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 its Plan for)	Docket No. 18-KGSG-317-CPL
the Replacement of Obsolete Materials in)	
Populated Areas.)	

COMPLIANCE FILING OF KANSAS GAS SERVICE

Kansas Gas Service, a Division of ONE Gas, Inc. ("Kansas Gas Service" or the "Company"), in accordance with the December 19, 2018, memorandum filed by the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively) in Docket No. 15-GIMG-343-GIG, respectfully reports progress made during the preceding year on Kansas Gas Service's accelerated plan to replace obsolete pipe in populated areas. In support thereof, the Company states the following to the Commission:

- 1. On April 24, 2018, Kansas Gas Service filed its Compliance Filing for Replacement of Obsolete Materials in Populated Areas ("Plan"). Within the Plan, Kansas Gas Service indicated it would begin working its Plan in 2019.
- 2. 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, Staff recommended an annual compliance report be filed by March 31: detailing progress made in the preceding year on accelerated replacement plans, explaining any deviations from initial projections or from the previous year's projections, and revising remaining plan projections. Staff also recommended utilities update Tables LMH-1 and LMH-2, and provide a

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¹ See Docket No. 15-GIMG-343-GIG, Notice of Filing Staff Memorandum, p. 8 (December 19, 2018).

discussion on the progress toward adopting/implementing a Pipeline Safety Management System ("PSMS").

- 3. While the Commission has not yet issued an order on Staff's recommendation, Kansas Gas Service is documenting its progress in accordance with the recommendations set out in Staff's memorandum. At this time, Kansas Gas Service is keeping progress for the Fort Riley project separate from progress on its legacy system.
- 4. Kansas Gas Service implemented its plan in January 2019. The attachments to this filing provide an update on the Company's progress made during 2024 and include information regarding any deviations from the Company's initial Plan or deviations from revised projections. Additionally, Kansas Gas Service is providing an update to the information in Tables LMH-1 and LMH-2, and a discussion of the Company's progress toward adopting a PSMS.
- 5. Included in this compliance filing, Kansas Gas Service respectfully reports its mileage of mains by type and by community, as well as leak information, as ordered by the Commission in Docket No. 15-GIMG-343-GIG. In addition, Kansas Gas Service confirms on February 28, 2025, it filed a report in this docket on lost and unaccounted for gas (by community) as ordered by the Commission in Docket No. 15-GIMG-343-GIG.
- 6. Should Staff so desire, Kansas Gas Service will arrange to meet with Staff after making its 2025 Gas System Reliability Surcharge ("GSRS") filing to further discuss the progress made toward the completion of the Plan.

WHEREFORE, Kansas Gas Service prays the Commission accept this compliance filing and for such other relief as the Commission may deem just and reasonable.

Respectfully submitted,

/s/ Robert Elliott Vincent
Robert Elliott Vincent, KS Bar #26028
Managing Attorney
Kansas Gas Service
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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

The undersigned, upon oath first duly sworn, states that he is the Managing Attorney for Kansas Gas Service, a division of ONE Gas, Inc., that he has read the foregoing *Compliance Filing*, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

Robert Elliott Vincent

Subscribed and sworn to before me this 37th day of March, 2025.

Notary Public

My Appointment Expires: 615/2-le

STEPHANIE FLEMING
My Appointment Expires
June 5, 2026

Plan Update

Kansas Gas Service, a division of ONE Gas, Inc., ("KGS" or "Company") began its systematic accelerated replacement plan in January 2019 and expects to replace all cast iron mains, bare steel service lines and bare steel mains located in populated areas within 35 years of the plan's commencement date. Specifically, KGS's plan indicated that all remaining cast iron mains would be replaced by 2019; all bare steel service lines in populated areas would be replaced by the end of 2024; the majority of unprotected bare steel mains in populated areas would be replaced by the end of 2028 and all replaced by 2053; and all protected bare steel mains in populated areas would be replaced by the end of 2053. In 2024, KGS planned to replace 7,500 service lines, 20 miles of unprotected bare steel mains and 13 miles of protected bare steel mains. Actual replacements in 2024 are discussed below.

As a result of the Company's systematic accelerated replacement plan, KGS has accelerated the replacement footage of problematic pipe. In 2019, KGS completed the replacement of cast iron mains as planned. All known cast iron mains have been removed from the Company's system. In 2024, 5,726 bare steel service lines were replaced, completing the removal of all residential bare steel service lines. Additionally, KGS replaced 20 miles of unprotected bare steel mains. Finally, KGS replaced 13 miles of protected bare steel mains in 2024.. KGS remains on target to complete the replacement of protected bare steel mains by 2053.

Since assuming responsibility for operation of the distribution system serving Fort Riley in 2021, Kansas Gas Service acquired an additional 6 miles of unprotected bare steel main and 11 miles of unprotected coated steel. These footages are excluded from this report. Kansas Gas Service is finalizing a separate replacement plan with Ft. Riley for the accelerated replacement of this pipe.

Last year, KGS submitted a revision to the Final Plan for Replacement of Obsolete Materials in Populated Areas. KGS extended the Plan out to 2035 with regard to nonresidential bare steel service lines due to the complexity and costs to the customers when replacing those service lines. Additional adjustments have been made to the rate of replacement of unprotected and protected bare steel mains. The revised Final Plan was filed as part of the Compliance filing on April 1, 2024 and was included as part of Appendix A in that filing. No additional changes have been made at this time.

