6.1

Standard Rate

**RTOD-Energy
 Residential Time-of-Day Energy Service**

ADJUSTMENT CLAUSES

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following: T
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 T

Demand Side Management Cost Recovery Mechanism	Sheet No. 86	T
Fuel Adjustment Clause	Sheet No. 85	T
Off-System Sales Adjustment Clause	Sheet No. 88	T
Economic Relief Surcredit	Sheet No. 89	N
Environmental Cost Recovery Surcharge	Sheet No. 87	T
Home Energy Assistance Program	Sheet No. 92	T
Franchise Fee	Sheet No. 90	T
School Tax	Sheet No. 91	T

RATING PERIODS

The rating periods are established in Eastern Standard Time year-round by season for weekdays and weekends throughout Company's service territory, and shall be as follows:

Summer Months of April through October

	<u>Off-Peak</u>	<u>On-Peak</u>
Weekdays	5 PM - 1 PM	1 PM - 5 PM
Weekends	All Hours	

All Other Months of November continuously through March

	<u>Off-Peak</u>	<u>On-Peak</u>
Weekdays	10 AM - 6 PM and 10 PM – 6 AM	6 AM - 10 AM and 6 PM – 10 PM T
Weekends	All Hours	

If a legal holiday falls on a weekday, it will be considered a weekday.

MINIMUM CHARGE

The Basic Service Charge shall be the Minimum Charge.

DUE DATE OF BILL

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill. T

DATE OF ISSUE: July 20, 2021

DATE EFFECTIVE: With Service Rendered
 On and After July 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Louisville, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2020-00350 dated June 30, 2021**

Louisville Gas and Electric Company

P.S.C. Electric No. 13, Original Sheet No. 6.2

Standard Rate

**RTOD-Energy
 Residential Time-of-Day Energy Service**

LATE PAYMENT CHARGE

If full payment is not received by the due date of the bill, a 3% late payment charge will be assessed on the current month's charges. T
T

RTOD-Energy Customers who receive a pledge for or notice of low income energy assistance from an authorized agency will not be assessed or required to pay a late payment charge for the bill for which the pledge or notice is received, nor will they be assessed or required to pay a late payment charge in any of the eleven (11) months following receipt of such pledge or notice. N
N
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N

RTOD-Energy Customers in good standing by not having been assessed a Late Payment Charge for the previous eleven (11) months will automatically have one (1) late payment charge waived. T
T
This provision is only available once every 12 months as long as the Customer remains in good standing. N
N/D

TERMS AND CONDITIONS

Service will be furnished under Company's Terms and Conditions applicable hereto. Customers served under this optional residential rate will not be eligible for Company's Budget Payment Plan. T
T
Company shall install metering equipment capable of accommodating the Time of Use rate described herein. T
T

DATE OF ISSUE: July 20, 2021

DATE EFFECTIVE: With Service Rendered
 On and After July 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Louisville, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2020-00350 dated June 30, 2021**

Kentucky Utilities Company

P.S.C. No. 20, First Revision to Original Sheet No. 5
Canceling P.S.C. No. 20, Original Sheet No. 5

Standard Rate

RS

Residential Service

APPLICABLE

In all territory served.

AVAILABILITY

Available for single-phase secondary delivery to single family residential service subject to the terms and conditions on Sheet No. 100 of this Tariff. Three-phase service under this rate schedule is restricted to those Customers being billed on this rate schedule as of July 1, 2004.

RATE

Basic Service Charge per day: \$0.53

Plus an Energy Charge per kWh:	Infrastructure	Variable	Total
	\$0.06527	\$0.03143	\$0.09670

R/R

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

ADJUSTMENT CLAUSES

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86
Fuel Adjustment Clause	Sheet No. 85
Off-System Sales Adjustment Clause	Sheet No. 88
Economic Relief Surcredit	Sheet No. 89
Environmental Cost Recovery Surcharge	Sheet No. 87
Home Energy Assistance Program	Sheet No. 92
Franchise Fee	Sheet No. 90
School Tax	Sheet No. 91

MINIMUM CHARGE

The Basic Service Charge shall be the minimum charge.

DUE DATE OF BILL

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

DATE OF ISSUE: August 17, 2021

DATE EFFECTIVE: With Service Rendered
On and After August 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2021-00055 dated August 2, 2021

Kentucky Utilities Company

P.S.C. No. 20, Original Sheet No. 5.1

Standard Rate

RS
Residential Service

LATE PAYMENT CHARGE

If full payment is not received by the due date of the bill, a 3% late payment charge will be assessed on the current month's charges.

