

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

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

COMPLIANCE FILING OF KANSAS GAS SERVICE

Kansas Gas Service, a Division of ONE Gas, Inc., (also referred to as “KGS” or the “Company”) in accordance with the memorandum filed by the Staff of the State Corporation Commission of the State of Kansas (“Staff”) on December 19, 2018, in Docket No. 15-GIMG-343-GIG respectfully submits this report detailing progress made on its accelerated plan for replacing obsolete pipe in populated areas in the preceding year. The Company states as follows:

On April 24, 2018, KGS filed in this docket its *Compliance Filing of Kansas Gas Service Final Plan for Replacement of Obsolete Materials in Populated Areas* (“Plan”). Within the Plan, KGS indicated that it would begin working its plan in 2019.

On December 19, 2018, Staff filed a memorandum in Docket No. 15-GIMG-343-GIG making recommendations for the monitoring of various issues raised in the docket, including the monitoring of plans for the accelerated replacement of obsolete pipe. Among its recommendations, on page 8 of the memorandum, Staff suggests that utilities file an annual compliance report by March 31 detailing progress made in the preceding year on the accelerated replacement plan, explaining any deviation from initial projections, any deviations from the previous year’s projections, and revising remaining plan projections. Staff also recommends that utilities update Tables LMH-1 and LMH-2 and progress toward adopting/implementing a Pipeline Safety Management System (“PSMS”).

Given the Commission has not yet had an opportunity to issue an order concerning Staff's recommendation for updating the plan, KGS discussed with Staff the action(s) that would be most helpful to Staff in documenting compliance. KGS agreed to file a statement in this docket concerning the annual compliance by March 31.

As KGS's plan did not begin until January 2019, KGS does not have details on plan progress made during the preceding year or data regarding deviation from the initial plan or deviation from revised projections. At this time, KGS has no revisions to its plan. Additionally, KGS has no meaningful update to the information in Tables LMH-1 and LMH-2 or its progress toward adopting PSMS. However, KGS will meet with Staff after making its 2019 Gas System Reliability Surcharge filing to discuss progress made on the plan by that date.

Additionally, as ordered by the Commission in Docket No. 15-GIMG-343-GIG, KGS filed in this docket its lost and unaccounted for gas by community report on March 1, 2019.

As discussed with Staff, KGS will provide its mileage of mains by type and by community and leak information by April 12, 2019, as ordered by the Commission in Docket No. 15-GIMG-343-GIG.

WHEREFORE, Kansas Gas Service, a division of ONE Gas, prays the Commission enter an Order accepting this compliance filing and for such other relief as the Commission may deem just and proper.

Respectfully submitted,



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VERIFICATION

STATE OF KANSAS)
)
COUNTY OF JOHNSON)

I, Judy Jenkins Hitchye, of lawful age, being first duly sworn upon oath, states as follows: I am a Managing Attorney for Kansas Gas Service, a Division of ONE Gas, Inc. I have read the above *Compliance Filing of Kansas Gas Service* and all the statements therein are true to the best of my knowledge, information and belief.



Judy Jenkins Hitchye

Affiant

SUBSCRIBED AND SWORN to before me on 3/28/19 .



Notary public

My Appointment Expires:

_____ 06/05/2022



CERTIFICATE OF SERVICE

I, Judy Jenkins Hitchye, hereby certify that a copy of the above and foregoing *Compliance Filing of Kansas Gas Service* was forwarded this 28th day of March 2019, addressed to:

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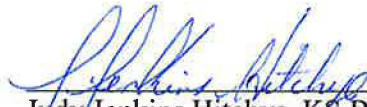
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