LMH-1 and LMH-2 Update

See below for the update to exhibits LMH-1 and LMH-2 as requested in the memorandum filed by KCC Staff on December 19, 2018.

LMH-1

Number of Urban Areas	348
Miles bare steel main (1)	1,068
Planned (miles/yr.) Replacement Rate	15-26
Number bare steel service lines ¹	1,610
Planned svc (line/yr.) Replacement Rate ²	178
Miles of cast iron mains	0
Years to completion	29
CY2024 underground leaks per 100 miles obsolete piping	27.7
Total project cost, current \$	\$1,760 million

¹ As of 3/1/2025

² Non-residential bare steel service lines

LMH-2

Main Replacement Estimate (\$/mile)	\$500,000
Service Line Replacement Estimate (\$/ea.)	\$2,611
2024 CAPEX for safety for distribution system	\$57,059,261
Miles undesirable pipe replaced	86
Average costs of replacing undesirable pipe (\$/mile-equivalent) in GSRS	
filing Docket 24-KGSG-215-TAR	\$523,760

Pipeline Safety Management System (PSMS) Implementation Update

Kansas Gas Service (KGS) has been actively working to implement the American Petroleum Institute's (API) Recommended Practice (RP) 1173: Pipeline Safety Management System (PSMS) since 2016. Additionally, on May 20th, 2019, the American Gas Association (AGA) board asked member companies to commit to implementing PSMS within 3 years KGS was an early and enthusiastic supporter of this industry-wide commitment.

Following this commitment, the organization further evaluated our safety management system program and made enhancements to better align processes with the recommended practice as previously reported. This included framework development, implementation of O-Net for non-emergency safety reporting and a safety culture survey. In 2022, KGS completed its implementation of PSMS now branded as the ONE Gas Safety Management System (OSMS). Consistent with the spirit of PSMS, we continue to execute the OSMS, work with contractors on integrating PSMS principles, evaluate maturity and make improvements as needed.

Below is Kansas Gas Service's submission reporting miles of facilities by material type and location. The information is provided in the format prescribed by Staff and reflects data as of March 1, 2025. The Company also provides the leak information as of December 31, 2024. Footage pertaining to the acquisition of Fort Riley has been excluded from the data below.

Miles of	Main by Lo	cation	
	Urban	Rural	Total
Protected Coated	2,400	1,406	3,806
Protected bare	954	689	1,643
Unprotected Coated	6	2	8
Unprotected Bare	110	32	142
Cast Iron	0	0	0
PVC	1	134	135
PE	3,279	1,363	4,642
Aldyl-A & Marlex	1,072	446	1,518
Other	0	0	0
Total	7,822	4,072	11,894

Number of	Services by	Location	
	Urban	Rural	Total
Protected Coated	4,641	2,597	7,238
Protected Bare	175	106	281
Unprotected Coated	354	169	523
Unprotected Bare	707	622	1,329
Cast Iron	0	0	0
PVC	0	122	122
PE	406,572	111,495	518,067
Aldyl-A & Marlex	101,646	12,458	114,104
Other	0	0	0
Total	514,095	127,569	641,664

Leaks Found Duri	Leaks Found During Inspection Year by Leak Classification												
	Class 1	Class 2	Class 3	Total									
# of Leaks Found	1,178	128	496	1,802									
# of Leaks Repaired	1,188	120	573	1,881									
# of Current Leaks	5	10	372	387									

Kansas Gas Service Docket No. 18-KGSG-317-CPL Appendix B

Note:

The differentiation between the urban and rural areas for this report is determined using a population density of 360 people per square mile based on census data. This delineation was derived after a review of Census Blocks at metropolitan interfaces between populated and rural areas and is subject to additional review and potential adjustment by subject matter experts. Because many of the small communities served by Kansas Gas Service have low population densities, they are likely within the rural location type. Kansas Gas Service will continue to refine this report as system improvements are made.