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Residential Customers who receive a pledge for or notice of low income energy assistance from an authorized agency will not be assessed or required to pay a late payment charge for the bill for which the pledge or notice is received, nor will they be assessed or required to pay a late payment charge in any of the eleven (11) months following receipt of such pledge or notice.

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Residential Service Customers in good standing by not having been assessed a Late Payment Charge for the previous eleven (11) months will automatically have one (1) late payment charge waived. This provision is only available once every 12 months as long as the Customer remains in good standing.

T
T
T/N
N/D

TERMS AND CONDITIONS

Service will be furnished under Company's Terms and Conditions applicable hereto.

T
T

DATE OF ISSUE: July 20, 2021

DATE EFFECTIVE: With Service Rendered
On and After July 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

**Issued by Authority of an Order of the
Public Service Commission in Case No.
2020-00349 dated June 30, 2021**

Kentucky Utilities Company

P.S.C. No. 20, First Revision of Original Sheet No. 6
 Canceling P.S.C. No. 20, Original Sheet No. 6

Standard Rate **RTOD-Energy**
Residential Time-of-Day Energy Service

APPLICABLE

In the territory served.

AVAILABILITY

Available as an option to Customers otherwise served under Rate RS.

1. Service under this rate schedule is limited to a maximum of five hundred (500) Customers taking service on Rates RTOD-Energy and RTOD-Demand combined that are eligible for Rate RS. Company will accept Customers on a first-come-first-served basis.
2. This service is also available to Customers on Rate GS (where the Rate GS service is used in conjunction with a Rate RS service to provide service to a detached garage and energy usage is no more than 300 kWh per month) who demonstrate power delivered to such detached garage is consumed, in part, for the powering of low emission vehicles licensed for operation on public streets or highways. Such vehicles include:
 - a) battery electric vehicles or plug-in hybrid electric vehicles recharged through a charging outlet at Customer's premises,
 - b) natural gas vehicles refueled through an electric-powered refueling appliance at Customer's premises.
3. A Customer electing to take service under this rate schedule who subsequently elects to take service under Rate RS may not be allowed to return to this optional rate for twelve (12) months from the date of exiting this rate schedule.

RATE

Basic Service Charge per day:	\$0.53			
Plus an Energy Charge per kWh:	Infrastructure	Variable	Total	
Off-Peak Hours:	\$0.03227	\$0.03143	\$0.06370	R/R
On-Peak Hours:	\$0.18441	\$0.03143	\$0.21584	R/R

"Variable" shall be the rate comprised of costs, such as fuel, that fluctuate with the production of energy used by customers.

"Infrastructure" shall be the rate comprised of costs associated with meeting system demand that do not fluctuate directly with energy usage as well as the portion of fixed customer-related expenses not recovered in the Basic Service Charge.

DATE OF ISSUE: August 17, 2021

DATE EFFECTIVE: With Service Rendered
 On and After August 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Lexington, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2021-00055 dated August 2, 2021**

Kentucky Utilities Company

P.S.C. No. 20, Original Sheet No. 6.1

Standard Rate **RTOD-Energy**
Residential Time-of-Day Energy Service

ADJUSTMENT CLAUSES

The bill amount computed at the charges specified above shall be increased or decreased in accordance with the following:

Demand-Side Management Cost Recovery Mechanism	Sheet No. 86	T
Fuel Adjustment Clause	Sheet No. 85	T
Off-System Sales Adjustment Clause	Sheet No. 88	T
Economic Relief Surcredit	Sheet No. 89	N
Environmental Cost Recovery Surcharge	Sheet No. 87	T
Home Energy Assistance Program	Sheet No. 92	T
Franchise Fee	Sheet No. 90	T
School Tax	Sheet No. 91	T

RATING PERIODS

The rating periods are established in Eastern Standard Time year-round by season for weekdays and weekends throughout Company's service territory, and shall be as follows:

Summer Months of April through October

	<u>Off-Peak</u>	<u>On-Peak</u>
Weekdays	5 PM - 1 PM	1 PM - 5 PM
Weekends	All Hours	

All Other Months of November continuously through March

	<u>Off-Peak</u>	<u>On-Peak</u>
Weekdays	10 AM - 6 PM and 10 PM - 6 AM	6 AM - 10 AM and 6 PM - 10 PM
Weekends	All Hours	

If a legal holiday falls on a weekday, it will be considered a weekday.

MINIMUM CHARGE

The Basic Service Charge shall be the Minimum Charge.

DUE DATE OF BILL

Customer's payment will be due within sixteen (16) business days (no less than twenty-two (22) calendar days) from the date of the bill.

