

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

In the Matter of the Petition of Kansas Gas)
Service, a Division of ONE Gas, Inc. for)
Approval by the Commission to Change its) Docket No. 25-KGSG-386-TAR
Gas System Reliability Surcharge Per)
K.S.A. 66-2201 through 66-2204.)

PETITION TO CHANGE GSRS RATE SCHEDULES

Kansas Gas Service, a division of ONE Gas, Inc., (“Kansas Gas Service” or “Company”) pursuant to K.S.A. 66-2201, *et seq.*, respectfully petitions to change its Gas System Reliability Surcharge (“GSRS”) tariff approved in Docket No. 09-KGSG-199-TAR (the “199 Docket”). In support of its Petition, Kansas Gas Service states the following to the State Corporation Commission of the State of Kansas (“Commission”):

I. DESCRIPTION OF KANSAS GAS SERVICE

1. Kansas Gas Service is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Commission. ONE Gas, Inc., is a 100% regulated natural gas distribution company which operates the largest natural gas public utilities in Kansas and Oklahoma, and the third largest in Texas. Kansas Gas Service’s principal place of business in Kansas is 7421 West 129th Street, Overland Park, Kansas 66213.

II. COMMUNICATION

2. The names, addresses, phone numbers, and email addresses of the persons authorized to receive pleadings, notices, orders, and communications for Kansas Gas Service are:

Robert Elliott Vincent
Managing Attorney
Kansas Gas Service,
a division of ONE Gas, Inc.
7421 W. 129th Street
Overland Park, Kansas 66213
robert.vincent@onegas.com

Lorna Eaton
Manager of Rates & Regulatory
Kansas Gas Service,
a division of ONE Gas, Inc.
7421 W. 129th Street
Overland Park, Kansas 66213
lorna.eaton@onegas.com

Phone: 913-319-8615
Stephanie Fleming
Legal Assistant
Kansas Gas Service,
a division of ONE Gas, Inc.
7421 W. 129th Street
Overland Park, Kansas 66213
stephanie.fleming@onegas.com
Phone: 913-319-8619

Phone: 913-319-8662
James G. Flaherty
Anderson & Byrd, LLP
216 S. Hickory ~ P.O. Box 17
Ottawa, Kansas 66067
jflaherty@andersonbyrd.com
Phone: (785) 242-1234

III. CONDENSED BACKGROUND

3. In 2006, the Kansas Legislature passed the Gas Safety and Reliability Policy Act (the “Act”).¹ The Act allows natural gas public utilities to establish or change a GSRS.² A GSRS rate schedule allows a natural gas public utility to recover the costs of eligible infrastructure system investments, as defined in the Act.³ In 2018, the Kansas Legislature amended the Act and, among other things, expanded the types of investments eligible for recovery using a GSRS rate schedule.⁴ Kansas Gas Service’s GSRS was established in the 199 Docket, and has continually been updated annually or reset during general rate proceedings. This is Kansas Gas Service’s first request to change its GSRS rate schedule since Kansas Gas Service’s last general rate proceeding, Docket No. 24-KGSG-610-RTS (the “610 Docket”).

IV. REQUEST TO CHANGE GSRS RATE SCHEDULE

4. Pursuant to the Act, Kansas Gas Service respectfully petitions the Commission to change the Company’s GSRS rate schedule to recover costs of eligible infrastructure system investments. As demonstrated in this Petition and its supporting testimony, the infrastructure system investments contained in this Petition are eligible for recovery under the Act. Likewise,

¹ L. 2006, ch. 99, §§ 1-5; *Codified at* K.S.A. 66-2201 through K.S.A. 66-2204.

² *See* K.S.A. 66-2203(a).

³ *See* K.S.A. 66-2203(a); K.S.A. 66-2202.

⁴ L. 2018, ch. 40, §§ 1-5.

the Company's Petition meets the Act's minimum and maximum filing timelines.⁵ Therefore, Kansas Gas Service should be permitted to recover revenue of \$7,207,932 through its GSRS.

5. Every year, and in the provision of natural gas utility service, Kansas Gas Service is required to relocate and replace certain segments of its system. Likewise, Kansas Gas Service invests in both physical and cybersecurity projects to protect assets. Kansas Gas Service's GSRS tariff, which is the subject of this Petition, allows the Company to recover the expenses associated with these projects between rate cases through a per-customer surcharge.

A. Introduction of Witnesses

6. Jordan R. Robl is a Managing Engineer for Kansas Gas Service. Mr. Robl supports the eligibility of the projects included in the Company's GSRS Petition. Mr. Robl describes how different projects are categorized, details project costs, and outlines which specific provision of the Act supports cost recovery.

7. Andrew S. Copeland is ONE Gas, Inc.'s Director of Cybersecurity. Mr. Copeland supports the eligibility of cybersecurity investments in Kansas Gas Service's proposed GSRS.

8. Amy C. Van Nice is a Rates Specialist in Kansas Gas Service's Rates and Regulatory Department. Ms. Van Nice supports the calculation of the GSRS revenue requirement, the allocation of relevant costs to customer classes, the development and design of GSRS rates, and the revised GSRS tariff.

B. Kansas Gas Service's Projects Meet the Act's Eligibility Criteria

9. Pursuant to K.S.A. 66-2203(a), a natural gas public utility may:

file a petition and proposed rate schedules with the Commission to establish or change GSRS rate schedules that will allow for the adjustment of the natural gas

⁵ See K.S.A. 66-2203 (b)-(d) (detailing requirement to have general rate proceedings decided or dismissed within the previous 60 months; detailing exceptions to this general rule); *See also* K.S.A. 66-2204(c)(limiting GSRS petitions to no more often than once every twelve months). The Commission issued its order in Kansas Gas Service's last base rate proceeding, the 610 Docket, on October 3, 2024.

public utility's rates and charges to provide for the recovery of costs for eligible infrastructure system investments.

10. K.S.A. 66-2202(d)(1) through (3) defines “eligible infrastructure system investments” as natural gas public utility plant projects that:

- a. Do not increase revenues by directly connecting the infrastructure investments to new customers;
- b. are in service and used and required to be used; and
- c. were not included in the natural gas public utility’s rate base in its most recent general rate case.

11. K.S.A. 66-2202(f)(1) through (5), defines “natural gas public utility plant projects” to consist of the following:

- a. Mains, meters, valves, service lines, regulator stations, vaults and other pipeline system components installed to replace, upgrade or modernize obsolete facilities,⁶ including, but not limited to, installation to comply with state or federal safety requirements replacing existing facilities;
- b. main relining projects, service line insertion projects, joint encapsulation projects and other similar projects extending the useful life or enhancing the integrity of pipeline system components including, but not limited to, projects undertaken to comply with state or federal safety requirements;
- c. facility relocations required due to construction or improvement of a highway, road, street, public way or other public work by or on behalf of the United States, this state, a political subdivision of this state or another entity having the power of eminent domain provided that the costs related to such projects have not been reimbursed to the natural gas public utility;
- d. system security costs⁷ including allocated corporate costs incurred by a natural gas public utility; and

⁶ Defined in K.S.A. 66-2202(h)(“[O]bsolete facility means a facility: (1) Comprised of materials that are no longer produced or supported by the manufacturer; (2) that shows signs of physical deterioration; or (3) does not meet current safety codes or industry standards. “Obsolete facility” includes the cost-effective replacement of other facilities that are not considered obsolete when the replacement of such is done in conjunction with the replacement of an obsolete facility.”) (internal quotations omitted).

⁷ Defined in K.S.A. 66-2202(i)(“[S]ystem security shall mean capital expenditures to protect a utility's capital assets, including both physical assets and cyber assets, such as networks, computers, servers, operating systems, storage, programs and data, from attack, damage or unauthorized use and access.”) (internal quotations omitted).

- e. investments made in accordance with the utility's safety and risk management programs.

12. Mr. Robl and Mr. Copeland testify on eligible infrastructure system investments and natural gas public utility plant projects contained in this Petition. Mr. Robl testifies the Act separates projects into two categories: safety and public improvement.⁸ Mr. Robl's Exhibits JRR-1, JRR-3, and JRR-4 outline safety projects, including physical security costs. Exhibit JRR-2 outlines public improvement projects. Mr. Copeland's Exhibit ASC-1 identifies cybersecurity-related security projects.

i. Safety Projects

13. Exhibit JRR-1 details safety related projects unitized and included on Kansas Gas Services books as plant in service between May 1, 2024, and February 28, 2025. These safety investments, which are broken out into seven separate categories,⁹ are recoverable pursuant to K.S.A. 66-2202(f)(1), (2), (4), and (5). Exhibit JRR-1 outlines the investments' qualification, related statute or regulation, unitization date, cost center, function, job order, description, Federal Energy Regulatory Commission ("FERC") account, and cost. As required by the Commission in the 199 Docket, Mr. Robl's Exhibit JRR-4 provides an expanded explanation of projects included in this Petition pursuant to 49 C.F.R. 192.613.

14. Exhibit JRR-3 summarizes service line replacements as well as a limited group of non-service line projects, which are grouped together using blanket work orders given their relatively small dollar amounts and similarity. These safety related projects are recoverable

⁸ See K.S.A. 66-2202(f)(1)-(2), (4)-(5) (outlining physical and cybersecurity safety projects); See also K.S.A. 66-2202(f)(3) (outlining public improvement projects, i.e., government-mandated relocations).

⁹ These categories include: (1) Bare Steel Main Replacement, (2) Bare Steel Service Line Replacement (3) Cathodic Protection, (4) Continuing Surveillance, (5) Physical Security, (6) Pipeline System Components, and (7) Pressure and Measurement (Obsolescence).

pursuant to K.S.A. 66-2202(f)(1) or (3), and were unitized between May 1, 2024, and February 28, 2025.

15. Exhibit ASC-1 describes system security projects related to protecting Kansas Gas Service's cyber assets and recoverable pursuant to K.S.A. 66-2202(f)(4). These projects are related to corporate allocated costs, for which Kansas Gas Service is only seeking to recover its allocated amount.

ii. Public Improvement Projects

16. Exhibit JRR-2 details public improvement projects recoverable pursuant to K.S.A. 66-2202(f)(3). These public improvement projects, which Kansas Gas Service has not been fully reimbursed for, were unitized between May 1, 2024, and February 28, 2025. Generally, Exhibit JRR-2 contains the same information as Exhibit JRR-1. Because Exhibit JRR-2 contains public improvement investments, the entity requesting the project (e.g., a city) is detailed rather than a safety-related regulation.

C. Revenue Threshold

17. K.S.A. 66-2203(a) establishes minimum and maximum thresholds of total annualized GSRS revenues.¹⁰ The Commission may not approve Kansas Gas Service's Petition if the total annualized revenues are:

- a. below the lesser of \$1,000,000 or 1/2% of the base revenue level approved by the Commission in Kansas Gas Service's most recent general rate proceeding; or
- b. exceed 20% of the base revenue level approved by the Commission in Kansas Gas Service's most recent general rate proceeding.

¹⁰ K.S.A. 66-2202(g) defines GSRS revenues as "revenues produced through a GSRS exclusive of revenues from all other rates and charges."

18. Ms. Van Nice testifies the Company's Petition satisfies the Act's revenue threshold requirements. The base revenue authorized for Kansas Gas Service in the 610 Docket was \$387,204,693. Because the Act uses the lesser of \$1,000,000 or 1/2% of base revenues from Kansas Gas Service's most recent general rate proceeding, the applicable GSRS revenue "floor" is \$1,000,000.¹¹ Likewise, the applicable GSRS revenue "ceiling" is \$77,440,939. Kansas Gas Service's Petition is for a total GSRS revenue requirement of \$7,207,932, thus satisfying the Act's minimum and maximum revenue threshold requirements.

D. GSRS Filing Requirements and Timelines

19. K.S.A. 66-2204(a) requires Kansas Gas Service's GSRS Petition include proposed GSRS rate schedules and supporting documentation.¹² Likewise, K.S.A. 66-2204(a) requires Kansas Gas Service serve the Citizens' Utility Ratepayer Board ("CURB") with a complete copy of this Petition. Kansas Gas Service's Petition satisfies the Act's filing requirements. Kansas Gas Service's Petition is supported by three witnesses who each sponsor and support a series of exhibits, projects, or rate schedules. In addition, Ms. Van Nice's Exhibit ACV-6 contains the Company's proposed GSRS rate schedules. Combined, these three witnesses allow the Commission to evaluate the Company's Petition, the projects contained within it, and K.S.A. 66-2204(d)'s factors for determining the appropriate pretax revenue requirement. Kansas Gas Service will serve a copy of this Petition on CURB when it is filed.

20. GSRS Petitions are not deemed to be a K.S.A. 66-117 rate increase.¹³ Rather, the Act establishes separate statutory deadlines for GSRS proceedings.¹⁴ Commission Staff must

¹¹ Ms. Van Nice testifies 1/2% of Kansas Gas Service's base revenues totals \$1,936,023.

¹² In addition to filing requirements, K.S.A. 66-2204 contains additional provisions detailing how Kansas Gas Service's GSRS resets to zero in general rate proceedings and how approval of petitions such as Kansas Gas Service's do not bind or limit future actions by the Commission. See K.S.A. 66-2204(f)(1), (h), and (i).