					MATERIA	LS SECTION				INSTALLATION AND OPERATIONS SECTION							
Line Number	Month Reported	WO Number	TYPE OF MATERIAL	(DESCRIBE IF OTHER)	DATE OF MANUFACTURE	MANUFACTURER	PRINT LINE or LABEL	SDR,DR, SCHEDULE or WALL THICKNESS	NOMINAL SIZE	METHOD OF INSTALLATION (Open Trench, Bored, Plowed In, Insertion, Joint Trench, Planted, Unknown, Other - describe, Direct Bury)	Description of Other Method of Installation	TYPE OF SOIL IN CONTACT WITH PIPE (Sand, Loam, Clay, Rocky, Slurry, Other - describe)	Description of Other Type of Soil	OPERATIN G PRESSURE AT TIME OF FAILURE (psig)	OPERATIN G PRESSURE NORMAL RANGE MINIMUM (if known) (psig)	OPERATIN G PRESSURE NORMAL RANGE MAXIMUM (if known) (psig)	DATE OF INSTALLATION
1	January	2024-1000147308	NYLON			AMPFit			2 000	OPEN TRENC	Н			18.0			3/20/1972
	January	2024-1000147305	NYLON			AMPFit				OPEN TRENC				15.0			10/8/1979
	January	2024-1000154155	NYLON			AMPFit				OPEN TRENC				14.0			11/12/1980
	January	2024-1000148821	NYLON			AMPFit				OPEN TRENC				18.0			07/23/1981
	January	2024-1000162477	NYLON			AMPFit				OPEN TRENC				48.0			5/6/1982
	January	2024-1000091959	NYLON			AMPFit				OPEN TRENC				15.0			9/13/1982
	January	2024-1000125888	HDPE - 3306							OPEN TRENC				5.0			3/25/1974
	January	2023-1001492387	MDPE - 2406							OPEN TRENC				48.0			03/17/1993
	January	2024-1000219638	MDPE - 2406							OPEN TRENC				45.0			10/12/2000
	January	2024-1000079602	MDPE - 2406							OPEN TRENC		LOAM		0.8			11/14/1989
	January	2024-1000163118	MDPE - 2406						0.750	OPEN TRENC	H	CLAY		5.0			05/31/1997
	January	2024-1000169225	MDPE - 2406			Driscopipe				OPEN TRENC		CLAY		45.0			10/19/1998
13	January	2023-1000837439	MDPE - 2406						0.750	OPEN TRENC	Н			18.0			11/24/2008
	January	2024-1000152530	MDPE - 2406						0.750	OPEN TRENC	Н			1.0			12/12/2012
15	January	2024-1000088757	MDPE - 2406			Performance Pipe			0.750	OPEN TRENC	Н			12.0			10/31/2023
16	February	2022-1000149713	NYLON			AMPFit			2.000	OPEN TRENC	Н	SAND		14.0			11/8/1978
17	February	2022-1000474341	NYLON			AMPFit				OPEN TRENC		CLAY		39.0			4/6/1982
	February	2023-1001373122	NYLON			AMPFit			0.875	OPEN TRENC	Н	CLAY		18.0			9/21/1982
19	February	2024-1000380758	NYLON			AMPFit			0.500	OPEN TRENC	Н			13.0			9/29/1980
20	February	2024-1000385562	MDPE - 2406			Polypipe			0.750	OPEN TRENC	H	CLAY		45.0			1/30/2024
21	February	2024-1000377268	MDPE - 2406						0.750	OPEN TRENC	Н			18.0			7/18/1996
22	February	2021-1001442025	MDPE - 2306						1.250	OPEN TRENC	Н	CLAY		45.0			1/22/1979
23	February	2021-1001550971	MDPE - 2306						1.250	OPEN TRENC	Н			58.0			12/31/1984
24	February	2024-1000409369	MDPE - 2406						0.750	OPEN TRENC	Н	SAND		48.0			1/2/2000
25	February	2021-1001524860	MDPE - 2406						1.250	OPEN TRENC	Н	CLAY		15.0			10/5/1993
26	February	2024-1000304073	MDPE - 2406			Driscopipe			0.750	OPEN TRENC	Н	CLAY		18.0			2/16/2015
27	March	2022-1001179929	MDPE - 2406						0.875	OPEN TRENC	Н			12.0			6/20/1989
28	March	2024-1000583866	MDPE - 2406						0.750	OPEN TRENC	Н	CLAY		35.0			10/19/2009
29	March	2022-1000716234	NYLON	Brass		AMPFit			2.000	OPEN TRENC	Н	CLAY		15.0			5/3/1979
30	March	2022-1000787229	NYLON			AMPFit			2.000	OPEN TRENC	Н	CALICHE		25.0			8/28/1979
31	March	2022-1000807165	NYLON			AMPFit			0.750	OPEN TRENC	Н	CLAY		45.0			10/5/1979
	March	2023-1001581753	NYLON			AMPFit				OPEN TRENC				18.0			11/2/1979
	March	2022-1000789386	NYLON			AMPFit				OPEN TRENC		CLAY		45.0			12/7/1979
	March	2023-1001381047	MDPE - 2306							OPEN TRENC		CLAY		19.0			10/23/1974
	March	2024-1000304007	HDPE - 3406							OPEN TRENC		LOAM		18.0			2/25/1986
	March	2022-1000545385	MDPE - 2406							OPEN TRENC		CLAY		15.0			10/22/2008
	March	2023-1001133548	HDPE- 3408							OPEN TRENC		CLAY		45.0			1/21/2018
	March	2023-1001503530	MDPE - 2306							OPEN TRENC		LOAM		32.0			9/13/1987
	March	2022-1000613823	MDPE - 2406			Polypipe				OPEN TRENC				15.0			5/4/2015
	March	2024-1000588450	PVC							OPEN TRENC		LOAM		50.0			12/31/1973
	April	2024-1000171517	NYLON			AMPFit				OPEN TRENC		CLAY		34.0			8/3/1979
	April	2022-1000976409	NYLON			AMPFit				OPEN TRENC		CLAY		20.0			11/7/1980
	April	2023-1001419555	NYLON			AMPFit				OPEN TRENC				18.0			8/2/1981
	April	2024-1000741079	, ,	Steel			1			OPEN TRENC		LOAM		25.0			3/24/1985
	April	2024-1000411669	OTHER (Describe)	Steel						OPEN TRENC		LOAM		35.0			8/25/1998
	April	2024-1000696782	MDPE - 2306							OPEN TRENC		LOAM		6.0			9/19/1976
	April	2023-1000487634	MDPE - 2406							OPEN TRENC		OLAN:		45.0			9/18/1997
	April	2024-1000744906	MDPE - 2406							OPEN TRENC		CLAY		48.0			4/5/1998
	April	2024-1000278004	MDPE - 2306							OPEN TRENC		LOAM		35.0			9/18/1989
	April	2024-1000653890	MDPE - 2406	1						OPEN TRENC		LOAM		18.0			8/10/2010
51	April	2024-1000648360	MDPE - 2406						0.750	OPEN TRENC	Н	LOAM		18.0			9/15/2010