T

DATE OF ISSUE: July 20, 2021

DATE EFFECTIVE: With Service Rendered
 On and After July 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Lexington, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2020-00349 dated June 30, 2021**

Kentucky Utilities Company

P.S.C. No. 20, Original Sheet No. 6.2

Standard Rate

**RTOD-Energy
 Residential Time-of-Day Energy Service**

LATE PAYMENT CHARGE

If full payment is not received by the due date of the bill, a 3% late payment charge will be assessed on the current month's charges. T
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 T

RTOD-Energy Customers who receive a pledge for or notice of low income energy assistance from an authorized agency will not be assessed or required to pay a late payment charge for the bill for which the pledge or notice is received, nor will they be assessed or required to pay a late payment charge in any of the eleven (11) months following receipt of such pledge or notice. N
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 N

RTOD-Energy Customers in good standing by not having been assessed a Late Payment Charge for the previous eleven (11) months will automatically have one (1) late payment charge waived. T
 This provision is only available once every 12 months as long as the Customer remains in good standing. T
 N
 N/D

TERMS AND CONDITIONS

Service will be furnished under Company's Terms and Conditions applicable hereto. Customers served under this optional residential rate will not be eligible for Company's Budget Payment Plan. T
 Company shall install metering equipment capable of accommodating the Time-of-Use rate described herein. T
 T
 T

DATE OF ISSUE: July 20, 2021

DATE EFFECTIVE: With Service Rendered
 On and After July 1, 2021

ISSUED BY: /s/ Robert M. Conroy, Vice President
 State Regulation and Rates
 Lexington, Kentucky

**Issued by Authority of an Order of the
 Public Service Commission in Case No.
 2020-00349 dated June 30, 2021**

**PPL Electric Utilities
 Corporation**

Supplement No. 314
 Electric Pa. P.U.C. No. 201
 Seventeenth Revised Page No. 19Z.4
 Canceling Sixteenth Revised Page No. 19Z.4

GENERATION SUPPLY CHARGE-1

(C)

The Generation Supply Charge-1 (GSC-1) shall be applied to each kilowatt-hour supplied to residential customers who take Basic Utility Supply Service ("BUSS") from the Company under Rate Schedules RS and RTS (R), small commercial and industrial customers who take BUSS service under Rate Schedules GS-1, GS-3, BL, SA, SM (R), SHS, SLE, SE, TS (R) and GH-2 (R), and standby service for the foregoing rate schedules. The GSC-1 will not apply to those Rate Schedule GS-3 customers who have a peak demand of 100 kW or greater, but the GSC-1 will apply to those Rate Schedule LP-4 customers who have a peak demand of less than 100 kW. This peak demand will be based on the customer's ICAP peak load contribution to PJM peak load assigned for the most recent PJM Planning Year. The GSC-1 shall have the options listed below.

(C)

FIXED PRICE OPTION – RESIDENTIAL & SMALL COMMERCIAL/INDUSTRIAL

PURPOSE

The Fixed Price Option provides eligible customers in the Residential and Small Commercial & Industrial Customer Class with default electric service for those customers who have not selected a retail electric generation supplier (EGS) or the Time of Use Program.

PRICING PROVISIONS

The Fixed Price GSC-1, determined in accordance with the formula set forth below, shall be applied to all kilowatt-hours billed for service provided during the billing period:

$$\text{Fixed Price GSC-1} = \left[\left(\frac{GS_{fp}}{S_{fp}} \right) - \left(\frac{E}{S_{fp}} \right) \right] \times \frac{1}{(1-T)}$$

Where:

GSC-1 = The Generation Supply Charge-1, stated in cents per kilowatt hour, shall be calculated separately for each of the following two Customer Classes: (1) residential, and (2) small commercial and industrial as designated above.

GS_{fp} = The total estimated direct and indirect costs incurred by the Company to acquire generation supply from any source on behalf of participating BUSS customers on the Fixed Price Option in the applicable Customer Class. These costs shall be reduced by any revenue received by the Company from the sale of Alternative Energy Credits that otherwise would have expired.

The computation period shall be the six calendar months over which the Fixed Price GSC-1, as computed, will apply. Projections of the Company's costs to acquire generation supply, adjusted for losses and including Alternative Energy Credits, for the computation quarter shall include all direct and indirect costs of generation supply to be acquired by the Company from any source plus any associated generation supply-related procurement and administration costs. Any costs incurred prior to June 1, 2021, shall be amortized ratably over the 48-month period June 1, 2021, through May 31, 2025, and the 6-month amortization amount shall be included in the computation of the GSC-1.