¹³ K.S.A. 66-2204(g).

¹⁴ K.S.A. 66-2204(b)(1)-(4).

submit a report on a GSRS petition no later than 60 days after the petition is filed.¹⁵ No other revenue requirement or ratemaking issues are considered during this review.¹⁶ Pursuant to the Act, Commission Staff's report is due Friday June 27, 2025. While the Commission has discretion to hold a hearing, the Commission must issue an order to become effective no later than 120 days after a GSRS petition is filed.¹⁷ Accordingly, a Commission order is due Tuesday, August 26, 2025.

E. GSRS Revenue Requirement

21. If a GSRS petition complies with the Act's requirements, the Commission must enter an order authorizing a GSRS sufficient to recover appropriate pretax revenue as determined by the Commission pursuant to the Act.¹⁸ Ms. Van Nice outlines the financial, accounting, and ratemaking aspects of Kansas Gas Service's GSRS Petition, and further confirms none of the costs included in this Petition were contained in Kansas Gas Service's last general rate filing (i.e., the 610 Docket).

22. Exhibit ACV-1 shows the proposed increase to rate base and the calculation of the GSRS revenue requirement. The net GSRS rate base resulting from projects identified in this Petition is \$60,688,949.

23. Exhibit ACV-1 shows the proposed GSRS revenue requirement associated with the projects identified in this Petition. As required by K.S.A. 66-2202(f)(2), Kansas Gas Service's reconciliation of previously unreconciled GSRS revenues following the 610 Docket is occurring in Docket No. 25-KGSG-268-MIS. The revenue requirement requested in this Petition is \$7,207,932.

¹⁵ See K.S.A. 66-2204(b)(2).

¹⁶ K.S.A. 66-2204(b)(2).

¹⁷ K.S.A. 66-2204(b)(3).

¹⁸ See K.S.A. 66-2204(b)(4); See also K.S.A. 66-2202(b)(1)-(3) defining appropriate pretax revenues.

24. The Unanimous Settlement Agreement approved in the 610 Docket set the carrying charge for Kansas Gas Service's GSRS Petition at 8.97%, gross of tax, based on state and federal taxes in effect as of the date of the settlement.¹⁹ As shown in Exhibit ACV-1, the Company's GSRS carrying charge is 8.97%, gross of tax, as approved in the 610 Docket.

25. Exhibits ACV-2 and ACV-3 detail the rate base calculations for the natural gas public utility plant projects identified in this Petition. The components of the rate base calculation include:

- a. gross plant (which is the original cost of all eligible projects);
- b. accumulated depreciation associated with the eligible infrastructure system investments; and
- c. accumulated deferred income taxes associated with the eligible infrastructure system investments.

26. Exhibit ACV-4 shows the calculation of depreciation expense for the natural gas public utility plant projects identified in this Petition.

F. Rate Design and Residential Rate Cap

27. Exhibit ACV-5 shows the allocation of the GSRS revenue by class. The customer class allocation is calculated pursuant to K.S.A. 66-2204(e)(1), and the Unanimous Settlement Agreement in the 610 Docket.²⁰

28. The Act establishes how GSRS charges must be allocated, and the amount a residential customer's GSRS may increase annually. Pursuant to K.S.A. 66-2204(e)(1):

A GSRS shall be charged to customers as a monthly fixed charge and not based on volumetric consumption. The monthly charge shall not increase more than \$0.80 per residential customer over the base rates in effect for the initial filing of a GSRS. Thereafter, each filing shall not increase the monthly charge more than \$0.80 per residential customer over the most recent filing of a GSRS.

¹⁹ See Order Approving Unanimous Settlement Agreement, Exhibit A, ¶ 16, Docket No. 24-KGSG-610-RTS (Oct. 3, 2024) (610 Unanimous Settlement Agreement).

²⁰ See *id.* at ¶ 17.

29. Exhibit ACV-5 shows Kansas Gas Service's GSRS Petition satisfies the Act's allocation requirements and residential charge limitation. Exhibit ACV-6 contains the revised GSRS tariff page reflecting the GSRS rates supported by this Petition.

V. CONCLUSION

30. Kansas Gas Service has continued to make safety related investments in its system and respond to public improvement projects. The costs of these eligible infrastructure system investments were prudently incurred, do not increase revenues by connecting new customers, are in service and used and required to be used, and were not included in Kansas Gas Service's most recent general rate case. The projects included in this Petition satisfy the statutory definitions of projects recoverable under a GSRS, and this Petition satisfies the statutory elements necessary to recover the costs of these projects.

WHEREFORE, for the reasons set forth herein, Kansas Gas Service respectfully requests that the Commission issue an Order approving the Petition and for any other relief the Commission deems just and reasonable.

Respectfully submitted,

/s/ Robert Elliott Vincent

Robert Elliott Vincent, KS Bar #26028

Managing Attorney

Kansas Gas Service,

a division of ONE Gas, Inc.

7421 West 129th Street

Overland Park, Kansas 66213-2634

Phone: (913) 319-8615

Fax: (913) 319-8622

E-mail: robert.vincent@onegas.com

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

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

In the Matter of the Petition of Kansas Gas)
Service, a Division of ONE Gas, Inc. for)
Approval by the Commission to Change its) DOCKET NO. 25-KGSG-____-TAR
Gas System Reliability Surcharge Per K.S.A.)
66-2201 through 66-2204.)

**DIRECT TESTIMONY
OF
JORDAN R. ROBL
ON BEHALF OF
KANSAS GAS SERVICE
A DIVISION OF ONE GAS, INC.**

APRIL 28, 2025

DIRECT TESTIMONY
OF
JORDAN R. ROBL
KANSAS GAS SERVICE
DOCKET NO. 25-KGSG-____-TAR

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Jordan R. Robl. My business address is 1021 East 26th Street North,
3 Wichita, Kansas 67219.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Kansas Gas Service, a division of ONE Gas, Inc., (“Kansas Gas
6 Service” or “Company”) as a Manager of Engineering.

7 **Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL**
8 **EXPERIENCE.**

9 A. I have a Bachelor of Science in Mechanical Engineering from Kansas State University
10 and a Master of Business Administration from Wichita State University. Upon
11 completion of my undergraduate degree in 2014, I began employment with Kansas
12 Gas Service as an entry level engineer. I was promoted to my current position in 2022.
13 I am a Licensed Professional Engineer in the State of Kansas.

14 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

15 A. Yes.

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. The purpose of my testimony is to support the eligibility of infrastructure system
18 replacement and/or enhancement projects included in Kansas Gas Service’s
19 proposed Gas System Reliability Surcharge (“GSRS”). In addition to my testimony,
20 Ms. Amy Van Nice provides direct testimony on the calculation of the GSRS revenue

1 requirement and the surcharge amounts by customer class. Additionally, Mr. Andrew
2 Copeland supports the inclusion of corporate system security investments.

3 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

4 A. Yes. I am sponsoring Exhibits JRR-1, JRR-2, JRR-3, and JRR-4. These exhibits are
5 a summary and explanation of the projects being included within the proposed GSRS.

6 **Q. PLEASE PROVIDE A BRIEF OVERVIEW OF KANSAS GAS SERVICE.**

7 A. Kansas Gas Service is a division of ONE Gas, Inc., and provides natural gas
8 distribution service to approximately 648,000 customers in more than 360
9 communities in Kansas. Approximately 592,000 of Kansas Gas Service's customers
10 are residential customers, with the remaining balance comprised of non-residential
11 general service sales customers and transportation customers. Kansas Gas Service's
12 natural gas system includes approximately 13,000 miles of distribution and
13 transmission pipelines.

14 **Q. WHAT IS A GAS SYSTEM RELIABILITY SURCHARGE?**

15 A. In 2006, Senate Bill 414, the Gas Safety and Reliability Policy Act ("Act"), was passed
16 into law. In short, the Act allows natural gas public utilities to recover expenses
17 associated with eligible infrastructure replacements incurred between rate cases
18 through a surcharge – the GSRS. Pursuant to K.S.A. 66-2203(a), as amended:

19 a natural gas public utility providing gas service may file a petition and
20 proposed rate schedules with the commission to establish or change
21 GSRS rate schedules that will allow for the adjustment of the natural
22 gas public utility's rates and charges to provide for the recovery of costs
23 for eligible infrastructure system investments.

24 In 2018, Senate Bill 279 amended the Act to expand the types of investments eligible
25 for inclusion within a GSRS.

26 **Q. HOW ARE "ELIGIBLE INFRASTRUCTURE SYSTEM INVESTMENTS" DEFINED?**

1 A. K.S.A. 66-2202(d), as amended, defines “eligible infrastructure system investments”
2 as natural gas public utility plant projects that:

3 (1) Do not increase revenues by directly connecting the infrastructure
4 investments to new customers;

5 (2) are in service and used and required to be used; and

6 (3) were not included in the natural gas public utility’s rate base in its
7 most recent general rate case.

8 **Q. HOW ARE NATURAL GAS UTILITY PLANT PROJECTS IDENTIFIED IN THE**
9 **STATUTE?**

10 A. K.S.A. 66-2202(f), as amended, outlines five separate categories of natural gas utility
11 plant projects.

12 **Q. CAN YOU OUTLINE THESE CATEGORIES?**

13 A. Yes. The first, K.S.A. 66-2202(f)(1), as amended, is for:

14 Mains, meters, valves, service lines, regulator stations, vaults and other
15 pipeline system components installed to replace, upgrade or modernize
16 obsolete facilities, including, but not limited to, installation to comply
17 with state or federal safety requirements replacing existing facilities.

18 The second, K.S.A. 66-2202(f)(2), as amended, is for:

19 Main relining projects, service line insertion projects, joint
20 encapsulation projects and other similar projects extending the useful
21 life or enhancing the integrity of pipeline system components including,
22 but not limited to, projects undertaken to comply with state or federal
23 safety requirements.

24 The third, K.S.A. 66-2202(f)(3), as amended, is for:

25 Facility relocations required due to construction or improvement of a
26 highway, road, street, public way or other public work by or on behalf

1 of the United States, this state, a political subdivision of this state or
2 another entity having the power of eminent domain provided that the
3 costs related to such projects have not been reimbursed to the natural
4 gas public utility.

5 The fourth, K.S.A. 66-2202(f)(4), as amended, is for:

6 System security costs including allocated corporate costs incurred by a
7 natural gas public utility.

8 The fifth, K.S.A. 66-2202(f)(5), as amended, is for:

9 Investments made in accordance with the utility's safety and risk
10 management programs.

11 **Q. IS THERE A WAY TO GENERALLY CLASSIFY THESE TYPES OF PROJECTS?**

12 A. Yes. Categories 1, 2, 4 and 5 identified above are generally classified under the
13 heading of a safety related project within this Petition, while category 3 is generally
14 classified as a public improvement project. Company witness Mr. Copeland will be
15 discussing a subset of projects classified under category 4, related to system security
16 projects.

17 **Q. WHAT KINDS OF PROJECTS ARE INCLUDED IN KANSAS GAS SERVICE'S**
18 **GSRS PROPOSAL?**

19 A. Exhibit JRR-1, as attached hereto, identifies safety related projects recoverable under
20 K.S.A. 66-2202(f)(1), (f)(2), (f)(4), and (f)(5), as amended. Exhibit JRR-2, as attached
21 hereto, identifies governmental relocation projects recoverable under K.S.A. 66-
22 2202(f)(3), as amended. Both exhibits provide a project description, work order
23 number, unitization date, and cost for each of the projects. The project list contained
24 in Exhibit JRR-1, also includes a reference to the compliance section of state or federal
25 pipeline safety requirements where applicable. Similarly, the governmental relocation
26 project list identifies the governmental entity requiring the relocation activity. The

1 projects identified in Exhibits JRR-1 and JRR-2 were unitized between May 1, 2024,
2 and February 28, 2025.

3 **Q. PLEASE EXPLAIN EXHIBIT JRR-3.**

4 A. Exhibit JRR-3, as attached hereto, identifies projects that have been accounted for as
5 blanket work orders for service line replacement projects and a limited group of non-
6 service line projects. Blanket work orders are used to account for costs of projects
7 with relatively small dollar amounts and which are relatively similar. Expenses related
8 to the replacement of service lines meets both criteria and are therefore included in
9 blanket work orders. These service line replacement projects are small projects where
10 the Company has replaced the service line from the main in the street to the house as
11 a result of either a safety concern or a public improvement project. As such, these
12 projects are eligible for recovery under K.S.A. 66-2202(f)(1) or (3) in the same manner
13 as projects identified in Exhibits JRR-1 and JRR-2. The projects identified in Exhibit
14 JRR-3 were unitized between May 1, 2024, and February 28, 2025.