				FAILU	JRE AN	ALYSIS SECTION			
Line Number	FAILURE LOCATION (Pipe, Fitting or Joint)	FAILURE IN FITTING (Transition, Valve, Meter Riser, Mechanical Fitting, Heat Fusion Fitting, Electrofusion Fitting, Other - describe)	Description of Other Fitting Type	FAILURE IN JOINT (Mechanical, Electrofusion, Butt Fusion, Socket Fusion, Saddle Fusion, Solvent, Other - describe) Description of Other Joint Type		FAILURE CAUSE (Squeeze Off, Point Loading, Excessive Expansion/Contraction, Excessive External Earth Loading, Installation Error, Previous Impact, Unknown, Unknown - not excavated - abandoned, Unknown - not excavated - re	ADDITIONAL FAILURE CAUSE (Squeeze Off, Point Loading, Excessive Expansion/Contraction, Excessive External Earth Loading, Installation Error, Previous Impact, Unknown, Unknown - not excavated - abandoned, Unknown - not excavated - replaced, Material Defect - describe, Other - describe)	Description of Material Defect or Other Failure Cause	DATE OF FAILURE
1	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	1/22/2024
		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	1/23/2024
		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	1/8/2024
		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	1/22/2024
5		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	1/25/2024
		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	1/25/2024
		OTHER (Describe)	Riser			INSTALLATION ERROR	Installation Error	Improper Backfill	1/17/2024
		THREADED CAP				THREADED CAP (Loose cap, not crack			1/2/2024
		THREADED CAP				THREADED CAP (Loose cap, not crack	e Installation Error	_	1/31/2024
10	JOINT			BUTT FUSION		INSTALLATION ERROR	Installation Error		1/10/2024
	PIPE					INSTALLATION ERROR	Installation Error		1/25/2024
12	PIPE					INSTALLATION ERROR	Installation Error	No sleeve installed	1/26/2024
	PIPE					INSTALLATION ERROR	Installation Error	No sleeve installed	1/2/2024
14	PIPE					INSTALLATION ERROR	Installation Error	Improper Backfill	1/23/24
15	PIPE					INSTALLATION ERROR	Installation Error	No sleeve installed	1/11/24
-		MECHANICAL FITTING (Bolted)	Amp Saddle			MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	2/21/24
		MECHANICAL FITTING (Bolted)	Amp Saddle			MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	2/19/24
		MECHANICAL FITTING (Bolted)	Amp Saddle			MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	2/28/2024
		MECHANICAL FITTING (Bolted)	Amp Saddle			MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	2/22/2024
		OTHER (Describe)	Flex Riser			MATERIAL DEFECT (Describe)	Material Defect - describe		2/23/2024
		THREADED CAP				THREADED CAP (Cracked Cap)	Installation Error		2/22/2024
		THREADED CAP				THREADED CAP (Loose cap, not crack			2/13/2024
-		THREADED CAP				THREADED CAP (Loose cap, not crack			2/21/2024
		THREADED CAP				THREADED CAP (Loose cap, not crack			2/28/2024
		THREADED CAP				THREADED CAP (Seal/O-ring defect)	Installation Error		2/26/2024
-	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	3/8/2023
		HEAT FUSION FITTING		INSTALLATION ERROR		Installation Error			3/5/2024
		TRANSITION		INSTALLATION ERROR		Installation Error			3/25/2024
		MECHANICAL FITTING (Bolted)	Amp Saddle	MATERIAL DEFECT (Des		Material Defect - describe	Amp Saddle		3/25/2024
		MECHANICAL FITTING (Bolted)	Amp Saddle Fitting	MATERIAL DEFECT (Des		Material Defect - describe	Amp Saddle		3/11/2024
		MECHANICAL FITTING (Bolted)	Amp Saddle	MATERIAL DEFECT (Des		Material Defect - describe	Amp Saddle		3/27/2024
		MECHANICAL FITTING (Bolted)	Amp Saddle	MATERIAL DEFECT (Des		Material Defect - describe	Amp Saddle		3/25/2024
		MECHANICAL FITTING (Bolted)	Amp Saddle	MATERIAL DEFECT (Des		Material Defect - describe	Amp Saddle		3/29/2024
		THREADED CAP		THREADED CAP (Loose of					3/18/2024
		THREADED CAP THREADED CAP		THREADED CAP (Loose of					3/19/2024
		THREADED CAP		THREADED CAP (Loose of					3/13/2024 3/19/2024
		THREADED CAP							3/19/2024
	PIPE	TINEADED CAF		THREADED CAP (Seal/O- INSTALLATION ERROR	ing delect	Installation Error	No sleeve installed		3/20/24
	PIPE			MATERIAL DEFECT (Des	cribe)	Material Defect - describe	PVC		3/13/24
		MECHANICAL FITTING (Bolted)	Amp Saddle	SADDLE FUSION	ine)	MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	4/9/24
		MECHANICAL FITTING (Boiled)	Amp Saddle	S, IDDLL I GOIOIN		MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	4/16/24
		MECHANICAL FITTING (Boiled)	Amp Saddle			MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	4/8/24
		MECHANICAL FITTING (But Follower				MATERIAL DEFECT (Describe)	Material Defect - describe	Mechanical Coupling	4/24/24
		MECHANICAL FITTING (Nut Follower				MATERIAL DEFECT (Describe)	Material Defect - describe	Mechanical Coupling	4/2/24
	FITTING	THREADED CAP	,			THREADED CAP (Loose cap, not crack			4/15/24
		THREADED CAP				THREADED CAP (Loose cap, not crack			4/23/24
		THREADED CAP				THREADED CAP (Loose cap, not crack			4/23/2024
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	4/23/2024
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	4/8/2024
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	4/2/2024
, 51		1			1				.,_,_