(C)

(Continued)

(C) Indicates Change

Issued: April 30, 2021

Effective: June 1, 2021

**PPL Electric Utilities
 Corporation**

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 Electric Pa. P.U.C. No. 201
 Forty-First Revised Page No. 19Z.5
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GENERATION SUPPLY CHARGE – 1 (Continued) (C)

FIXED PRICE SERVICE – RESIDENTIAL & SMALL COMMERCIAL/INDUSTRIAL (Continued)

- E** = Experienced net over or undercollection of costs associated with the acquisition of generation supply for participating BUSS customers in the applicable Customer Class. These costs will be computed as stated in the GSC-1 RECONCILIATION PROVISIONS and will include applicable interest. Interest shall be computed monthly from the month the over or undercollection occurs to the month in which the overcollection is refunded or the undercollection is recouped. Interest on recoveries of overcollections and undercollections shall be calculated at the prime rate for commercial borrowing in effect on the last day of the month the over or undercollection occurred. **(C)**
- S_{fp}** = The Company's total retail KWH sales to participating BUSS customers on the Fixed Price Option in the applicable Customer Class, projected for the computation quarter.
- T** = The Pennsylvania gross receipts tax rate (exclusive of Part 2 of the State Tax Adjustment Surcharge (STAS) within this tariff) in effect during the billing month, expressed in decimal form.

Minimum bills shall not be reduced by reason of the GSC-1, nor shall GSC-1 charges be a part of the monthly rate schedule minimum. The GSC-1 shall not be subject to any credits or discounts and Part 2 of the STAS shall apply.

The following GSC-1 charges apply for the Fixed Price Option during the period June 1, 2021 through November 30, 2021. **(C)**

Customer Class	Small C&I	Residential
Rate Schedule / Charge	GS-1, GS-3 (< 100 kW), LP-4 (< 100 kW), BL, and GH-2 (R) \$0.04801/KWH (I)	RS and RTS (R) \$0.05087/KWH (I)

Small C&I – Street Lights										
Rate Schedule/ Charge	SA		SM (R)		SHS		SLE		SE	TS (R)
	Nominal Lumens	Charge	Nominal Lumens	\$/Lamp	Nominal Lumens	\$/Lamp	Nominal Lumens	\$/Fixture	\$/KWH	\$/Watt
	HPS 9,500	3.149 \$/Lamp	3,350	2.357	5,800	1.431	2,600	0.619	0.04801	0.03507
6,650			3.682	9,500	2.050	3,300	0.902			
10,500			5.147	16,000	3.015	3,800	0.912			
LED 4,300		0.740 \$/Fixture	20,000	8.152	25,500	5.440	4,900	1.246		
			34,000	13.899	50,000	8.536	7,500	1.590		
			51,000	19.209			15,000	2.967		
						20,000	4.601			

(Continued)

(D) Indicates Decrease **(I)** Indicates Increase **(C)** Indicates Change

PPL Electric Utilities Corporation

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Electric Pa. P.U.C. No. 201
Tenth Revised Page No.19Z.5A
Canceling Ninth Revised Page No.19Z.5A

GENERATION SUPPLY CHARGE -1 (Continued)

FIXED PRICE SERVICE – RESIDENTIAL & SMALL COMMERCIAL/INDUSTRIAL (Continued)

GSC – 1 RECONCILIATION PROVISIONS -

For the Fixed Price Option, the Company will file with the Commission thirty (30) days prior to each annual period (June 1 through May 31), a reconciliation of GSC-1 actual billed revenues and actual incurred costs for a twelve-month period ending March 31 of each year, pursuant to 66 Ps. C.S. §1307. The reconciliation shall become effective for service rendered during the 2 six-month computation periods. (C)

The reconciliation will be calculated separately for each of the two Customer Classes. The reconciliation will include a calculation of any over/under collection that will be reflected in the GSC-1 charges for the subsequent 2 six-month computation periods. The GSC-1 will be reconciled every twelve months, using over/under collection balance for the twelve-month period ending two months prior to each annual period. (C)

Application of the GSC-1 shall be subject to continuous review and audit by the Commission at intervals it shall determine. The Commission shall review the reasonableness and lawfulness of the level of charges produced by the GSC-1 and the costs included therein.

TIME OF USE PROGRAM – RESIDENTIAL AND SMALL COMMERCIAL/INDUSTRIAL (C)

PURPOSE

Beginning on June 1, 2019, this Time-of-Use (TOU) Program provides for the voluntary participation of eligible existing and new residential and small commercial & industrial customers in a year-round TOU Program. Eligible customers must meet the APPLICATION PROVISIONS of this TOU Program. The objective of this TOU Program is to provide eligible residential and small commercial & industrial customers with an opportunity to shift energy usage away from the on-peak periods, when wholesale electricity demand and prices are high, to off-peak periods, when demands and prices are lower.