15 **Q. PLEASE EXPLAIN EXHIBIT JRR-4.**

16 A. The Commission's Order in the Company's initial GSRS filing, Docket No. 09-KGSG-
17 199-TAR ("199 Docket"), directed Kansas Gas Service to provide an expanded
18 explanation of projects included in the Company's GSRS pursuant to 49 C.F.R. §
19 192.613.¹ Exhibit JRR-4, as attached hereto, provides the explanation for those
20 projects identified in Exhibit JRR-1 that reference 49 C.F.R. § 192.613. I provide an
21 explanation of the applicability of this section to service line replacements later in my
22 testimony.

¹ "If KGS uses Title 49 C.F.R. Part 192.613 as the criteria for projects meeting this definition, then the GSRS Application shall include documentation supporting the determination that the projects were in "unsatisfactory condition" and therefore applicable for inclusion under Title 49 C.F.R. Part 192.613." Order, Docket No. 09-KGSG-199-TAR, Ordering Clause (A) (Dec. 18, 2008). See *also* id. at ¶6.

1 **Q. WHEN WERE THE PROJECTS INCLUDED IN EXHIBITS JRR-1, JRR-2 AND JRR-**
2 **3 COMPLETED?**

3 A. The projects included in Exhibits JRR-1, JRR-2, and JRR-3 were unitized and included
4 on the books as “plant in service” during the period beginning on May 1, 2024, through
5 February 28, 2025. As referenced in Ms. Van Nice’s testimony, none of the costs
6 included in Exhibits JRR-1, JRR-2, and JRR-3 were included in Kansas Gas Service’s
7 base rates from its most recent general rate case – Docket No. 24-KGSG-610-RTS
8 (“610 Docket”).

9 **Q. GENERALLY, WHAT SAFETY RELATED REGULATIONS ARE REFERENCED BY**
10 **KANSAS GAS SERVICE IN CONSIDERING A PROJECT’S INCLUSION IN THIS**
11 **GSRs FILING?**

12 A. The referenced regulations are contained in 49 CFR Part 192, *Transportation of*
13 *Natural and Other Gas by Pipeline: Minimum Federal Safety Standards*, and those
14 Kansas Administrative Regulations (“K.A.R.s”) applicable to jurisdictional natural gas
15 pipelines within the State of Kansas.

16 **Q. SPECIFICALLY, WHAT REGULATIONS ARE ASSOCIATED WITH THE SAFETY-**
17 **RELATED REPLACEMENT PROJECTS IN THIS FILING?**

18 A. Each project identified in Exhibit JRR-1, attached hereto, was undertaken to comply
19 with state or federal safety requirements. The column marked “Regulation” in Exhibit
20 JRR-1 identifies the regulations from Title 49 of the Code of Federal Regulations,
21 which were adopted by the Commission in K.A.R. 82-11-4, when applicable. Among
22 the applicable regulations are 49 C.F.R. §§ 192.455, 192.457, 192.487, and 192.613.
23 Also referenced in JRR-1, are certain Commission dockets that address safety such
24 as Docket Nos. 11-KGSG-177-TAR, 12-KGSG-721-TAR, 14-KGSG-100-MIS,
25 15-GIMG-343-GIG (“15-343 Docket”), and 18-KGSG-317-CPL (“18-317 Docket”). I

1 **Q. WHAT TYPES OF PROJECTS ARE INCLUDED IN EXHIBIT JRR-1 OF KANSAS**
2 **GAS SERVICE'S GSRS APPLICATION?**

3 A. There are seven categories of projects included in Kansas Gas Service's request in
4 Exhibit JRR-1. The total expenditure for all projects is \$23,950,780. These categories
5 consist of:

- 6 1) BARE STEEL MAIN REPLACEMENT;
7 2) BARE STEEL SERVICE LINE REPLACEMENT;
8 3) CATHODIC PROTECTION;
9 4) CONTINUING SURVEILLANCE;
10 5) PHYSICAL SECURITY;
11 6) PIPELINE SYSTEM COMPONENTS; and
12 7) PRESSURE AND MEASUREMENT (OBSCOLESCENCE).

13 **Q. PLEASE EXPLAIN THE CATEGORY IDENTIFIED AS "BARE STEEL MAIN**
14 **REPLACEMENT."**

15 A. Senate Bill No. 279, among other things, amended K.S.A. 66-2202(f)(1) to include
16 projects that replaced, upgraded, or modernized obsolete facilities – including
17 installations replacing existing facilities necessary to comply with state or federal
18 safety requirements. Kansas Gas Service is replacing bare steel mains which are
19 deemed obsolete. Mains are specifically identified in K.S.A. 66-2202(f)(1), as
20 amended. Kansas Gas Service is following section 1600 of its Operations and
21 Maintenance Standards to prioritize replacement work. The total capital expenditure
22 for the Bare Steel Main Replacements identified in Exhibit JRR-1 is \$15,663,143.

23 **Q. PLEASE EXPLAIN THE CATEGORY IDENTIFIED AS "BARE STEEL SERVICE**
24 **LINE REPLACEMENT".**

25 A. Pursuant to Docket No. 11-KGSG-177-TAR ("177 Docket") and Senate Bill No. 279,
26 which among other things, amended K.S.A. 66-2202(f)(1) and was summarized

1 A. Pursuant to Docket No. 11-KGSG-177-TAR (“177 Docket”) and Senate Bill No. 279,
2 which among other things, amended K.S.A. 66-2202(f)(1) and was summarized
3 above, Kansas Gas Service is replacing bare steel service lines which are deemed
4 obsolete. Service lines are specifically identified in K.S.A. 66-2202(f)(1), as amended.
5 Kansas Gas Service is following section 1600 of its Operations and Maintenance
6 Standards to prioritize replacement work. The total capital expenditure for the Bare
7 Steel Service Replacement identified in Exhibit JRR-1 is \$389,181.

8 **Q. HAS KGS REPLACED ALL ITS RESIDENTIAL BARE STEEL SERVICE LINES?**

9 A. Yes. KGS has replaced all the known residential bare steel service lines in its
10 distribution system. In Docket No. 23-KGSG-237-CON, KGS acquired customers
11 directly connected to the transmission system operated by Southern Star Central Gas
12 Pipeline, Inc. (“Southern Star”). The Commission’s July 16, 2024, order approving the
13 acquisition established a five-year timeframe to replace any applicable bare steel
14 service or yard lines, and KGS is replacing these service and yard lines in accordance
15 with this schedule.

16 **Q. WILL KGS CONTINUE TO REPLACE BARE STEEL SERVICE LINES?**

17 A. Yes. As KGS moves forward with its Obsolete Infrastructure Replacement Program
18 established in the 15-343 Docket, annually updated in the 18-317 Docket, KGS will
19 transition to the replacement of non-residential bare steel service lines. These
20 replacements will take place consistent with the pace noted in the Obsolete
21 Infrastructure Replacement program.

22 **Q. PLEASE EXPLAIN THE CATEGORY IDENTIFIED AS “CATHODIC PROTECTION.”**

23 A. 49 C.F.R. § 192.457, along with its Kansas adoption K.A.R. 82-11-4(b)(14), requires
24 pipelines installed prior to August 1, 1971, be cathodically protected in areas where
25 active corrosion is found. The job activities identified in Exhibit JRR-1, under the
26 heading Cathodic Protection, represent projects undertaken by Kansas Gas Service

1 that involve the cathodic protection of our facilities. These activities are required by
2 regulation and reduce the possibility of corrosion of pipes, thereby significantly
3 reducing the chance for leaks and risk to the general public. Many of these project
4 tasks were performed pursuant to 49 C.F.R. § 192.457 for pipelines installed prior to
5 August 1, 1971. A portion of the pipeline projects were also performed pursuant to 49
6 C.F.R. § 192.455, along with its Kansas adoption K.A.R. 82-11-4(b)(13), as certain
7 sections of the identified segments have had main sections replaced after August 1,
8 1971. The activities identified in these projects included the installation of new facilities
9 that we determined to more efficiently reduced corrosion on the pipelines. The total
10 capital expenditure for the Cathodic Protection projects identified in Exhibit JRR-1 is
11 \$518,306.

12 **Q. PLEASE EXPLAIN THE CATEGORY IDENTIFIED AS “CONTINUING**
13 **SURVEILLANCE.”**

14 A. 49 C.F.R. § 192.613, as adopted by K.A.R. 82-11-4, requires each operator to have a
15 procedure for continuing surveillance of its facilities to determine and take appropriate
16 action concerning changes in class location, failures, leakage history, corrosion,
17 substantial changes in cathodic protection requirements, and other unusual operating
18 and maintenance conditions. The rule also requires that if a segment of pipe is
19 determined to be in unsatisfactory condition (but no immediate hazard exists), the
20 operator shall initiate a program to recondition or phase out the segment involved.
21 However, if the segment cannot be reconditioned or phased out, the operator shall
22 reduce the maximum allowable operating pressure in accordance with 49 C.F.R. §
23 192.619(a) and (b), as adopted by K.A.R. 82-11-4. The job activities identified in
24 Exhibit JRR-1, under the heading of Continuing Surveillance, represent projects
25 undertaken by Kansas Gas Service that involve phasing out pipe segments
26 determined to be in unsatisfactory condition but where no immediate hazard exists.

1 The total capital expenditure for the Continuing Surveillance projects identified in
2 Exhibit JRR-1 is \$4,717,790.

3 **Q. PLEASE DISCUSS THE PROJECTS UNDER THE CATEGORY “PHYSICAL**
4 **SECURITY.”**

5 A. Senate Bill No. 279, among other things, created K.S.A. 66-2202(f)(4). Pursuant to
6 this section, system security costs incurred by a natural gas public utility may be
7 included in a GSRS filing. K.S.A. 66-2202(i) defines “system security,” in part, as
8 “capital expenditures to protect a utility’s capital assets, including both physical assets
9 and cyber assets.” Projects identified in Exhibit JRR-1 as “Physical Security” are those
10 projects the Company undertook to protect physical assets. The investments were
11 made to implement electronic security measures by adding access control,
12 surveillance, intrusion detection, fencing, lighting and secure cabinet enclosures. The
13 total capital expenditure related to physical security investments is \$16,898.

14 **Q. PLEASE DISCUSS THE PROJECTS INCLUDED UNDER THE CATEGORY**
15 **“PIPELINE SYSTEM COMPONENTS.”**

16 A. Pursuant to Senate Bill No. 279, which among other things, amended K.S.A. 66-
17 2202(f)(1) and was summarized above, Kansas Gas Service is replacing pipeline
18 system components, such as odorizers and compressor valves that are obsolete. The
19 total capital expenditure for Pipeline System Component(s) replacement identified in
20 Exhibit JRR-1 is \$2,235,085.

21 **Q. PLEASE EXPLAIN THE PROJECTS LISTED UNDER CATEGORY “PRESSURE**
22 **AND MEASUREMENT (OBSCOLESCENCE).”**

23 A. Pursuant to Senate Bill No. 279, which among other things, amended K.S.A. 66-
24 2202(f)(1) and was summarized above, Kansas Gas Service is replacing pipeline
25 system components, such as meters and regulators needed for ongoing operations.

1 The total capital expenditure for Pressure & Measurement components identified in
2 Exhibit JRR-1 is \$410,377.

3 **Q. PLEASE PROVIDE AN EXPLANATION FOR EXHIBIT JRR-2 RELATING TO**
4 **GOVERNMENTALLY MANDATED RELOCATION PROJECTS.**

5 A. Exhibit JRR-2 identifies each governmentally mandated relocation project included in
6 this GSRS filing. Exhibit JRR-2 provides a description and location of the project, the
7 unitization date of the project, the cost of the project, and the governmental entity
8 which required the relocation of our facilities. The total expenditure for all projects
9 identified in Exhibit JRR-2 is \$6,388,113.

10 **Q. PLEASE PROVIDE FURTHER DETAILS REGARDING THE COMPANY'S SERVICE**
11 **LINE REPLACEMENT PROGRAM IDENTIFIED IN EXHIBIT JRR-3.**

12 A. As stated above, the projects in this category relate to the replacement of service lines
13 from the main in the street to the house. These service line replacements have been
14 implemented for safety and public improvement reasons. The safety related reasons
15 are two-fold. The service lines themselves may need to be replaced because of
16 deficiencies in the service line such as leaks or corrosion. The service lines are also
17 replaced for safety related reasons tied to safety related replacements of the main in
18 the streets. For example, if a main must be replaced as part of Kansas Gas Service's
19 3-5-3 program, it becomes necessary to also replace the steel unprotected service
20 lines and reconnect existing Polyethylene ("PE") service lines. When the main is
21 replaced in the street, the existing service line is disconnected and thus is no longer
22 useful unless reconnected. Typically, the cost to cathodically protect and reconnect
23 the steel unprotected service line to the new main will exceed the cost of simply
24 installing a new service line. Similar to the replacement of a service line due to
25 replacement of a main for safety reasons, service lines are also replaced when the
26 main is relocated as a result of a government mandated road relocation project. In

1 these situations, the main must be replaced as well as replacing or extending the
2 existing service lines which have been rendered useless through being disconnected
3 from the old main as a result of the road relocation. Again, the cost to cathodically
4 protect and reconnect steel unprotected service lines to the new main will exceed the
5 cost of simply installing a new PE service line.

