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April 12, 2019

Kansas Corporation Commission
Attn: Lynn M. Retz, Secretary to Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Re: Docket No. 15-GIMG-343-GIG; Compliance Filing: Docket 18-KGSG-317-CPL

Dear Ms. Retz,

The Commission's order in Docket No. 15-GIMG-343-GIG required KGS to annually report miles of facilities by material type and location type as well as leaks found during the inspection year by leak classification. On March 20, 2019, Staff informally granted KGS a two-week extension to provide this information no later than April 12, 2019.

The required information is attached.

Sincerely,



Janet Buchanan
Director - Rates and Regulatory Affairs
Kansas Gas Service, a Division of ONE Gas, Inc.

cc: Leo Haynos

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 31, 2019. The Company also provides the leak information as of December 31, 2018, requested by Staff.

Miles of Main by Location			
	Urban	Rural	Total
Protected Coated	2,442	1,383	3,825
Protected Bare	1,080	687	1,767
Unprotected Coated	0	1	1
Unprotected Bare	157	80	237
Cast Iron	2	-	2
PVC	1	146	148
PE	2,792	1,177	3,969
Aldyl-A & Marlex	1,087	452	1,539
Other	-	-	-
Total	7,562	3,926	11,488

Number of Services by Location			
	Urban	Rural	Total
Protected Coated	6,293	2,381	8,674
Protected Bare	5,789	2,572	8,361
Unprotected Coated	3,858	1,359	5,217
Unprotected Bare	26,269	5,576	31,845
Cast Iron	-	-	-
PVC	1	56	57
PE	352,761	104,036	456,797
Aldyl-A & Marlex	107,438	12,997	120,435
Other	-	-	-
Total	502,409	128,977	631,386

Leaks Found During Inspection Year by Leak Classification				
	Class 1	Class 2	Class 3	Total
# of Leaks Found	1,423	176	623	2,222
# of Leaks Repaired	1,426	196	532	2,154
# of Current Leaks		9	659	668

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.

The Company's mains and services asset register databases were not originally configured and populated with manufacturer, model and PE material designation data. As part of the Company's more recent data improvement initiatives, Kansas Gas Service will now be configuring systems to track this information. Until these data points can be collected and the asset register systems populated, Kansas Gas Service is entering default values based on information gathered from purchasing history, subject matter expert advice, and material manufacture dates. The miles of Marlex resin mains and services is primarily derived from this default value analysis. Also, our review of installation records used to update the asset register supports the Company's understanding that Aldyl-A was not a material type generally purchased by Kansas Gas Service or its predecessors; however, the records review did lead to the discovery of a few miles of this material type included in the inventory. Kansas Gas Service currently has 8.7 miles of Aldyl-A distribution mains in its inventory.

Due to changes made to the Company's database systems over the last several months, distribution mains and services will not reconcile to the PHMSA distribution reports. However, Kansas Gas Service will continue to refine this report as system improvements are made.