(Continued)

**PPL Electric Utilities
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 Electric Pa. P.U.C. No. 201
 Fourteenth Revised Page No.19Z.5B
 Canceling Thirteenth Revised Page No.19Z.5B

GENERATION SUPPLY CHARGE – 1 (Continued)

TIME-OF-USE PROGRAM – RESIDENTIAL AND SMALL COMMERCIAL/INDUSTRIAL (C)
 (Continued)

PRICING PROVISIONS

The following Generation Supply Charges apply for service under the TOU Program during the period June 1, 2021 through November 30, 2021. On-Peak hours will be set based on schedule (C) below Monday through Friday, excluding weekends and holidays.

Rate Schedule RS and RTS (R)	Winter On-Peak Hours (4:00 PM to 8:00 PM) <u>December 1 to May 31</u>	Summer On-Peak Hours (2:00 PM to 6:00 PM) <u>June 1 to November 30</u>
On-Peak Hours	5.150 cts per kWh	7.190 cts per kWh (I)
Off Peak Hours	4.244 cts per kWh	4.583 cts per kWh (I)

Rate Schedules GS-1, GS-3 (< 100 kW), LP-4 (<100kW), BL, and GH-2 (R)	Winter On-Peak Hours (4:00 PM to 8:00 PM) <u>December 1 to May 31</u>	Summer On-Peak Hours (2:00 PM to 6:00 PM) <u>June 1 to November 30</u>
On-Peak Hours	4.988 cts per kWh	6.734 cts per kWh (I)
Off Peak Hours	4.140 cts per kWh	4.336 cts per kWh (I)

The TOU GSC-1, determined in accordance with the formula set forth below, shall be applied to all kilowatt-hours billed for BUSS service provided during the billing month:

$$\text{Summer On-Peak TOU GSC-1} = \left[\left[\frac{GS_{OFF}}{S} \times GS_M \right] + \left[\frac{GS_{IND} - E}{S} \right] \right] \times \frac{1}{(1-T)}$$

$$\text{Winter On-Peak TOU GSC-1} = \left[\left[\frac{GS_{OFF}}{S} \times GS_M \right] + \left[\frac{GS_{IND} - E}{S} \right] \right] \times \frac{1}{(1-T)}$$

(Continued)

(C) Indicates Change

**PPL Electric Utilities
 Corporation**

Supplement No. 314
 Electric Pa. P.U.C. No. 201
 Eighteenth Revised Page No.19Z.5C
 Canceling Seventeenth Revised Page No.19Z.5C

GENERATION SUPPLY CHARGE – 1 (Continued)

TIME-OF-USE PROGRAM – RESIDENTIAL AND SMALL COMMERCIAL/INDUSTRIAL **(C)**
 (Continued)

$$\text{Summer Off-Peak TOU GSC-1} = \left[\left[\frac{GS_{GEN}}{S} \times 0.90 \right] + \left[\frac{GS_{IND} - E}{S} \right] \right] \times \frac{1}{(1-T)}$$

$$\text{Winter Off-Peak TOU GSC-1} = \left[\left[\frac{GS_{GEN}}{S} \times 0.90 \right] + \left[\frac{GS_{IND} - E}{S} \right] \right] \times \frac{1}{(1-T)}$$

Where:

- GSC-1 = The Generation Supply Charge-1, stated in cents per kilowatt hour, shall be calculated separately for each of the following two Customer Classes: (1) residential, and (2) small commercial and industrial (taking service at secondary voltage levels) as designated above.
- GS_{GEN} = The total generation component for the respective customer classes' fixed price default service rate.
- GS_{OFF} = The total Off-Peak generation component for the respective customer classes' fixed price default service rate.
- GS_{IND} = The total estimated indirect costs incurred by the Company to acquire generation supply from any source on behalf of participating BUSS customers in the applicable Customer Class.
- E = Experienced net over or undercollection of costs associated with the acquisition of generation supply for participating BUSS customers in the applicable Customer Class. These costs will be computed as stated in the GSC – 1 RECONCILIATION PROVISIONS and will include applicable interest. Interest shall be computed monthly from the month the over or undercollection occurs to the month in which the overcollection is refunded or the undercollection is recouped. Interest on recoveries of overcollections and undercollections shall be calculated at the prime rate for commercial borrowing in effect on the last day of the month the over or undercollection occurred. **(C)**
- GS_M = Seasonal Multiplier based on historic data.
- S = The Company's total retail KWH sales to participating BUSS customers in the applicable Customer Class, projected for the computation period.
- T = The Pennsylvania gross receipts tax rate in effect during the billing month, expressed in decimal form.