				MATERIA	LS SECTION				INSTALLATION AND OPERATIONS SECTION							
Line Number Month Reported	d WO Number	TYPE OF MATERIAL	(DESCRIBE IF OTHER)		MANUFACTURER	PRINT LINE or LABEL	SDR,DR, SCHEDULE or WALL THICKNESS	NOMINAL SIZE	METHOD OF INSTALLATION (Open Trench, Bored, Plowed In, Insertion, Joint Trench, Planted, Unknown, Other- describe, Direct Bury)	Description of Other Method of Installation	TYPE OF SOIL IN CONTACT WITH PIPE (Sand, Loam, Clay, Rocky, Slurry, Other - describe)	Description of Other Type of Soil	OPERATIN G PRESSURE AT TIME OF FAILURE (psig)	OPERATIN G PRESSURE NORMAL RANGE MINIMUM (if known) (psig)	G	DATE OF INSTALLATION
52 April	2024-1000691107	MDPE - 2406			Driscopipe			0.875	OPEN TRENC	H			13.0			3/6/1991
53 April	2024-1000606813	MDPE - 2406			Performance Pipe				OPEN TRENC		LOAM		35.0			7/10/2003
54 April	2024-1000564613	MDPE - 2406			Performance Pipe				OPEN TRENC		207		18.0			3/15/2016
55 May	2023-1001934936	NYLON			AMPFit			0.500	OPEN TRENC	Н	CLAY		18.0			9/29/1980
56 May	2023-1001940618	NYLON			AMPFit			0.500	OPEN TRENC	Н			48.0			10/17/1979
57 May	2024-1000837444	NYLON			AMPFit			0.500	OPEN TRENC	Н	LOAM		18.0			10/25/1982
58 May	2024-1000898730	NYLON			AMPFit			0.500	OPEN TRENC	Н			48.0			9/30/1981
59 May	2022-1000948924	MDPE - 2406							OPEN TRENC		CLAY		15.0			12/7/1994
60 May	2022-1000968680	MDPE - 2306						1.000	OPEN TRENC	Н	CLAY		45.0			10/23/1989
61 May	2023-1000295304	MDPE - 2406							OPEN TRENC		CLAY		45.0			10/4/2002
62 May	2024-1000773605	MDPE - 2406						0.875	OPEN TRENC	Н	CLAY		18.0			10/12/1992
63 May	2024-1000805764	MDPE - 2406						0.750	OPEN TRENC	Н			6.0			6/15/2020
64 May	2024-1000836465	HDPE - 3406							OPEN TRENC				1.0			9/25/1977
65 May	2024-1000825395	MDPE - 2306							OPEN TRENC		LOAM		32.0			12/31/1978
66 June	2024-1000924282	NYLON			AMPFit				OPEN TRENC				48.0			10/17/1979
67 June	2024-1000900861	NYLON			AMPFit				OPEN TRENC				18.0			5/9/1982
68 June	2024-1001037145	NYLON			AMPFit				OPEN TRENC				48.0			6/6/1983
69 June	2024-1000974687	MDPE - 2306							OPEN TRENC		CLAY		45.0			7/17/1985
70 June	2022-1000987698	MDPE - 2406							OPEN TRENC		CLAY		45.0			8/26/1997
71 June	2024-1000966945	MDPE - 2406							OPEN TRENC		ROCKY		20.0			7/16/2007
72 June	2024-1000863183	MDPE - 2406							OPEN TRENC				18.0			3/17/2008
73 July	2024-1000115874	PLASTICMD			AMPFit				OPEN TRENC				18.0			2/9/1982
74 July	2024-1001171622	PLASTICHD			AMPFit				OPEN TRENC				15.0			10/21/1985
75 July	2024-1000369218	PLASTICHD							OPEN TRENC		CLAY		48.0			7/16/1978
76 July	2022-1000910561	PLASTICHD							OPEN TRENC		CLAY		48.0			8/3/1988
77 July	2023-1001712506	PLASTICHD							OPEN TRENC		CLAY		1.3			11/25/1996
78 July	2024-1000820546	PLASTICMD							OPEN TRENC		ROCKY		45.0			10/22/2000
79 July	2024-1001135574	PLASTICHD							OPEN TRENC		CLAY		48.0			12/23/2009
80 July	2022-1001291429	PLASTICM8							OPEN TRENC				45.0			8/9/2021
81 July	2022-1001920491	PLASTICHD							OPEN TRENC		CLAY		15.0			12/16/1975
82 July	2024-1001162205	PLASTICMD							OPEN TRENC				48.0			6/12/1996
83 July	2024-1001078571	PLASTICMD							OPEN TRENC		CLAY		54.0			3/27/23
84 July	2024-1001127323	PLASTICMD							OPEN TRENC		CLAY		20.0			1/7/89
85 August	2024-1001177282	NYLON			AMPFit				OPEN TRENC		CLAY		48.0			5/9/82
86 August	2024-1001223129	MDPE - 2306							OPEN TRENC		LOAM		17.0			12/10/72
87 August	2024-1001308756	MDPE - 2306							OPEN TRENC				18.0			10/22/86
88 August	2024-1000836552	MDPE - 2406							OPEN TRENC		LOAM		45.0			1/24/90
89 August	2024-1001289061	MDPE - 2406							OPEN TRENC		CLAY		38.0			5/5/99
90 August	2024-1001341524	MDPE - 2406				-			OPEN TRENC		CLAY	-	38.0			5/5/99
91 August	2024-1000923799	MDPE - 2406							OPEN TRENC		LOAM		36.0			4/7/19
92 August	2024-1000599794	MDPE - 2406							OPEN TRENC		CLAY		18.0			3/31/20
93 August	2022-1001434092	MDPE - 2306	-						OPEN TRENC		OLAY.		45.0			2/23/87
94 August	2024-1001398880	MDPE - 2406				-			OPEN TRENC		CLAY		30.0			3/5/2017
95 August	2024-1001323924	MDPE - 2306							OPEN TRENC				1.0			10/3/1973
96 August	2024-1000990762	MDPE - 2406	-			-			OPEN TRENC		CLAY	-	13.0		-	6/14/2021
97 August	2024-1001201127	MDPE - 2406	-			-			OPEN TRENC		CLAY		50.0			9/20/2023
98 August	2024-1001277474 2024-1001484604	MDPE - 2406 NYLON		-	AMPFit				OPEN TRENC		CLAY	-	30.0 45.0			8/20/2000 2/25/1979
99 September 100 September	2024-1001484604	NYLON	-		AMPFit				OPEN TRENC		CLAY		45.0			8/3/1979
100 September	2024-1001458075	OTHER (Describe)	Steel		AWIFFIL	-			OPEN TRENC		CLAY	-	15.0		-	12/28/1980
	2024-1001447724	NYLON	Sieei		AMPFit				OPEN TRENC		CLAY		45.0			
102 September	2022-1001033252	INTLOIN			AIVIPFIL			0.750	TOLEN LKENC	П	CLAT		45.0			6/21/1981