6 **Q. PLEASE EXPLAIN THE STRUCTURE OF EXHIBIT JRR-3.**

7 A. In the box under the heading “Blanket Service Line Summary,” I have listed the
8 categories supporting the service line replacements. If a service line replacement is
9 due to a safety related requirement, the applicable safety related code requirement is
10 listed. If the service line replacement is due to a Public Improvement project, I have
11 identified it as such. Exhibit JRR-3 then sets forth the dollar value and number of
12 service lines replaced by year and category. For example, the “Routine Replacement
13 – Leak” category had \$ 476,652 in service line replacement costs involving 78 service
14 lines. In the box under the heading “Non-Service Line Related Blanket Summary,”
15 there are four categories of blanket non-service line projects which I will explain below.

16 **Q. PLEASE EXPLAIN EACH OF THE SERVICE LINE REPLACEMENT CATEGORIES**
17 **IDENTIFIED IN EXHIBIT JRR-3.**

18 A. I have placed the safety related service line replacements at the beginning of the
19 Blanket Service Line Summary in Exhibit JRR-3 and service line replacements for
20 public improvements at the bottom of the Blanket Service Line Summary. The first
21 safety category, “Routine Replacement-Leak”, includes the replacement of service
22 lines that were replaced due to leakage classified under the leak classification
23 guidelines found in 49 C.F.R. § 192.703 (and subject to 49 C.F.R. § 192.453(b)), and
24 their respective Kansas regulations. These regulations require unprotected steel
25 service lines found to have active corrosion be either protected or replaced. As shown

1 in Exhibit JRR-3, during the period beginning May 1, 2024 through February 28, 2025,
2 78 service lines were replaced at a cost of \$476,652.

3 **Q. PLEASE EXPLAIN THE “ROUTINE REPLACEMENT – NON-LEAKING**
4 **UNPROTECTED PIPE” CATEGORY.**

5 A. This category includes replacement of unprotected steel service lines that were not
6 leaking. The unprotected steel service lines were replaced to comply with various
7 regulations including 49 C.F.R. § 192.613(b), as adopted by K.A.R. 82-11-4, which
8 requires piping found to be unsatisfactory be phased out or replaced. Replacement
9 reasons include issues such as:

- 10 • The service line’s tap was exposed during maintenance of main and corrosion
11 was found requiring replacement pursuant to 49 C.F.R. § 192.453(b), as
12 adopted by K.A.R. 82-11-4;
- 13 • The service line was exposed during pot-holing and corrosion was found
14 requiring replacement per 49 C.F.R. § 192.453(b), as adopted by K.A.R. 82-
15 11-4;
- 16 • The service line was under the influence of soil subsidence found through
17 patrolling and required replacement pursuant to 49 C.F.R. § 192.721, as
18 adopted by K.A.R. 82-11-4; and
- 19 • The current location of the service line was found to be too shallow and
20 required replacement pursuant to 49 C.F.R. § 192.613, as adopted by K.A.R.
21 82-11-4.

22 All service lines included in this category are subject to 49 C.F.R. § 192.453, as
23 adopted by K.A.R. 82-11-4, which will inevitably trigger replacement of all unprotected
24 steel lines by regulation. These service lines were also replaced pursuant to the
25 Commission’s Order in the 177 Docket, in accordance with the service line

1 replacement program. As shown in Exhibit JRR-3, during the period beginning May
2 1, 2024 through February 28, 2025, the Company replaced 1,489 service lines at a
3 cost of \$9,099,156.

4 **Q. PLEASE EXPLAIN THE “PUBLIC IMPROVEMENT” CATEGORY.**

5 A. As explained in my testimony above related to Exhibit JRR-2, government mandated
6 relocation projects require the Company to relocate its mains in the street. The costs
7 of government mandated relocation projects are recoverable pursuant to K.S.A. 66-
8 2202(f)(3). When performing main relocation (which is the installation of new main)
9 Kansas Gas Service will install new service line piping to reconnect existing plastic
10 services and will also replace the unprotected steel service lines with new plastic
11 service lines. These service line replacements may have also resulted from a direct
12 conflict with a governmental relocation project where no conflict existed with the main
13 piping. In these cases, only the service line needed to be replaced, whereas the main
14 did not need to be replaced. As shown in Exhibit JRR-3, during the period May 1,
15 2024 through February 28, 2025, Kansas Gas Service replaced 8 service lines at a
16 cost of \$48,887.

17 **Q. PLEASE EXPLAIN THE CATEGORIES IN THE BOX FOR “NON-SERVICE LINE**
18 **RELATED BLANKET.”**

19 A. These blanket costs address small projects other than service lines. The first group,
20 “install anodes,” is GSRS eligible pursuant to K.S.A. 66-2202(f)(1), as amended, and
21 49 C.F.R. §§ 192.455 and 192.457, as adopted by K.A.R. 82-11-4. The total capital
22 expenditure for these projects is \$1,175,054. These anodes represent projects which
23 involve ten anodes or less and thus are included in a blanket work order. The other
24 category, “Weld Sleeve High Resist Couplings” includes installation of weld sleeves
25 over high resistance couplings which are required pursuant to either 49 C.F.R. §§
26 192.457 or 192.455, as adopted by K.A.R. 82-11-4, to reduce the possibility of

1 corrosion of pipes, thereby significantly reducing the chance for leaks and risk to the
2 general public. The total capital expenditure for these projects is \$292,980.

3

4 The last two categories are related to meter replacement programs. First, Kansas Gas
5 Service includes meter costs related to our meter changeout program. Pursuant to
6 Kansas Gas Service's General Terms and Condition Section 9.02.03, Kansas Gas
7 Service is required to routinely test its meters. Kansas Gas Service uses a meter
8 sampling program to determine which meters need to be replaced because of possible
9 inaccuracy and failures to meet current industry standards. The total capital
10 expenditure for these projects is \$11,453,246. Second, Kansas Gas Service is
11 replacing the obsolete Cellnet devices in the Kansas City Metro Area with Automatic
12 Meter Reading devices. The total capital expenditure included for this program is
13 \$8,698,015.

14 **Q. CAN YOU PLEASE EXPLAIN EXHIBIT JRR-4?**

15 A. Exhibit JRR-4 sets forth the applicability of section 49 C.F.R. § 192.613, as adopted
16 by K.A.R. 82-11-4, to those safety related projects identified in Exhibit JRR-1. There
17 are thirty five (35) projects that are identified in JRR-1, whose inclusion as a safety
18 related project is eligible for recovery in whole or in part under K.S.A. 66-2202(f)(1),
19 as amended, pursuant to 49 C.F.R. § 192.613, as adopted by K.A.R. 82-11-4.

20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

21 A. Yes, it does at the current time.

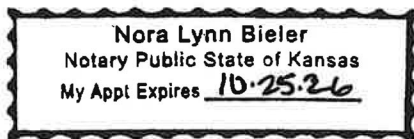
VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

Jordan R. Robl, being duly sworn upon his oath, deposes and states that he is Manager of Engineering for Kansas Gas Service, a Division of ONE Gas, Inc.; that he has read and is familiar with the foregoing Direct Testimony filed herewith; and that the statements made therein are true to the best of his knowledge, information, and belief.


JORDAN R. ROBL

Subscribed and sworn to before me this 22nd day of April, 2025.




NOTARY PUBLIC

My Appointment Expires:

10-25-26

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
1	Bare Steel Main Replacement	K.S.A. 66-2202 / 192.613 (b)	10/29/2024	3541	054	010802	Install 160' 2" PE. Retire 150' 2" RPBS. 305 S Palmberg, Meriden KS. This work is to resolve a temporary repair for a leak. Main was too thin to weld on when the leak repair was performed, this replaced the whole section with new main.	3760	\$5,027
2	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3643	054	010081	Bare Steel Main Replacement - Starr & Spruce, Miltonvale - Retire 1,700' of 2" APBS, 250' of 2" APCS, and 150' of 1 1/4" PE as part of the planned work projects included in the 2nd release from 2023. Install 2,200' of 2" PE main.	3760	\$122,008
3	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3643	054	010081	Bare Steel Main Replacement - Starr & Spruce, Miltonvale - Retire 1,700' of 2" APBS, 250' of 2" APCS, and 150' of 1 1/4" PE as part of the planned work projects included in the 2nd release from 2023. Install 2,200' of 2" PE main.	3769	\$807
4	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3643	054	010081	Bare Steel Main Replacement - Starr & Spruce, Miltonvale - Retire 1,700' of 2" APBS, 250' of 2" APCS, and 150' of 1 1/4" PE as part of the planned work projects included in the 2nd release from 2023. Install 2,200' of 2" PE main.	3800	\$9,805
5	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3643	054	010084	BS Main Abandonment - Ash & NW 6th, Miltonvale - Retire 221' of 1.25" APBS main & 6' of 1.25" APCS main due to Dresser coupling leaking on the outlet of the saddle fitting supplying gas to the 1.25" BS mains. 2 PE Service Lines Affected Tie Over Services to Parallel Main Across the Street	3769	\$207
6	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3643	054	010084	BS Main Abandonment - Ash & NW 6th, Miltonvale - Retire 221' of 1.25" APBS main & 6' of 1.25" APCS main due to Dresser coupling leaking on the outlet of the saddle fitting supplying gas to the 1.25" BS mains. 2 PE Service Lines Affected Tie Over Services to Parallel Main Across the Street	3800	\$3,014
7	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3643	054	010084	BS Main Abandonment - Ash & NW 6th, Miltonvale - Retire 221' of 1.25" APBS main & 6' of 1.25" APCS main due to Dresser coupling leaking on the outlet of the saddle fitting supplying gas to the 1.25" BS mains. 2 PE Service Lines Affected Tie Over Services to Parallel Main Across the Street	3820	\$455
8	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3643	054	010084	BS Main Abandonment - Ash & NW 6th, Miltonvale - Retire 221' of 1.25" APBS main & 6' of 1.25" APCS main due to Dresser coupling leaking on the outlet of the saddle fitting supplying gas to the 1.25" BS mains. 2 PE Service Lines Affected Tie Over Services to Parallel Main Across the Street	3830	\$2
9	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3653	054	010165	Install 90' 4" PE, 350' 2" PE. Retire 150' 2" BS, 400' 4" BS, 155' 4" CS. E 1st St and C St, Washington KS. This project is to address a leak just east of C St along E 1st St. The district regulator station to the north of 1st was abandoned as well to allow for more bare steel main replacement.	3760	\$44,074
10	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3653	054	010165	Install 90' 4" PE, 350' 2" PE. Retire 150' 2" BS, 400' 4" BS, 155' 4" CS. E 1st St and C St, Washington KS. This project is to address a leak just east of C St along E 1st St. The district regulator station to the north of 1st was abandoned as well to allow for more bare steel main replacement.	3769	\$1,060
11	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3653	054	010165	Install 90' 4" PE, 350' 2" PE. Retire 150' 2" BS, 400' 4" BS, 155' 4" CS. E 1st St and C St, Washington KS. This project is to address a leak just east of C St along E 1st St. The district regulator station to the north of 1st was abandoned as well to allow for more bare steel main replacement.	3800	\$4,343
12	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3653	054	010165	Install 90' 4" PE, 350' 2" PE. Retire 150' 2" BS, 400' 4" BS, 155' 4" CS. E 1st St and C St, Washington KS. This project is to address a leak just east of C St along E 1st St. The district regulator station to the north of 1st was abandoned as well to allow for more bare steel main replacement.	3820	\$1,421
13	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3653	054	010165	Install 90' 4" PE, 350' 2" PE. Retire 150' 2" BS, 400' 4" BS, 155' 4" CS. E 1st St and C St, Washington KS. This project is to address a leak just east of C St along E 1st St. The district regulator station to the north of 1st was abandoned as well to allow for more bare steel main replacement.	3830	\$5
14	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3653	054	010172	Install 135' 2" PE, 275' 4" PE. Retire 348' 2" BS, 62' 4" BS. S 3rd St and Broadway St, Marysville KS. This project is a system reinforcement to address flow issues through existing zin and replaces bare steel main in the process.	3760	\$50,310
15	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3653	054	010172	Install 135' 2" PE, 275' 4" PE. Retire 348' 2" BS, 62' 4" BS. S 3rd St and Broadway St, Marysville KS. This project is a system reinforcement to address flow issues through existing zin and replaces bare steel main in the process.	3765	\$143
16	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3653	054	010172	Install 135' 2" PE, 275' 4" PE. Retire 348' 2" BS, 62' 4" BS. S 3rd St and Broadway St, Marysville KS. This project is a system reinforcement to address flow issues through existing zin and replaces bare steel main in the process.	3800	\$615
17	Bare Steel Main Replacement	K.S.A. 66-2202	3/3/2025	3651	054	010178	Install 1600' 8" CS. Retire 1600' 8" BS. Clafin Rd Between College and Hylton Heights, Manhattan KS. This work is a planned work project to replace a section of bare steel high pressure distribution main.	3765	\$409,745
18	Bare Steel Main Replacement	K.S.A. 66-2202	3/3/2025	3651	054	010178	Install 1600' 8" CS. Retire 1600' 8" BS. Clafin Rd Between College and Hylton Heights, Manhattan KS. This work is a planned work project to replace a section of bare steel high pressure distribution main.	3769	\$2,221
19	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3651	054	010181	Install 1420' 2" PE. Retire 610' 2" BS. Sunset Ave Between College Heights and Hunting, Manhattan KS. This project is to replace exposed bare steel main found in a rear easement due to erosion. Main was relocated out to the road to avoid future erosion.	3760	\$91,786
20	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3651	054	010181	Install 1420' 2" PE. Retire 610' 2" BS. Sunset Ave Between College Heights and Hunting, Manhattan KS. This project is to replace exposed bare steel main found in a rear easement due to erosion. Main was relocated out to the road to avoid future erosion.	3769	\$2,346
21	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3651	054	010181	Install 1420' 2" PE. Retire 610' 2" BS. Sunset Ave Between College Heights and Hunting, Manhattan KS. This project is to replace exposed bare steel main found in a rear easement due to erosion. Main was relocated out to the road to avoid future erosion.	3800	\$70,387
22	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3532	054	010316	BS Main Replacement - 510 N 9th, Hiawatha - Retire 375' of 2" BS main with significant pitting and pipe wall loss. Install 375' of 2" PE main. NPL will replace 375' - 2" bare steel main with 375' - 2" PE in the west row of 510 N. 9th.	3760	\$4,900
23	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3532	054	010316	BS Main Replacement - 510 N 9th, Hiawatha - Retire 375' of 2" BS main with significant pitting and pipe wall loss. Install 375' of 2" PE main. NPL will replace 375' - 2" bare steel main with 375' - 2" PE in the west row of 510 N. 9th.	3800	\$15,785
24	Bare Steel Main Replacement	K.S.A. 66-2202	2/28/2025	3532	054	010321	BS Main Replacement - 5th & Dakota, Holton - Retire 1,213' of 2" BS, 32' of 2" CS, and 37' of 2" PE main included in the third release of planned work projects for 2023. Install 1,290' of 2" PE main.	3760	\$57,610
25	Bare Steel Main Replacement	K.S.A. 66-2202	2/28/2025	3532	054	010321	BS Main Replacement - 5th & Dakota, Holton - Retire 1,213' of 2" BS, 32' of 2" CS, and 37' of 2" PE main included in the third release of planned work projects for 2023. Install 1,290' of 2" PE main.	3800	\$7,424
26	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3532	054	010323	BS Main Replacement - 320 W 2nd, Holton - Retire 4' of 2" RPBS and 4' of 2" RPCS main due to leak on existing segment and to keep continuity with rectifier current. Install 15' of 2" CS main. Install 664' - 2" PE, Abandon 540' - 2" RPBSNPL will replace the 2" BS main and drag the #2 cables to the new main to keep the rectifier connected.	3765	\$21,538
27	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3831	054	010343	BS Main Replacement - 1310S 220th, Erie - Retire 195' of 6" RPBS main due to leak on existing main segment. Install 200' of 6" RPBS main.	3765	\$85,534
28	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3831	054	010344	BS Main Replacement - Idaho & 15th, Moran - Retire 295' of 3" UPBS main due to leak on existing main segment. Install 300' of 4" APCS main.	3765	\$47,444
29	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3831	054	010344	BS Main Replacement - Idaho & 15th, Moran - Retire 295' of 3" UPBS main due to leak on existing main segment. Install 300' of 4" APCS main.	3769	\$2,234
30	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3621	054	010345	Scope Of Work: Install: 500' of 4" PE Main and 725' of 2" PE Main Retire: 1408' of 4" BS Main, 11' of 2" BS Main and 90' of 4" CS Main	3760	\$86,032
31	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3621	054	010345	Scope Of Work: Install: 500' of 4" PE Main and 725' of 2" PE Main Retire: 1408' of 4" BS Main, 11' of 2" BS Main and 90' of 4" CS Main	3800	\$2,753
32	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3621	054	010345	Scope Of Work: Install: 500' of 4" PE Main and 725' of 2" PE Main Retire: 1408' of 4" BS Main, 11' of 2" BS Main and 90' of 4" CS Main	3820	\$3,162
33	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3621	054	010345	Scope Of Work: Install: 500' of 4" PE Main and 725' of 2" PE Main Retire: 1408' of 4" BS Main, 11' of 2" BS Main and 90' of 4" CS Main	3830	\$395
34	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3831	054	010345	BS Main Replacement - 15th & Gabriel, Parsons - Retire 985' of 2" UPBS, 250' of 2" PE, and 46' of 1.25" PE main. Install 920' of 2" PE main	3760	\$51,888