(Continued)

(C) Indicates Change

PPL Electric Utilities Corporation

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Electric Pa. P.U.C. No. 201
Sixth Revised Page No.19Z.5D
Canceling Fifth Revised Page No.19Z.5D

GENERATION SUPPLY CHARGE – 1 (Continued)

TIME-OF-USE PROGRAM – RESIDENTIAL AND SMALL COMMERCIAL/INDUSTRIAL (C) (Continued)

APPLICATION PROVISIONS

This TOU Program is available to existing and new residential and small commercial/ industrial customers who are served, or qualify to be served, under Rate Schedules RS, RTS(R), GS-1, GS-3 (customers with peak demands less than 100 KW), LP-4 (customers with peak demands less than 100KW), BL and GH-2 (R). This includes Volunteer/Non-Profit organizations (Volunteer Fire Companies, Non-Profit Senior Citizen Centers, Non-Profit Rescue Squads, and Non-Profit Ambulance Services) served under Rate Schedules GS-1 and GS-3, but does not include customers in the Company's OnTrack program. Customers taking service under the above-referenced rate schedules, who also participate in the Company's Net Metering for Renewable Customer Generator programs, are eligible for the TOU Program. (C)

TERMINATING PARTICIPATION

A customer may leave this TOU Program after providing notice to the Company. The customer, if still receiving BUSS, will return to the standard Fixed Price GSC-1.

**PPL Electric Utilities
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First Revised Page No.19Z.5E
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**PPL Electric Utilities
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Acadia 1-13

Request:

Does PPL currently operate any programs that leverage customer battery storage systems to reduce peak grid demand? Please provide relevant documents.

Response:

Although PPL does not currently operate any programs that leverage customer battery storage systems to reduce peak grid demand, PPL does operate a utility-owned battery storage system in both Kentucky and Pennsylvania.

In Kentucky, PPL operates a 1 megawatt, 2 megawatt-hour lithium-ion battery storage system co-located with the E. W. Brown solar farm in Kentucky. PPL operates the battery around-the-clock, charging during the day when solar power is available and discharging at night. During daylight hours, the system can perform solar-support functions, including power smoothing. PPL also has also used this battery system to simulate reducing or limiting peak demand. Other advanced functions are Auto Volt-Var, during which the battery supplies or absorbs reactive power in order to maintain grid voltage at a reference value, and Auto Frequency Watt, in which the battery rapidly charges or discharges to reduce grid frequency variation.

PPL and PPL RI also refer to their response to data request Division 2-14(e) for information regarding PPL's operation of a battery storage system in Pennsylvania.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

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Responses to Acadia Center's First Set of Data Requests

Issued on October 1, 2021

Acadia 1-14

Request:

When does PPL plan to update and refile the Advanced Metering Functionality and Grid Modernization Plans submitted previously by National Grid in Dockets 5113 and 5114 respectively?

Response:

PPL and PPL RI have not yet determined when they plan to update and refile the Advanced Metering Functionality and Grid Modernization Plans submitted previously by National Grid in Dockets 5113 and 5114 respectively. Additionally, PPL and PPL RI refer to their responses to data requests Division 1-39, Division 2-46, Division 7-43, Division 7-52, Division 9-33, and OER 1-21.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
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Acadia 1-15

Request:

What is the minimum return on equity PPL must realize with regards to Rhode Island utility operations to remain an attractive business for shareholders? What minimum return on equity will PPL seek in the next utility rate case? Please provide any documents regarding this evaluation.

Response:

PPL and PPL RI have not yet evaluated the minimum return on equity PPL must realize with regards to Rhode Island utility operations to remain an attractive business for shareholders. PPL and PPL RI have also not yet determined what minimum return on equity they will seek in the next utility rate case, and PPL and PPL RI have not yet identified a target date to file the next base distribution rate case for The Narragansett Electric Company ("Narragansett") with the Rhode Island Public Utilities Commission (the "Commission"). PPL and PPL RI have not identified the target date because they plan to work in collaboration with the Rhode Island Division of Public Utilities and Carriers (the "Division") to determine best timing to file a base distribution rate case that will reflect the costs associated with PPL and PPL RI's ownership and operation of Narragansett after closing the Transaction. At the time PPL and PPL RI prepare and file Narragansett's next base distribution rate case, they will provide an evaluation of the market conditions and propose an appropriate return on equity based on those market conditions.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

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Issued on October 1, 2021

Acadia 1-16

Request:

Does PPL operate any programs to support the adoption of electric vehicles in other jurisdictions?
What research or plans has PPL conducted with regards to Rhode Island?