				FAILU	JRE AN	ALYSIS SECTION			
Line Number	FAILURE LOCATION (Pipe, Fitting or Joint)	FAILURE IN FITTING (Transition, Valve, Meter Riser, Mechanical Fitting, Heat Fusion Fitting, Electrofusion Fitting, Other - describe)	Description of Other Fitting Type	FAILURE IN JOINT (Mechanical, Electrofusion, Butt Fusion, Socket Fusion, Saddle Fusion, Solvent, Other - describe)	Description of Other Joint Type	FAILURE CAUSE (Squeeze Off, Point Loading, Excessive Expansion/Contraction, Excessive External Earth Loading, Installation Error, Previous Impact, Unknown, Unknown - not excavated - abandoned, Unknown - not excavated - replaced, Material Defect - describe, Other - describe)	ADDITIONAL FAILURE CAUSE (Squeeze Off, Point Loading, Excessive Expansion/Contraction, Excessive External Earth Loading, Installation Error, Previous Impact, Unknown, Unknown - not excavated - abandoned, Unknown - not excavated - replaced, Material Defect - describe, Other - describe)	Description of Material Defect or Other Failure Cause	DATE OF FAILURE
52	PIPE					INSTALLATION ERROR	Installation Error	No sleeve installed	4/24/2024
	PIPE					INSTALLATION ERROR	Installation Error	No sleeve installed	4/4/2024
	PIPE			SADDLE FUSION		INSTALLATION ERROR	Installation Error	No sleeve installed	4/5/2024
55	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	5/31/2024
56	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	5/28/2024
57	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	5/10/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	5/23/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			5/22/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			5/1/2024
	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	5/30/2024
	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	5/29/2024
	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	5/2/2024
	FITTING	TRANSITION		DUITT FUNDA		INSTALLATION ERROR	Installation Error		5/14/2024
65		MECHANICAL FITTING (D-HI)		BUTT FUSION		INSTALLATION ERROR	Installation Error	A C	5/30/2024
	FITTING FITTING	MECHANICAL FITTING (Bolted) MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	6/11/2024 6/18/2024
	FITTING	MECHANICAL FITTING (Boiled)				MATERIAL DEFECT (Describe) MATERIAL DEFECT (Describe)	Material Defect - describe Material Defect - describe	Amp Saddle	6/20/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke		Amp Saddle	6/5/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			6/14/2024
	FITTING	THREADED CAP				THREADED CAP (Cracked Cap)	Installation Error		6/4/2024
	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	6/10/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	7/31/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	7/30/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke		7 trip cadalo	7/1/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			7/19/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			7/16/2024
78	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			7/22/2024
79	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			7/11/2024
80	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			7/9/2024
81	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	7/16/2024
82	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	7/17/2024
83	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	7/3/2024
84		HEAT FUSION FITTING		SADDLE FUSION		INSTALLATION ERROR	Installation Error		7/8/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	8/2/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			8/15/2024
	FITTING	THREADED CAP				THREADED CAP (Cracked Cap)	Installation Error		8/16/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			8/1/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			8/10/2024
90		THREADED CAP				THREADED CAP (Loose cap, not cracke			8/22/2024
	FITTING	THREADED CAP				THREADED CAP (Loose cap, not cracke			8/6/2024
	FITTING	THREADED CAP THREADED CAP				THREADED CAP (Loose cap, not cracke		-	8/19/2024
	FITTING FITTING	THREADED CAP				THREADED CAP (Seal/O-ring defect) THREADED CAP (Loose cap, not cracke	Installation Error		8/30/2024 8/30/2024
	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error		8/30/2024
	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	8/2/2024
96		ITANOLION		BUTT FUSION		INSTALLATION ERROR	Installation Error	140 Siceve installed	7/26/2024
	PIPE			DOTT TOOLON		INSTALLATION ERROR	Installation Error		8/7/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	9/23/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	9/13/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Dresser - Mechanical Failure	9/13/2024
	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	9/13/2024