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
35	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3831	054	010345	BS Main Replacement - 15th & Gabriel, Parsons - Retire 985' of 2" UPBS, 250' of 2" PE, and 46' of 1.25" PE main. Install 920' of 2" PE main	3800	\$13,054
36	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3831	054	010347	BS Main Replacement - 2200th & Oregon Rd, Iola - Retire 315' of 3" UPBS main attached to a bridge and received damaged from recent flood waters. Install 350' of 2" PE main.	3760	\$50,306
37	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3621	054	010363	Main Retirement- W 7th St & N Saint John St- Retire 166' of 2" CS, 162' of 2" BS, 50' of 2" PE, 51' of 1 1/4" BS and 99' of 1 1/4" BS main due to a CP deficiency.	3800	\$275
38	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3621	054	010363	Main Retirement- W 7th St & N Saint John St- Retire 166' of 2" CS, 162' of 2" BS, 50' of 2" PE, 51' of 1 1/4" BS and 99' of 1 1/4" BS main due to a CP deficiency.	3820	\$409
39	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3621	054	010363	Main Retirement- W 7th St & N Saint John St- Retire 166' of 2" CS, 162' of 2" BS, 50' of 2" PE, 51' of 1 1/4" BS and 99' of 1 1/4" BS main due to a CP deficiency.	3830	\$58
40	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3621	054	010364	BS Main Replacement - State Ave & W 8th St, Larned - Retire 170' of 3" APBS main due to shallow pipe, damaged, leaking, corroded, and having a low pipe to soil read. Install 170' of 4" PE main.	3760	\$18,842
41	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3621	054	010364	BS Main Replacement - State Ave & W 8th St, Larned - Retire 170' of 3" APBS main due to shallow pipe, damaged, leaking, corroded, and having a low pipe to soil read. Install 170' of 4" PE main.	3800	\$210
42	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3621	054	010366	BS Main Replacement - 3121 Broadway Ave, Great Bend - Retire 70' of 2" APBS with inadequate wall thickness for completing a permanent repair. Install 70' of 2" PE main.	3760	\$4,893
43	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3621	054	010366	BS Main Replacement - 3121 Broadway Ave, Great Bend - Retire 70' of 2" APBS with inadequate wall thickness for completing a permanent repair. Install 70' of 2" PE main.	3800	\$678
44	Bare Steel Main Replacement	K.S.A. 66-2202	8/28/2024	3761	054	010368	Bare steel main replacement - PW - 23R3 - Pittsburg - Broadway and Williams - Retire 360' of 4" APBS, install 400' of 2" PE main	3760	\$46,382
45	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3621	054	010369	BS Main Replacement - E 8th St and Niles Ave, Kinsley - Retire 80' of 4" RPBS main due to leak on existing main segment. Install 80' of 4" CS main to permanently repair and replace the clamped leak.	3765	\$11,238
46	Bare Steel Main Replacement	K.S.A. 66-2202	8/28/2024	3622	054	010369	BS Main Replacement- 340 N Marquette, Kingman - Retire 13' of 2" BS Main to permanently repair a leaking Dresser coupling. Install 13' of 2" CS main	3765	\$4,109
47	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3761	054	010369	BS Main Replacement - 510 E Main, Weir - Retire 235' of 2" RPBS main to permanently repair and replace a clamped leak on exiting main segment. Install 240' of 2" PE main.	3760	\$12,929
48	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3622	054	010372	BS Main Replacement - 306 N Lincoln, Greensburg - Retire 10' of 2" RPBS and 40' of 1.25" RPCS main due to corrosion leak on existing main segment. Install 10' of 2" CS main	3765	\$1,894
49	Bare Steel Main Replacement	K.S.A. 66-2202	10/15/2024	3761	054	010372	BS Main Replacement - 1002 W 6th, Pittsburg - Retire 145' of 2" UPBS main to permanently repair and replace multiple clamped leaks on existing main segment. Install 150' of 2" PE main.	3760	\$4,327
50	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3622	054	010373	BS Main Replacement - Pennsylvania and Walnut, Greensburg - Retire 250' OF 4" BS" RPBS, 438' of 2" CS, 160' of 2" BS and 100' of 1.25" CS main due to an obsolete rectifier and depleted goundbed no longer providing adequate cathodic protection for steel main. Install 500' of 2" PE main.	3760	\$7,674
51	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3622	054	010373	BS Main Replacement - Pennsylvania and Walnut, Greensburg - Retire 250' OF 4" BS" RPBS, 438' of 2" CS, 160' of 2" BS and 100' of 1.25" CS main due to an obsolete rectifier and depleted goundbed no longer providing adequate cathodic protection for steel main. Install 500' of 2" PE main.	3800	\$69
52	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3761	054	010374	BS Main Replacement - 1824 Wall St, Fort Scott - Retire 190' of 3" APBS, 73' of 2" APCS, and 75' of 1.25" PE main due to leak on existing main segment. Install 100' of 4" PE main.	3760	\$3,906
53	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3642	054	010412	Bare Steel Main Replacement - 8th & Argyle, Minneapolis - Retire 900' 4" RPBS as part of the planned work projects included in the 3rd release from 2023. Install 900' of 4" PE main.	3760	\$68,626
54	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3642	054	010412	Bare Steel Main Replacement - 8th & Argyle, Minneapolis - Retire 900' 4" RPBS as part of the planned work projects included in the 3rd release from 2023. Install 900' of 4" PE main.	3769	\$2,116
55	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3642	054	010412	Bare Steel Main Replacement - 8th & Argyle, Minneapolis - Retire 900' 4" RPBS as part of the planned work projects included in the 3rd release from 2023. Install 900' of 4" PE main.	3800	\$825
56	Bare Steel Main Replacement	K.S.A. 66-2202	9/26/2024	3642	054	010415	BS Main Replacement - 10th & Rock, Minneapolis - Retire 55' of 4" CS, 15' of 4" BS, 3' of 2" CS main due to leak on existing main segment. Install 9' of 2" PE and 59' of 4" PE main.	3760	\$8,980
57	Bare Steel Main Replacement	K.S.A. 66-2202	8/28/2024	3641	054	010433	BS Main Replacement - 4th & Republic, Salina - Retire 580' of 2" BS main as part of the annual planned work projects. Install 580' of 2" PE main.	3760	\$35,100
58	Bare Steel Main Replacement	K.S.A. 66-2202	8/28/2024	3641	054	010433	BS Main Replacement - 4th & Republic, Salina - Retire 580' of 2" BS main as part of the annual planned work projects. Install 580' of 2" PE main.	3800	\$49
59	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3641	054	010445	Main Replacement - 205 N Walnut, Abilene - Retire 62' of 2" APBS, 140' of 4" APBS, and 70' of 1 1/4" APCS to permanently repair and replace a clamped leak on existing main segment. Install 200' 2" PE main.	3760	\$13,738
60	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3641	054	010445	Main Replacement - 205 N Walnut, Abilene - Retire 62' of 2" APBS, 140' of 4" APBS, and 70' of 1 1/4" APCS to permanently repair and replace a clamped leak on existing main segment. Install 200' 2" PE main.	3765	\$55
61	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3641	054	010445	Main Replacement - 205 N Walnut, Abilene - Retire 62' of 2" APBS, 140' of 4" APBS, and 70' of 1 1/4" APCS to permanently repair and replace a clamped leak on existing main segment. Install 200' 2" PE main.	3769	\$1,803
62	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3641	054	010445	Main Replacement - 205 N Walnut, Abilene - Retire 62' of 2" APBS, 140' of 4" APBS, and 70' of 1 1/4" APCS to permanently repair and replace a clamped leak on existing main segment. Install 200' 2" PE main.	3800	\$3,280
63	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3641	054	010446	BS Main Replacement - 109 NE 10th, Abilene - Retire 18' of 3" BS main due to leak on existing main segment. Install 55' of 2" PE main.	3760	\$9,370
64	Bare Steel Main Replacement	K.S.A. 66-2202	9/19/2024	3631	054	010471	BS Main Replacement - 210 N Garfield, Stafford - Retire 100' of 2" BS main to permanently repair and replace a leaking Dresser coupling. Install 100' of 2" PE main.	3760	\$12,196
65	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3631	054	010478	BS Main Replacement - Washington & 15th & 14th, Hutchinson - Retire 100' of 2" APCS and 65' of 3" BS main due to inadequate cathodic protection. Install 65' of 4" PE main.	3760	\$18,367
66	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3631	054	010478	BS Main Replacement - Washington & 15th & 14th, Hutchinson - Retire 100' of 2" APCS and 65' of 3" BS main due to inadequate cathodic protection. Install 65' of 4" PE main.	3769	\$1,997
67	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3631	054	010478	BS Main Replacement - Washington & 15th & 14th, Hutchinson - Retire 100' of 2" APCS and 65' of 3" BS main due to inadequate cathodic protection. Install 65' of 4" PE main.	3800	\$1,074
68	Bare Steel Main Replacement	K.S.A. 66-2202	12/16/2024	3741	054	010526	BS Main Replacement - 405 S 3rd St, Ark City - Retire 140' of 2" RPBS and 34' of 2" RPCS main to prevent multiple service lines from crossing multiple private properties. Install 350' of 2" PE main.	3760	\$2,849
69	Bare Steel Main Replacement	K.S.A. 66-2202	12/16/2024	3741	054	010526	BS Main Replacement - 405 S 3rd St, Ark City - Retire 140' of 2" RPBS and 34' of 2" RPCS main to prevent multiple service lines from crossing multiple private properties. Install 350' of 2" PE main.	3800	\$589
70	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3741	054	010529	BS Main Replacement - 31531 53rd Rd, Arkansas City - Retire 60' of 2" RPBS main due to leaking coupling on existing main segment. Install 60' of 2" RPCS main to permanently repair and replace a tightened coupling.	3765	\$7,120
71	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3741	054	010529	BS Main Replacement - 31531 53rd Rd, Arkansas City - Retire 60' of 2" RPBS main due to leaking coupling on existing main segment. Install 60' of 2" RPCS main to permanently repair and replace a tightened coupling.	3800	\$215
72	Bare Steel Main Replacement	K.S.A. 66-2202	12/16/2024	3741	054	010530	BS Main Replacement - 32956 Byrd St, Ark City - Retire 40' of 2" RPBS main to permanently repair and replace a tightened Dresser coupling due to leak on existing main segment. Install 40' of 2" RPCS main.	3765	\$4,220
73	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010785	Install 1600' 2" PE, 320' 4" PE. Retire 278' 2" BS, 1450' 2" BS, 416' 4" CS, 230' 4" PE. 200 Rice Rd, Silver Lake KS. This is a planned work project to replace bare steel main near the school in Silver Lake	3760	\$127,931