Response:

PPL and PPL RI refer to their responses to data requests OER 1-16, AG 1-26(b), AG 1-29 and
GECA 1-7.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

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Acadia 1-17

Request:

Does PPL support the Transportation and Climate Initiative Program? Please provide any relevant documents.

Response:

PPL supports electric vehicle adoption through programs that improve accessibility to charging infrastructure and connects customers with tools and information to make informed choices. See PPL and PPL RI's response to data request GECA 1-07.

Pennsylvania has not fully implemented the Transportation and Climate Initiative Program ("TCIP"), but PPL does monitor Pennsylvania legislation and efforts around TCIP. PPL and PPL RI are still in the process of evaluating how Rhode Island has implemented the TCIP.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

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Acadia 1-18

Request:

Does PPL offer any alternate electricity rate classes for electric vehicle charging or off-peak charging rates? Please provide any relevant documents.

Response:

LG&E, KU, and PPL Electric do not have any rate classes or tariffs specifically addressed solely to electric vehicle charging.

PPL and PPL RI refer to their response to data request Acadia 1-12.

Acadia 1-19

Request:

What are PPL's average interconnection times for renewable energy projects, including rooftop solar, utility-scale solar, and wind energy projects. Please provide any supporting documentation.

Response:

PPL Electric Utilities Corporation ("PPL Electric") approves 90% of residential distributed energy resources ("DER") applications immediately upon completion of the application through the Distributed Generation Web Portal. If it is determined that minimal additional technical review for compliance with PPL Electric's technical requirements is required on the DER application, the additional review is completed within two business days. With respect to the other 10% of DER applications, 100% are completed within 20 business days.

Interconnections to PPL Electric's transmission system are governed by the PJM Interconnection, LLC ("PJM") process. PPL Electric has a 100% on-time completion rate for all necessary interconnection studies required by the PJM process, enabling timely construction of renewable projects.

Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities Company ("KU") require customers to complete and submit an application for engineering approval for behind-the-meter rooftop solar. It takes approximately 5 business days for application approval. After engineering approval and installer notification of solar project completion, LG&E and KU normally complete the required metering within 5-7 business days.

Utility scale renewable projects wishing to utilize the LG&E and KU transmission system must follow the applicable Open Access Transmission Tariff ("OATT") process. The process is administered by LG&E and KU's independent transmission organization and available on the LG&E and KU OASIS page at the following link: <https://www.oasis.oati.com/LGEE/index.html>

Assuming interconnection times are from the original request date of the interconnection until the commercial operations date, the average interconnection times for projects that have completed the OATT process and are now operating was 623 days. LG&E and KU have two utility scale solar or wind projects in operation on their system.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY
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Acadia 1-20

Request:

Will PPL commit to continuing the Equity Working Group as part of the Energy Efficiency Plan development process?

Response:

PPL and PPL RI refer to their response to data request OER 1-18.

Acadia 1-21

Request:

Does PPL operate physical customer service centers in other jurisdictions? What plans, if any, does PPL have to open customer service centers in Rhode Island? What percentage of PPL customer service representatives are able to assist non-English speaking customers and in what languages?

Response:

PPL Electric Utilities Corporation ("PPL Electric") uses both internal resources and contractor resources to support customer service operations. PPL Electric has a physical contact center in Allentown, PA and has physical contractor locations in Bethlehem, PA, Charlotte, NC and Charleston, SC. All PPL Electric customer service representatives are able to support non-English speaking customers with the assistance of the LanguageLine Solutions translation services, which provides translation services for more than 240 languages.

Louisville Gas & Electric Company ("LG&E"), Kentucky Utilities Company ("KU"), and Old Dominion Power Company ("ODP") operate the following 26 customer service centers:

- In Kentucky
 - LG&E operates 1 physical customer service center.
 - KU operates 23 physical customer service centers.
- In Virginia
 - ODP operates 2 physical customer service centers.

In LG&E, KU, and ODP's physical customer service centers and call centers, all customer service representatives have access to a translation service to assist non-English speaking customers. This service is a multi-lingual resource offering expert translations in more than 150 languages.

PPL and PPL RI refer to their response to data request AG 1-15 regarding plans to open a customer service center in Rhode Island.

Acadia 1-22

Request:

For current jurisdictions, in what languages are PPL's consumer-facing materials provided? What languages are planned for Rhode Island operations?

Response:

PPL Electric Utilities Corporation's ("PPL Electric") customer-facing materials are provided in both English and Spanish.

Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities Company's ("KU") online resources, including My Account, mobile app and the LG&E and KU corporate website permit translation to other languages based on browser and device capability. The automated phone interactive voice response ("IVR") system offers English and Spanish. LG&E and KU's printed materials are provided in English.

PPL and PPL RI intend on having Rhode Island customer service operations to provide customer facing material in both English and Spanish.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

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PPL Corporation and PPL Rhode Island Holdings, LLC's
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Issued on October 1, 2021

Acadia 1-23

Request:

What is PPL's position on the Percentage of Income Payment Plan proposed by Rhode Island advocates? Please include any relevant documentation.

Response:

PPL and PPL RI have not developed a position on the Percentage of Income Payment Plan proposed by Rhode Island advocates. PPL supports customer assistance programs in the jurisdictions that it operates in. See PPL and PPL RI's response to data request OER 1-19.

Acadia 1-24

Request:

Has PPL reviewed the UCLA School of Public Health Study entitled: "Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California", available at <https://coeh.ph.ucla.edu/effects-of-residential-gas-appliances-on-indoor-and-outdoor-air-quality-and-public-health-in-california/>? Does PPL operate any programs to transition vulnerable populations mentioned in this study away from gas cooking appliances? Does PPL foresee operating any such programs in Rhode Island?

Response:

PPL and PPL RI are aware of the UCLA School of Public Health Study entitled: "Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California". PPL does not operate any programs to transition vulnerable populations mentioned in this study away from gas cooking appliances. PPL and PPL RI do not have any current plans to transition customers away from gas cooking appliances in Rhode Island.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY
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Acadia 1-25

Request:

Does PPL have any internal environmental justice commitments or policies? If so, please include relevant documents.

Response:

PPL and PPL RI refer to their response to data request AG 2-3.

Acadia 1-26

Request:

Please list any environmental, environmental justice or equity focused non-profit organizations currently working with PPL in other jurisdictions.

Response:

PPL supports a variety of environmental, environmental justice or equity focused non-profit organizations through the PPL Foundation and the LG&E and KU Foundation. PPL, through the PPL Foundation and LG&E and KU Foundation, seeks to promote a strong community in which all residents are empowered to fulfill their potential. Funding priorities include support for emergency and disaster preparedness, environmental conservation initiatives and neighborhood improvement programs such as economic and small business development initiatives.

Recipients of funding include, but are not limited to:

- Brodheads Watershed Association, Streamwatch Program
- Earth Conservancy, Environmental Workforce Training Program
- Eastern Pennsylvania Coalition for Abandoned Mine Reclamation (EPCAMR), Remote Environmental Education and General Operating Support
- Hawk Mountain Sanctuary, Outdoor Experiences for the Public at Hawk Mountain Sanctuary
- Lacawac Sanctuary Foundation, Imagine Earth: Connecting Underserved Youth to Nature
- Monocacy Farms, Grow Healthy Community Initiative
- National Audubon Society in Pennsylvania, The Samara Project: A Neighborhood Approach to Community Conservation Utilizing the Blooming Blocks Model of Engagement and Action
- Natural Lands Trust, Saving Open Space, Caring for Nature, Connecting People with the Outdoors
- Pennsylvania Envirothon Inc., Statewide environmental awareness and education training program for high school students
- SEEDS of Northeastern Pennsylvania, funding to support research on sustainable regional economies
- The Greenhouse Project, gardening series and nature immersion programs for underserved youth
- The Open Link, Sustaining Communities in the Upper Perkiomen Valley
- Upper Delaware Preservation Coalition, Delaware River Sojourn

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

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- Wayne County Community Foundation, Lackawaxen River Trails
- Wildlife Leadership Academy in central Pennsylvania
- Wilkes University, Annual research data report on regional economic revitalization, sustainability, & equity
- Riverside, the Farnsley-Moremens Landing, a preserve in southwest Jefferson County, KY
- Urban League of Lexington-Fayette County and Louisville Urban League, non-profits that assist African-Americans, other minority groups and the disadvantaged in attaining social and economic equality and stability
- Junior Achievement of Kentuckiana and Junior Achievement of the Bluegrass that help students learn life skills, work readiness, entrepreneurship and financial literacy
- Plant for the Planet, a grant program which funded thousands of trees being planted in various urban and rural settings offering public access, parks and nature preserves
- Arbor Day and Earth Month events in which tree seedlings are distributed in and around Kentucky, ranging from Reforest the Bluegrass in Lexington to Yew Dell Gardens in Crestwood
- Party for the Planet, sponsorships that support families state-wide to celebrate Earth Month at the Louisville Zoo and Arbor Day at the Lexington Arboretum