					MATERIA	LS SECTION				INSTAL	LATION	AND O	PERATI	ONS SE	CTION	
Line Number	Month Reported	WO Number	TYPE OF MATERIAL	(DESCRIBE IF OTHER)		MANUFACTURER	PRINT LINE or LABEL	SDR,DR, SCHEDULE or WALL THICKNESS	NOMINAL SIZE	METHOD OF INSTALLATION (Open Trench, Bored, Plowed In, Insertion, Joint Trench, Planted, Unknown, Other- describe, Direct Bury)	TYPE OF SOIL IN CONTACT WITH PIPE (Sand, Loam, Clay, Rocky, Slurry, Other - describe)	of Other Type of Soil	OPERATIN G PRESSURE AT TIME OF FAILURE (psig)	G PRESSURE	OPERATIN G PRESSURE NORMAL RANGE MAXIMUM (if known) (psig)	DATE OF INSTALLATION
103	September	2024-1001373210	NYLON			AMPFit			2 000	OPEN TRENCH	CLAY		15.0			11/16/1981
		2024-1001494133	NYLON			AMPFit				OPEN TRENCH	02		18.0			5/2/1982
	-	2024-1001497129	MDPE - 2306			,				OPEN TRENCH	CLAY		45.0			11/9/1987
		2022-1001189842	MDPE - 2406							OPEN TRENCH	02		24.0			10/1/1991
			MDPE - 2406							OPEN TRENCH	CLAY		55.0			5/27/1992
		2024-1001474687	MDPE - 2406							OPEN TRENCH	CLAY		15.0			5/1/2015
			MDPE - 2306							OPEN TRENCH	CLAY		45.0			8/4/1980
			MDPE - 2406							OPEN TRENCH			12.0			5/1/1994
			MDPE - 2406							OPEN TRENCH			1.0			12/7/2009
		2024-1001440205	MDPE - 2406							OPEN TRENCH			1.0			7/4/2017
			MDPE - 2406							OPEN TRENCH	LOAM		24			6/4/2019
	October	2023-1000098039	NYLON			AMPFit				OPEN TRENCH	CLAY		15			11/30/1980
	October		MDPE - 2406							OPEN TRENCH	ROCKY		58			4/21/1991
			MDPE - 2306							OPEN TRENCH	1.100.11		45			4/9/1987
	October	2023-1000493242	MDPE - 2306							OPEN TRENCH			40			11/3/1987
	October	2024-1001544017	MDPE - 2406							OPEN TRENCH			45			3/24/2002
		2024-1001341432	PVC							OPEN TRENCH	SAND		30			8/28/2018
	October	2023-1001410791	MDPE - 2406							OPEN TRENCH	CLAY		45			5/5/2013
	October	2024-1001572132	MDPE - 2406							OPEN TRENCH	CLAY		3			3/3/2015
	October	2024-1001574633	MDPE - 2406							OPEN TRENCH	CLAY		1.5			9/13/2023
	October		HDPE - 3406							OPEN TRENCH	CLAY		17			10/16/1980
	October		MDPE - 2306							OPEN TRENCH	OTHER		15			7/22/1986
	October		MDPE - 2406							OPEN TRENCH	CLAY		20			4/22/2013
			NYLON			AMPFit				OPEN TRENCH	02		48			9/2/1981
		2024-1001003954	OTHER (Describe)	Steel		7 4441 7 14				OPEN TRENCH	LOAM		8			7/6/2009
		2024-1001441708	MDPE - 2406	0.00.						OPEN TRENCH	207		48			10/6/2002
			MDPE - 2406			RW Lvall				OPEN TRENCH			18			5/30/2024
_		2024-1001737727	MDPE - 2306							OPEN TRENCH	LOAM		18			5/4/1976
			MDPE - 2306							OPEN TRENCH	CLAY		12			11/10/1977
		2024-1001442720	MDPE - 2406							OPEN TRENCH	OTHER		48			11/4/2006
		2024-1001677663	MDPE - 2406							OPEN TRENCH			50			2/11/2007
		2024-1001699783	MDPE - 2406							OPEN TRENCH	CLAY		58			1/19/2004
			MDPE - 2406							OPEN TRENCH	CLAY		40			5/23/2017
		2024-1001636008	MDPE - 2306							OPEN TRENCH	CLAY		15			7/28/1982
		2024-1001683041	HDPE - 3406							OPEN TRENCH	CLAY		15			3/20/1988
		2024-1001749604	MDPE - 2406							OPEN TRENCH			35			10/9/2007
			MDPE - 2406							OPEN TRENCH	LOAM		25			2/22/1999
		2024-1001831770	MDPE - 2406							OPEN TRENCH	CLAY		40			9/1/2005
141	December	2024-1001786115	MDPE - 2306							OPEN TRENCH	CLAY		14.5			3/2/1988
142	December	2024-1001229488	MDPE - 2406						0.75	OPEN TRENCH			48			4/27/1997
		2024-1001894715	MDPE - 2406							OPEN TRENCH	CLAY		9			11/18/2015
		2024-1001693256	MDPE - 2406							OPEN TRENCH	CLAY		48			11/29/2017
			MDPE - 2406						0.75	OPEN TRENCH	CLAY		45			3/18/1996

