

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of a General Investigation Regarding )  
the Acceleration of Replacement of Natural Gas )  
Pipelines Constructed of Obsolete Materials ) Docket No. 15-GIMG-343-GIG  
Considered to be a Safety Risk. )

In the Matter of the Application of Kansas Gas )  
Service Company, a Division of ONE Gas, Inc., )  
Regarding the filing of its Plan for the Replacement ) Docket No. 18-KGSG-317-CPL  
of Obsolete Materials in Populated Areas. )

**MOTION TO REMOVE L&U DATA FROM  
ANNUAL REPORT RELATING TO  
KANSAS GAS SERVICE'S PIPE REPLACEMENT PROGRAM**

Kansas Gas Service, a division of ONE Gas, Inc., ("Kansas Gas Service" or "Company") moves the Kansas Corporation Commission ("Commission") for removal of that portion of the Commission's Final Order in Docket No. 15-GIMG-343-GIG ("15-343 Docket") dated September 12, 2017 ("Final Order") and the Commission Staff ("Staff") Memorandum filed in the 15-343 Docket on December 19, 2018 ("Staff Memorandum") that requires Kansas Gas Service to submit an annual report for lost and unaccounted for gas for each city with more than 10,000 customers for at least five years ("L&U Annual Report"). In support of its motion, Kansas Gas Service states as follows:

1. The Final Order in the 15-343 Docket required the natural gas local distribution companies operating in Kansas, including Kansas Gas Service, to develop a plan for the systematic accelerated replacement of all of their bare steel service/yard lines, cast iron mains, and all bare steel mains within a Class 3 location. The Final Order also assigned several tasks to the gas utilities and the Staff related to the pipe replacement plans. One of those tasks included the development of the L&U Annual Report.

2. Beginning in November 2017, Staff met with each of the gas utilities to review the tasks or directives contained in the Final Order. In January 2018, each gas utility filed its respective preliminary plan outlining its proposal for pipe replacement and how it would meet the directives contained in the Final Order, including the submission of the L&U Annual Report. Kansas Gas Service submitted its first L&U Annual Report on March 1, 2018, in its pipeline replacement program compliance docket, Docket No. 18-KGSG-317-CPL ("18-317 Docket").

3. On December 19, 2018, Staff issued its Staff Memorandum. With respect to the L&U Annual Report, the Staff recommended the report be filed for at least five years and that at the end of the five-year period the data should be evaluated to determine the value of this metric in analyzing the performance of the replacement program.

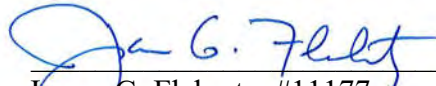
4. Since 2018, Kansas Gas Service has filed seven (7) L&U Annual Reports in the 18-317 Docket. Based upon the data contained in the L&U Annual Reports, Kansas Gas Service has determined that said data provides little or no value as a metric in analyzing the performance of its pipeline replacement program. For example, for several years, the L&U Annual Reports showed a negative line loss and unaccounted for gas amount. This is due, in part, to meter inaccuracies that are within tariff tolerance and accounting and timing of the L&U calculation, but clearly demonstrated how this metric is not a good indicator and should be removed from the annual pipeline replacement program filing made by the Company.

5. Kansas Gas Service has met with Staff to discuss this matter and Staff has indicated to Kansas Gas Service that it is amenable to removing the L&U Annual Report filing requirement subject to obtaining approval from the Commission.

6. Kansas Gas Service filed its 12-months ending May 2024 L&U community report on February 28, 2025, so its request for removal of the L&U report, if approved by the Commission, would

take effect next year.

WHEREFORE, for the reasons set forth herein, Kansas Gas Service respectfully requests that the Commission issue an order granting the Company's motion to remove the L&U Annual Report filing requirement from its annual pipeline replacement plan filing in the 15-343 Docket.



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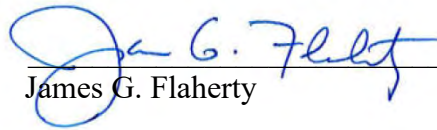
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Attorneys for Kansas Gas Service, a division of ONE  
Gas, Inc.

**VERIFICATION**

STATE OF KANSAS  
COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states: That he is an attorney for Kansas Gas Service, a division of ONE Gas, Inc., and is duly authorized to make this affidavit; that he has read the foregoing Motion to Remove L&U Data from Annual Report Relating to Kansas Gas Service's Pipe Replacement Program, knows the contents thereof; and that the facts set forth therein are true and correct.

  
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James G. Flaherty

SUBSCRIBED AND SWORN to before me this 28<sup>th</sup> day of February, 2025.



  
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Notary Public

Appointment/Commission Expires:

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 28<sup>th</sup> day of February, 2025, addressed to:

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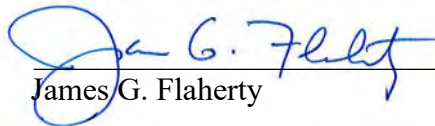
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