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
74	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010785	Install 1600' 2" PE, 320' 4" PE. Retire 278' 2" BS, 1450' 2" BS, 416' 4" CS, 230' 4" PE. 200 Rice Rd, Silver Lake KS. This is a planned work project to replace bare steel main near the school in Silver Lake	3800	\$16,450
75	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010789	Install 1830' 16" CS, 450' 4" PE. Retire 1773' 16" APBS, 48' 16" APCS. SE 21st and Indiana, Topeka KS. This is a planned work project to replace bare steel main that a leak was found and clamped on in April 2024.	3760	\$172,818
76	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010789	Install 1830' 16" CS, 450' 4" PE. Retire 1773' 16" APBS, 48' 16" APCS. SE 21st and Indiana, Topeka KS. This is a planned work project to replace bare steel main that a leak was found and clamped on in April 2024.	3765	\$1,485,445
77	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010789	Install 1830' 16" CS, 450' 4" PE. Retire 1773' 16" APBS, 48' 16" APCS. SE 21st and Indiana, Topeka KS. This is a planned work project to replace bare steel main that a leak was found and clamped on in April 2024.	3769	\$7,040
78	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010789	Install 1830' 16" CS, 450' 4" PE. Retire 1773' 16" APBS, 48' 16" APCS. SE 21st and Indiana, Topeka KS. This is a planned work project to replace bare steel main that a leak was found and clamped on in April 2024.	3800	\$3,668
79	Bare Steel Main Replacement	K.S.A. 66-2202	9/19/2024	3541	054	010791	Install 550' 4" PE, 100' 2" PE. Retire 500' 6" UPBS, 50' 6" UPCS. NW Fairchild and Van Buren St, Topeka KS. This work is to replace a section of unprotected bare steel with PE main. This project also increases the MOP of the system to the surrounding 45psig.	3760	\$142,660
80	Bare Steel Main Replacement	K.S.A. 66-2202	9/19/2024	3541	054	010791	Install 550' 4" PE, 100' 2" PE. Retire 500' 6" UPBS, 50' 6" UPCS. NW Fairchild and Van Buren St, Topeka KS. This work is to replace a section of unprotected bare steel with PE main. This project also increases the MOP of the system to the surrounding 45psig.	3800	\$66,406
81	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010795	Install 2925' 2" PE. Retire 2383' 2" BS, 55' 2" CS. SW 25th and Duncan, Topeka KS. This is a planned work project to replace bare steel and move main out of crowded rear easements.	3760	\$222,031
82	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3541	054	010795	Install 2925' 2" PE. Retire 2383' 2" BS, 55' 2" CS. SW 25th and Duncan, Topeka KS. This is a planned work project to replace bare steel and move main out of crowded rear easements.	3800	\$312,701
83	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3541	054	010801	Install 1400' 2" PE. Retire 422' 4" BS, 125' 1.25" PE, 1681' 6" BS. NW Polk and Morse, Topeka KS. This project is to replace bare steel main and services. The project also addresses a class 2 leak that could not be permanently repaired due to corrosion.	3760	\$94,109
84	Bare Steel Main Replacement	K.S.A. 66-2202	2/3/2025	3541	054	010801	Install 1400' 2" PE. Retire 422' 4" BS, 125' 1.25" PE, 1681' 6" BS. NW Polk and Morse, Topeka KS. This project is to replace bare steel main and services. The project also addresses a class 2 leak that could not be permanently repaired due to corrosion.	3800	\$38,424
85	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011538	Retire 1115' 4" BS main and 25' 2" PE main. Fairway Rd, South of Shawnee Mission Pkwy Fairway, KS. Install 1145 2" PE main. This work order is for the replacement of bare steel main with PE main. This project has been approved for the 2020 annual work plan and contributes towards the total bare steel main replacement.	3760	\$90,472
86	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011538	Retire 1115' 4" BS main and 25' 2" PE main. Fairway Rd, South of Shawnee Mission Pkwy Fairway, KS. Install 1145 2" PE main. This work order is for the replacement of bare steel main with PE main. This project has been approved for the 2020 annual work plan and contributes towards the total bare steel main replacement.	3769	\$2,287
87	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011538	Retire 1115' 4" BS main and 25' 2" PE main. Fairway Rd, South of Shawnee Mission Pkwy Fairway, KS. Install 1145 2" PE main. This work order is for the replacement of bare steel main with PE main. This project has been approved for the 2020 annual work plan and contributes towards the total bare steel main replacement.	3800	\$161,613
88	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011614	Retire 6' 2" BS, 1142' 4" BS, 14' 4 inch CS, 6' 2" PE and 55' 4" PE main. Tomahawk Rd and Prairie Ln, Prairie Village, KS. Install 1250' 4" PE and 50' 2" PE Main. This work is part of the C55 AWP Plan for 2022. This work was identified by the C55 Risk Model.	3760	\$251,908
89	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011614	Retire 6' 2" BS, 1142' 4" BS, 14' 4 inch CS, 6' 2" PE and 55' 4" PE main. Tomahawk Rd and Prairie Ln, Prairie Village, KS. Install 1250' 4" PE and 50' 2" PE Main. This work is part of the C55 AWP Plan for 2022. This work was identified by the C55 Risk Model.	3769	\$2,488
90	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011614	Retire 6' 2" BS, 1142' 4" BS, 14' 4 inch CS, 6' 2" PE and 55' 4" PE main. Tomahawk Rd and Prairie Ln, Prairie Village, KS. Install 1250' 4" PE and 50' 2" PE Main. This work is part of the C55 AWP Plan for 2022. This work was identified by the C55 Risk Model.	3800	\$34,452
91	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3522	054	011707	Retire 1800' 16" BS and 2250' 20" CS Main. 7th St and Sunshine St, Kansas City, KS. Install 1880' 16" CS, 20' 20" CS, 1260' 6" PE and 300' 2" CS Main. This work is an annual bare steel replacement program project.	3760	\$413,616
92	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3522	054	011707	Retire 1800' 16" BS and 2250' 20" CS Main. 7th St and Sunshine St, Kansas City, KS. Install 1880' 16" CS, 20' 20" CS, 1260' 6" PE and 300' 2" CS Main. This work is an annual bare steel replacement program project.	3765	\$2,454,173
93	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3522	054	011707	Retire 1800' 16" BS and 2250' 20" CS Main. 7th St and Sunshine St, Kansas City, KS. Install 1880' 16" CS, 20' 20" CS, 1260' 6" PE and 300' 2" CS Main. This work is an annual bare steel replacement program project.	3800	\$102,028
94	Bare Steel Main Replacement	K.S.A. 66-2202	2/26/2025	3522	054	011710	Install 8755' 2" PE. Retire 1248' 2" BS, 145' 3" BS, 6256' 4" BS, 10' 2" CS, 237' 4" CS. 292' 2" PE and 56' 4" PE. 65th and Roe, Prairie Village, KS. This is a planned work project to replace bare steel main in a neighborhood. Main was moved out of rear easements to roads.	3760	\$591,961
95	Bare Steel Main Replacement	K.S.A. 66-2202	2/26/2025	3522	054	011710	Install 8755' 2" PE. Retire 1248' 2" BS, 145' 3" BS, 6256' 4" BS, 10' 2" CS, 237' 4" CS. 292' 2" PE and 56' 4" PE. 65th and Roe, Prairie Village, KS. This is a planned work project to replace bare steel main in a neighborhood. Main was moved out of rear easements to roads.	3800	\$672,359
96	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011724	Retire 250' 4" BS and 70' 2" BS Main. 44th and Everett, Kansas City. Install 250' 4" PE, 120' 2" PE Main. Replace the unprotected bare steel main as part of the annual work plan projects.	3760	\$69,591
97	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011724	Retire 250' 4" BS and 70' 2" BS Main. 44th and Everett, Kansas City. Install 250' 4" PE, 120' 2" PE Main. Replace the unprotected bare steel main as part of the annual work plan projects.	3769	\$5,495
98	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011724	Retire 250' 4" BS and 70' 2" BS Main. 44th and Everett, Kansas City. Install 250' 4" PE, 120' 2" PE Main. Replace the unprotected bare steel main as part of the annual work plan projects.	3800	\$639
99	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3522	054	011795	Retire 65' 4" BS Main. 3409 Woodend Ave, Kansas City, KS. Install 70' 4" PE Main. This work is to permanently repair a class 1 leak.	3760	\$42,246
100	Bare Steel Main Replacement	K.S.A. 66-2202	9/26/2024	3522	054	011803	Retire 40' 2" BS main. 6523 W 77th Ter, Overland Park, KS. Install 40' 2" PE main. This work is being done to install a PE dog leg to eliminate the leak on the BS main.	3760	\$6,211
101	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011804	Retire 194' 2" BS and 416' 2" CS Main. 34th and Gibbs, Kansas City. Install 500' 2" PE Main and 250' 1.25" PE service line. This work is being done to eliminate a section of exposed main and is part of our bare steel replacement program.	3760	\$69,958
102	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011804	Retire 194' 2" BS and 416' 2" CS Main. 34th and Gibbs, Kansas City. Install 500' 2" PE Main and 250' 1.25" PE service line. This work is being done to eliminate a section of exposed main and is part of our bare steel replacement program.	3765	\$3,093
103	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011804	Retire 194' 2" BS and 416' 2" CS Main. 34th and Gibbs, Kansas City. Install 500' 2" PE Main and 250' 1.25" PE service line. This work is being done to eliminate a section of exposed main and is part of our bare steel replacement program.	3800	\$9,913
104	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011804	Retire 194' 2" BS and 416' 2" CS Main. 34th and Gibbs, Kansas City. Install 500' 2" PE Main and 250' 1.25" PE service line. This work is being done to eliminate a section of exposed main and is part of our bare steel replacement program.	3820	\$3,353
105	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3522	054	011804	Retire 194' 2" BS and 416' 2" CS Main. 34th and Gibbs, Kansas City. Install 500' 2" PE Main and 250' 1.25" PE service line. This work is being done to eliminate a section of exposed main and is part of our bare steel replacement program.	3830	\$22,083
106	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3522	054	011812	Retire 25' 3" BS Main. 5637 Dearborn St, Mission, KS. Install 25' 2" CS Main. This work is to permanently repair a class 1 and class 3 leak.	3765	\$7,022
107	Bare Steel Main Replacement	K.S.A. 66-2202	11/1/2024	3721	053	011894	BS Main Encroachment - 1145 S Terrace Dr, Wichita - Retire 100' of 2" APBS main located underneath a customer's shed. Install and relocate 100' of 2" PE main.	3760	\$10,705