		FAILURE ANALYSIS SECTION								
Line Number	FAILURE LOCATION (Pipe, Fitting or Joint)	FAILURE IN FITTING (Transition, Valve, Meter Riser, Mechanical Fitting, Heat Fusion Fitting, Electrofusion Fitting, Other - describe)	Description of Other Fitting Type	FAILURE IN JOINT (Mechanical, Electrofusion, Butt Fusion, Socket Fusion, Saddle Fusion, Solvent, Other - describe)	Description of Other Joint Type	FAILURE CAUSE (Squeeze Off, Point Loading, Excessive Expansion/Contraction, Excessive External Earth Loading, Installation Error, Previous Impact, Unknown, Unknown - not excavated - abandoned, Unknown - not excavated - replaced, Material Defect - describe, Other - describe)	ADDITIONAL FAILURE CAUSE (Squeeze Off, Point Loading, Excessive Expansion/Contraction, Excessive External Earth Loading, Installation Error, Previous Impact, Unknown, Unknown - not excavated - abandoned, Unknown - not excavated - replaced, Material Defect - describe, Other - describe)	Description of Material Defect or Other Failure Cause	DATE OF FAILURE	
103	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	9/13/2024	
		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	9/23/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke		Amp Saddle	9/25/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke			9/4/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke		 	9/4/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke		+	9/26/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	9/6/2024	
		TRANSITION TRANSITION				INSTALLATION ERROR INSTALLATION ERROR	Installation Error	No sleeve installed	9/23/2024 9/26/2024	
		-					Installation Error	No sleeve installed		
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	9/24/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	9/18/2024	
		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	10/30/2024	
		METER RISER				INSTALLATION ERROR	Installation Error		10/15/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke			10/18/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke			10/3/2024	
-		THREADED CAP				THREADED CAP (Loose cap, not cracke			10/11/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	PVC	10/29/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	10/1/2024	
121	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	10/21/2024	
122	FITTING	TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	10/15/2024	
123	JOINT			SADDLE FUSION		INSTALLATION ERROR	Installation Error		10/8/2024	
124	JOINT			SADDLE FUSION		INSTALLATION ERROR	Installation Error		10/3/2024	
125	PIPE					INSTALLATION ERROR	Installation Error	Improper Backfill	10/29/2024	
126	FITTING	MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Amp Saddle	11/6/2024	
127		MECHANICAL FITTING (Bolted)				MATERIAL DEFECT (Describe)	Material Defect - describe	Mechanical Failure - Dresser	11/5/2024	
		METER RISER				MATERIAL DEFECT (Describe)	Material Defect - describe		9/12/2024	
		METER RISER				MATERIAL DEFECT (Describe)	Material Defect - describe		11/4/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke			11/21/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke			11/4/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke		1	11/21/2024	
		THREADED CAP				THREADED CAP (Loose cap, not cracke Installation Error			11/4/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	11/12/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	11/7/2024	
	JOINT	TIGHTOH		SADDLE FUSION		INSTALLATION ERROR	Installation Error	140 Siceve Ilistalieu	11/20/2024	
	PIPE			ONDDEL I UDION		POINT LOADING	Point Loading	Improper Backfill	11/5/2024	
	PIPE					INSTALLATION ERROR	Installation Error	IIII proper Dackilli	11/24/2024	
		THREADED CAP							12/16/2024	
139 FITTING 140 FITTING		THREADED CAP				THREADED CAP (Loose cap, not cracke Installation Error THREADED CAP (Loose cap, not cracke Installation Error			12/10/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	12/12/2024	
		TRANSITION				INSTALLATION ERROR				
							Installation Error	No sleeve installed	12/31/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	12/30/2024	
		TRANSITION				INSTALLATION ERROR	Installation Error	No sleeve installed	12/5/2024	
145	PIPE					POINT LOADING	Point Loading	Improper Backfill	12/19/2024	

CERTIFICATE OF SERVICE

I, Robert Elliott Vincent, hereby certify that a copy of the above and foregoing

Compliance Filing was forwarded this 31st day of March 2025, addressed to:

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