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
108	Bare Steel Main Replacement	K.S.A. 66-2202	11/1/2024	3721	053	011894	BS Main Encroachment - 1145 S Terrace Dr, Wichita - Retire 100' of 2" APBS main located underneath a customer's shed. Install and relocate 100' of 2" PE main.	3800	\$2,942
109	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012635	RPBS Main Replacement - 2208 E 51st S, Wichita - Retire 15' of 4" RPBS main due to BS service line tap located under an established tree in customer's yard. Install 15' of 4" RPCS main.	3800	\$4,219
110	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012780	BS Main Replacement - 2nd & Muse, Newton - Retire 420' of 4" RPBS, 425' of 2" RPBS, 190' of 4" RPCS, and 90' of 2" RPCS as part of the 2023 annual work plan projects. Install 1,125' of 2" PE. 1 BS Service Line Renewal.	3760	\$83,419
111	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012780	BS Main Replacement - 2nd & Muse, Newton - Retire 420' of 4" RPBS, 425' of 2" RPBS, 190' of 4" RPCS, and 90' of 2" RPCS as part of the 2023 annual work plan projects. Install 1,125' of 2" PE. 1 BS Service Line Renewal.	3800	\$16,540
112	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012835	BS Main Replacement - Orme & Crestway, Wichita - Retire 2,260' of 2" UPBS, 350' of 6" CS, and 315' of 8" CS main as part of the 2023 annual work plan projects. Install 2,500' of 2" PE main.	3760	\$145,195
113	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012835	BS Main Replacement - Orme & Crestway, Wichita - Retire 2,260' of 2" UPBS, 350' of 6" CS, and 315' of 8" CS main as part of the 2023 annual work plan projects. Install 2,500' of 2" PE main.	3765	\$20,400
114	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012835	BS Main Replacement - Orme & Crestway, Wichita - Retire 2,260' of 2" UPBS, 350' of 6" CS, and 315' of 8" CS main as part of the 2023 annual work plan projects. Install 2,500' of 2" PE main.	3800	\$96,021
115	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012835	BS Main Replacement - Orme & Crestway, Wichita - Retire 2,260' of 2" UPBS, 350' of 6" CS, and 315' of 8" CS main as part of the 2023 annual work plan projects. Install 2,500' of 2" PE main.	3820	\$11,719
116	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012835	BS Main Replacement - Orme & Crestway, Wichita - Retire 2,260' of 2" UPBS, 350' of 6" CS, and 315' of 8" CS main as part of the 2023 annual work plan projects. Install 2,500' of 2" PE main.	3830	\$10,565
117	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012848	BS Main Replacement - Oak & 3rd, Newton - Retire 63' of 4" APCS, 134' of 2" APCS, 18' of 2" APCS, 355' of 3" RPBS, 66' of 3" RPCS, and 77' of 3" PE as part of the 2023 annual work plan projects with the goal of reducing the amount of BS main in the system. Install 700' of 2" PE.	3760	\$83,140
118	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012848	BS Main Replacement - Oak & 3rd, Newton - Retire 63' of 4" APCS, 134' of 2" APCS, 18' of 2" APCS, 355' of 3" RPBS, 66' of 3" RPCS, and 77' of 3" PE as part of the 2023 annual work plan projects with the goal of reducing the amount of BS main in the system. Install 700' of 2" PE.	3800	\$52,690
119	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012848	BS Main Replacement - Oak & 3rd, Newton - Retire 63' of 4" APCS, 134' of 2" APCS, 18' of 2" APCS, 355' of 3" RPBS, 66' of 3" RPCS, and 77' of 3" PE as part of the 2023 annual work plan projects with the goal of reducing the amount of BS main in the system. Install 700' of 2" PE.	3820	\$3,537
120	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012848	BS Main Replacement - Oak & 3rd, Newton - Retire 63' of 4" APCS, 134' of 2" APCS, 18' of 2" APCS, 355' of 3" RPBS, 66' of 3" RPCS, and 77' of 3" PE as part of the 2023 annual work plan projects with the goal of reducing the amount of BS main in the system. Install 700' of 2" PE.	3830	\$2,124
121	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012850	BS Main Replacement - E 4th St & N Oak, Newton - Retire 750' of 4" RPBS and 210' of 2" RPBS as part of the 2023 annual work plan projects. Install 750' of 4" CS and 210' of 2" PE.	3760	\$23,234
122	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012850	BS Main Replacement - E 4th St & N Oak, Newton - Retire 750' of 4" RPBS and 210' of 2" RPBS as part of the 2023 annual work plan projects. Install 750' of 4" CS and 210' of 2" PE.	3765	\$139,247
123	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012850	BS Main Replacement - E 4th St & N Oak, Newton - Retire 750' of 4" RPBS and 210' of 2" RPBS as part of the 2023 annual work plan projects. Install 750' of 4" CS and 210' of 2" PE.	3780	\$8,452
124	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012850	BS Main Replacement - E 4th St & N Oak, Newton - Retire 750' of 4" RPBS and 210' of 2" RPBS as part of the 2023 annual work plan projects. Install 750' of 4" CS and 210' of 2" PE.	3800	\$11,912
125	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012881	BS Main Replacement - Main & 7th, Belle Plaine - Retire 260' of RPBS, 200' of 3" RPBS, 50' of 3" RPCS main as part of the planned worked projects included in the first release from 2023. Install 260' of 2" PE and 250' of 2" CS main.	3760	\$29,109
126	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012881	BS Main Replacement - Main & 7th, Belle Plaine - Retire 260' of RPBS, 200' of 3" RPBS, 50' of 3" RPCS main as part of the planned worked projects included in the first release from 2023. Install 260' of 2" PE and 250' of 2" CS main.	3765	\$38,231
127	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012881	BS Main Replacement - Main & 7th, Belle Plaine - Retire 260' of RPBS, 200' of 3" RPBS, 50' of 3" RPCS main as part of the planned worked projects included in the first release from 2023. Install 260' of 2" PE and 250' of 2" CS main.	3800	\$1,781
128	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012884	BS Main Replacement - Merchant & 5th, Belle Plaine - Retire 485' of 2" RPBS, 1,580' of 3" RPBS, 525' of 2" RPCS, 505' of 3" RPCS, 290' of 4" RPCS. 245' of 2" PE, and 140' of 3" PE main as part of the planned work projects included in the first release from 2023. Install 3,800' of 2" PE main.	3760	\$201,701
129	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012884	BS Main Replacement - Merchant & 5th, Belle Plaine - Retire 485' of 2" RPBS, 1,580' of 3" RPBS, 525' of 2" RPCS, 505' of 3" RPCS, 290' of 4" RPCS. 245' of 2" PE, and 140' of 3" PE main as part of the planned work projects included in the first release from 2023. Install 3,800' of 2" PE main.	3800	\$21,267
130	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012884	BS Main Replacement - Merchant & 5th, Belle Plaine - Retire 485' of 2" RPBS, 1,580' of 3" RPBS, 525' of 2" RPCS, 505' of 3" RPCS, 290' of 4" RPCS. 245' of 2" PE, and 140' of 3" PE main as part of the planned work projects included in the first release from 2023. Install 3,800' of 2" PE main.	3820	\$3,309
131	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012884	BS Main Replacement - Merchant & 5th, Belle Plaine - Retire 485' of 2" RPBS, 1,580' of 3" RPBS, 525' of 2" RPCS, 505' of 3" RPCS, 290' of 4" RPCS. 245' of 2" PE, and 140' of 3" PE main as part of the planned work projects included in the first release from 2023. Install 3,800' of 2" PE main.	3830	\$3,377
132	Bare Steel Main Replacement	K.S.A. 66-2202	9/19/2024	3721	054	012891	BS Main Replacement - Country Club & Holyoke, Wichita - Retire 402' of 4" BS main as part of the annual planned work projects. Install 400' of 4" PE main. Install: 400' of 4" PE Retire: 402' of 4" BS	3760	\$27,520
133	Bare Steel Main Replacement	K.S.A. 66-2202	9/19/2024	3721	054	012891	BS Main Replacement - Country Club & Holyoke, Wichita - Retire 402' of 4" BS main as part of the annual planned work projects. Install 400' of 4" PE main. Install: 400' of 4" PE Retire: 402' of 4" BS	3800	\$26,204
134	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012901	BS Main Replacement - Osage & Burton, Wichita - Retire 279' of 4" UPBS and 42' of 4" APCS main as part of the annual planned worked projects released in 2023. Install 325' of 4" PE main.	3760	\$77,912
135	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012901	BS Main Replacement - Osage & Burton, Wichita - Retire 279' of 4" UPBS and 42' of 4" APCS main as part of the annual planned worked projects released in 2023. Install 325' of 4" PE main.	3800	\$9,603
136	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012948	BS Main Replacement - Roanoke & Mt. Vernon, Wichita - Retire 2,500' of 2" BS main as part of the first release of planned work projects in 2023. Install 2,500' of 2" PE main.	3760	\$138,090
137	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012948	BS Main Replacement - Roanoke & Mt. Vernon, Wichita - Retire 2,500' of 2" BS main as part of the first release of planned work projects in 2023. Install 2,500' of 2" PE main.	3765	\$1,634
138	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012948	BS Main Replacement - Roanoke & Mt. Vernon, Wichita - Retire 2,500' of 2" BS main as part of the first release of planned work projects in 2023. Install 2,500' of 2" PE main.	3800	\$103,418
139	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012949	BS Main Replacement - 6003 W Maple, Wichita - Retire 20' of 4" BS main due to leak on existing main segment. Install 20' of 4" PE main to permanently repair the clamped leak.	3760	\$5,869
140	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012949	BS Main Replacement - 6003 W Maple, Wichita - Retire 20' of 4" BS main due to leak on existing main segment. Install 20' of 4" PE main to permanently repair the clamped leak.	3769	\$1,920
141	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012949	BS Main Replacement - 6003 W Maple, Wichita - Retire 20' of 4" BS main due to leak on existing main segment. Install 20' of 4" PE main to permanently repair the clamped leak.	3800	\$65
142	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012967	BS Main Replacement - Ohio & Douglas, Wichita - Retire 170' of 4" APBS and 51' of 2" APBS main included in the second release of planned work projects for 2023. Install 30' of 8" CS and 140' of 4" PE main.	3760	\$73,216
143	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012967	BS Main Replacement - Ohio & Douglas, Wichita - Retire 170' of 4" APBS and 51' of 2" APBS main included in the second release of planned work projects for 2023. Install 30' of 8" CS and 140' of 4" PE main.	3765	\$37,399

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
144	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012967	BS Main Replacement - Ohio & Douglas, Wichita - Retire 170' of 4" APBS and 51' of 2" APBS main included in the second release of planned work projects for 2023. Install 30' of 8" CS and 140' of 4" PE main.	3769	\$2,960
145	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012967	BS Main Replacement - Ohio & Douglas, Wichita - Retire 170' of 4" APBS and 51' of 2" APBS main included in the second release of planned work projects for 2023. Install 30' of 8" CS and 140' of 4" PE main.	3800	\$15,408
146	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012971	BS Main Replacement - Hillside & Cessna, Wichita - Retire 1,800' of 2" UPBS, 1,500' of 1.5" UPBS, 650' of 4" UPBS, 95' of 4" PE, and 5' of 4" APCS main included in the third release of planned work projects for 2023. Install 1,350' of 2" PE and 500' of 4" PE main.	3760	\$116,754
147	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012971	BS Main Replacement - Hillside & Cessna, Wichita - Retire 1,800' of 2" UPBS, 1,500' of 1.5" UPBS, 650' of 4" UPBS, 95' of 4" PE, and 5' of 4" APCS main included in the third release of planned work projects for 2023. Install 1,350' of 2" PE and 500' of 4" PE main.	3769	\$856
148	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012971	BS Main Replacement - Hillside & Cessna, Wichita - Retire 1,800' of 2" UPBS, 1,500' of 1.5" UPBS, 650' of 4" UPBS, 95' of 4" PE, and 5' of 4" APCS main included in the third release of planned work projects for 2023. Install 1,350' of 2" PE and 500' of 4" PE main.	3800	\$126,086
149	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012971	BS Main Replacement - Hillside & Cessna, Wichita - Retire 1,800' of 2" UPBS, 1,500' of 1.5" UPBS, 650' of 4" UPBS, 95' of 4" PE, and 5' of 4" APCS main included in the third release of planned work projects for 2023. Install 1,350' of 2" PE and 500' of 4" PE main.	3820	\$1,986
150	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012971	BS Main Replacement - Hillside & Cessna, Wichita - Retire 1,800' of 2" UPBS, 1,500' of 1.5" UPBS, 650' of 4" UPBS, 95' of 4" PE, and 5' of 4" APCS main included in the third release of planned work projects for 2023. Install 1,350' of 2" PE and 500' of 4" PE main.	3830	\$385
151	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012972	BS Main Replacement - Madison & Rockford, Derby - Retire 1,200' of 8" APBS main included in the second release of the planned work projects for 2023. Install 1,200' of 8" CS main.	3760	\$1,100
152	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012972	BS Main Replacement - Madison & Rockford, Derby - Retire 1,200' of 8" APBS main included in the second release of the planned work projects for 2023. Install 1,200' of 8" CS main.	3765	\$378,623
153	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012972	BS Main Replacement - Madison & Rockford, Derby - Retire 1,200' of 8" APBS main included in the second release of the planned work projects for 2023. Install 1,200' of 8" CS main.	3800	\$3,836
154	Bare Steel Main Replacement	K.S.A. 66-2202	10/29/2024	3721	054	012972	BS Main Replacement - Madison & Rockford, Derby - Retire 1,200' of 8" APBS main included in the second release of the planned work projects for 2023. Install 1,200' of 8" CS main.	3805	\$1,337
155	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012973	BS Main Replacement - Orme & Rock, Wichita - Retire 1,366' of 2" UPBS and 49' of 2" APCS main included in the second release of planned work projects in 2023. Install 1,400' of 2" PE main.	3760	\$114,633
156	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012973	BS Main Replacement - Orme & Rock, Wichita - Retire 1,366' of 2" UPBS and 49' of 2" APCS main included in the second release of planned work projects in 2023. Install 1,400' of 2" PE main.	3800	\$67,620
157	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012975	BS Main Replacement - Manfield & Rose, Wichita - Retire 1,825' of 2" UPBS, 175' of 2" APCS, 400' of 4" UPBS, and 85' of 2" PE main as part of the planned work projects for 2024. Install 2,565' of 2" PE main.	3760	\$125,303
158	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012975	BS Main Replacement - Manfield & Rose, Wichita - Retire 1,825' of 2" UPBS, 175' of 2" APCS, 400' of 4" UPBS, and 85' of 2" PE main as part of the planned work projects for 2024. Install 2,565' of 2" PE main.	3800	\$49,908
159	Bare Steel Main Replacement	K.S.A. 66-2202	9/30/2024	3721	054	012976	BS Main Replacement - Santa Fe & Pawnee, Wichita - Retire 1,243' of 2" UPBS and 17' of 2" APCS as part of the annual planned work projects. Install 1,260' of 2" PE main.	3760	\$71,631
160	Bare Steel Main Replacement	K.S.A. 66-2202	9/30/2024	3721	054	012976	BS Main Replacement - Santa Fe & Pawnee, Wichita - Retire 1,243' of 2" UPBS and 17' of 2" APCS as part of the annual planned work projects. Install 1,260' of 2" PE main.	3800	\$22,238
161	Bare Steel Main Replacement	K.S.A. 66-2202	9/30/2024	3721	054	012976	BS Main Replacement - Santa Fe & Pawnee, Wichita - Retire 1,243' of 2" UPBS and 17' of 2" APCS as part of the annual planned work projects. Install 1,260' of 2" PE main.	3820	\$3,918
162	Bare Steel Main Replacement	K.S.A. 66-2202	9/30/2024	3721	054	012976	BS Main Replacement - Santa Fe & Pawnee, Wichita - Retire 1,243' of 2" UPBS and 17' of 2" APCS as part of the annual planned work projects. Install 1,260' of 2" PE main.	3830	\$5,274
163	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012984	BS Main Replacement - Central & Prather, Mulvane - Retire 582' of 4" RPBS main included in the first release of planned work project in 2023. Install 650' of 4" CS.	3765	\$75,181
164	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012985	BS Main Replacement - Plaza and Westview, Mulvane - Retire 1,044' of 4" RPBS main as part of the first release of planned work projects for 2023. Install 350' of 6" CS, 730' of 4" PE, and 20' of 2" PE main.	3760	\$115,532
165	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012985	BS Main Replacement - Plaza and Westview, Mulvane - Retire 1,044' of 4" RPBS main as part of the first release of planned work projects for 2023. Install 350' of 6" CS, 730' of 4" PE, and 20' of 2" PE main.	3765	\$107,473
166	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012985	BS Main Replacement - Plaza and Westview, Mulvane - Retire 1,044' of 4" RPBS main as part of the first release of planned work projects for 2023. Install 350' of 6" CS, 730' of 4" PE, and 20' of 2" PE main.	3800	\$18,124
167	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012986	BS Main Replacement - 1st & Main, Mulvane - Retire 315' of 2" UPBS, 185' of 3" UPBS, 140' of 4" UPBS, 40' of 2" APCS, 185' of 3" APCS main included in the second release of planned work projects for 2023. Install 365' of 2" PE and 455' of 4" PE main.	3760	\$99,339
168	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012986	BS Main Replacement - 1st & Main, Mulvane - Retire 315' of 2" UPBS, 185' of 3" UPBS, 140' of 4" UPBS, 40' of 2" APCS, 185' of 3" APCS main included in the second release of planned work projects for 2023. Install 365' of 2" PE and 455' of 4" PE main.	3769	\$2,670
169	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	012986	BS Main Replacement - 1st & Main, Mulvane - Retire 315' of 2" UPBS, 185' of 3" UPBS, 140' of 4" UPBS, 40' of 2" APCS, 185' of 3" APCS main included in the second release of planned work projects for 2023. Install 365' of 2" PE and 455' of 4" PE main.	3800	\$11,652
170	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012989	BS Main Replacement - 21st & Topeka, Wichita - Retire 1,348' of 12" UPBS, 89' of 12" RPBS & 135' of 10" RPCS as part of the planned work projects included in the 2nd release from 2023. Install 1,700' of 12" RPCS main.	3765	\$750,649
171	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012989	BS Main Replacement - 21st & Topeka, Wichita - Retire 1,348' of 12" UPBS, 89' of 12" RPBS & 135' of 10" RPCS as part of the planned work projects included in the 2nd release from 2023. Install 1,700' of 12" RPCS main.	3800	\$1,318
172	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012990	BS Main Replacement - Lee & Gorin, Clearwater - Retire 125' of 2" PE, 25' of 2" CS, 900' of 2" UPBS, 400' of 3" UPBS and existing DRS included in the first release of planned work projects in 2023. Install 1,150' of 2" PE and 365' of 2" CS main.	3760	\$86,527
173	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012990	BS Main Replacement - Lee & Gorin, Clearwater - Retire 125' of 2" PE, 25' of 2" CS, 900' of 2" UPBS, 400' of 3" UPBS and existing DRS included in the first release of planned work projects in 2023. Install 1,150' of 2" PE and 365' of 2" CS main.	3765	\$48,155
174	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012990	BS Main Replacement - Lee & Gorin, Clearwater - Retire 125' of 2" PE, 25' of 2" CS, 900' of 2" UPBS, 400' of 3" UPBS and existing DRS included in the first release of planned work projects in 2023. Install 1,150' of 2" PE and 365' of 2" CS main.	3800	\$16,276
175	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012990	BS Main Replacement - Lee & Gorin, Clearwater - Retire 125' of 2" PE, 25' of 2" CS, 900' of 2" UPBS, 400' of 3" UPBS and existing DRS included in the first release of planned work projects in 2023. Install 1,150' of 2" PE and 365' of 2" CS main.	3820	\$3,152
176	Bare Steel Main Replacement	K.S.A. 66-2202	1/28/2025	3721	054	012990	BS Main Replacement - Lee & Gorin, Clearwater - Retire 125' of 2" PE, 25' of 2" CS, 900' of 2" UPBS, 400' of 3" UPBS and existing DRS included in the first release of planned work projects in 2023. Install 1,150' of 2" PE and 365' of 2" CS main.	3830	\$2,439
177	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012991	Bare steel main replacement - Oliver, Lincoln to Harry - Wichita - retire 2514' 8" APBS, 88' 8" RPCS, 79' 6" APCS, 44' 8" APCS, 19' 6" APBS & 221' 2" APCS as part of the planned work projects included in the 2nd release from 2023. Install 2,700' of 8" APCS & 150' 6" PE.	3760	\$24,552
178	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012991	Bare steel main replacement - Oliver, Lincoln to Harry - Wichita - retire 2514' 8" APBS, 88' 8" RPCS, 79' 6" APCS, 44' 8" APCS, 19' 6" APBS & 221' 2" APCS as part of the planned work projects included in the 2nd release from 2023. Install 2,700' of 8" APCS & 150' 6" PE.	3765	\$527,400

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
179	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	012991	Bare steel main replacement - Oliver, Lincoln to Harry - Wichita - retire 2514' 8" APBS, 88' 8" RPCS, 79' 6" APCS, 44' 8" APCS, 19' 6" APBS & 221' 2" APCS as part of the planned work projects included in the 2nd release from 2023. Install 2,700' of 8" APCS & 150' 6" PE.	3800	\$5,165
180	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012996	Bare steel main replacement - 10th & Saint Paul, Wichita - retire 3,469' of 2" UPBS, 353' of 2" CS, and 356' of 2" PE as part of the planned work projects included in the 3rd release from 2023. Install 4180' of 2" PE main.	3760	\$182,375
181	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012996	Bare steel main replacement - 10th & Saint Paul, Wichita - retire 3,469' of 2" UPBS, 353' of 2" CS, and 356' of 2" PE as part of the planned work projects included in the 3rd release from 2023. Install 4180' of 2" PE main.	3769	\$678
182	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012996	Bare steel main replacement - 10th & Saint Paul, Wichita - retire 3,469' of 2" UPBS, 353' of 2" CS, and 356' of 2" PE as part of the planned work projects included in the 3rd release from 2023. Install 4180' of 2" PE main.	3800	\$71,297
183	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012997	BS Main Replacement - St. Louis and St. Clair - Retire 205' of 2" PE, 3,190' of 2" UPBS and 500' of 4" UPBS main included in the third release of planned work projects for 2023. Install 4,025' of 2" PE main.	3760	\$258,767
184	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012997	BS Main Replacement - St. Louis and St. Clair - Retire 205' of 2" PE, 3,190' of 2" UPBS and 500' of 4" UPBS main included in the third release of planned work projects for 2023. Install 4,025' of 2" PE main.	3769	\$1,500
185	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	012997	BS Main Replacement - St. Louis and St. Clair - Retire 205' of 2" PE, 3,190' of 2" UPBS and 500' of 4" UPBS main included in the third release of planned work projects for 2023. Install 4,025' of 2" PE main.	3800	\$58,048
186	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012998	BS Main Replacement - 3056 N Coolidge Ave, Wichita - Retire 115' of 2" RPBS main due to leak on existing main segment. Install 115' of 2" RPCS main to permanently repair and replace clamped leak.	3765	\$19,696
187	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012999	BS Main Replacement - Washington & Olive, El Dorado - Retire 317' of 3" UPBS and 416' of 2" UPBS main included in the second release of planned work projects in 2023. Install 875' of 2" PE main. Install: 875' of 2" PE.	3760	\$50,206
188	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012999	BS Main Replacement - Washington & Olive, El Dorado - Retire 317' of 3" UPBS and 416' of 2" UPBS main included in the second release of planned work projects in 2023. Install 875' of 2" PE main. Install: 875' of 2" PE.	3765	\$17,756
189	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012999	BS Main Replacement - Washington & Olive, El Dorado - Retire 317' of 3" UPBS and 416' of 2" UPBS main included in the second release of planned work projects in 2023. Install 875' of 2" PE main. Install: 875' of 2" PE.	3800	\$23,389
190	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012999	BS Main Replacement - Washington & Olive, El Dorado - Retire 317' of 3" UPBS and 416' of 2" UPBS main included in the second release of planned work projects in 2023. Install 875' of 2" PE main. Install: 875' of 2" PE.	3820	\$3,003
191	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	012999	BS Main Replacement - Washington & Olive, El Dorado - Retire 317' of 3" UPBS and 416' of 2" UPBS main included in the second release of planned work projects in 2023. Install 875' of 2" PE main. Install: 875' of 2" PE.	3830	\$2,419
192	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	013003	Bare steel main replacement near 2nd & Stearns in Haysville - Retire 4,915' of 4" UPBS as part of the planned work projects included in the third release of planned work projects for 2023. Install 4,660' of 2" PE main.	3760	\$282,719
193	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	013003	Bare steel main replacement near 2nd & Stearns in Haysville - Retire 4,915' of 4" UPBS as part of the planned work projects included in the third release of planned work projects for 2023. Install 4,660' of 2" PE main.	3769	\$1,051
194	Bare Steel Main Replacement	K.S.A. 66-2202	12/31/2024	3721	054	013003	Bare steel main replacement near 2nd & Stearns in Haysville - Retire 4,915' of 4" UPBS as part of the planned work projects included in the third release of planned work projects for 2023. Install 4,660' of 2" PE main.	3800	\$69,413
195	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	013008	Scope of Work: Bare steel main replacement - Hydraulic and Scott, Wichita Retire 1892' of UPBS as part of the planned work projects included in the 3rd release from 2023. Install 2500' of 2" PE main.	3760	\$117,216
196	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	013008	Scope of Work: Bare steel main replacement - Hydraulic and Scott, Wichita Retire 1892' of UPBS as part of the planned work projects included in the 3rd release from 2023. Install 2500' of 2" PE main.	3800	\$92,042
197	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013017	BS Main Replacement - 11th & Harding, Wichita - Retire 650' of 2" APBS and 600' of 2" APCS main in order remove load on the low-pressure system causing SCADA to alarm during winter cold snaps. Install 625' of 2" PE and 750' of 4" PE.	3760	\$64,600
198	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013017	BS Main Replacement - 11th & Harding, Wichita - Retire 650' of 2" APBS and 600' of 2" APCS main in order remove load on the low-pressure system causing SCADA to alarm during winter cold snaps. Install 625' of 2" PE and 750' of 4" PE.	3800	\$24,221
199	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013017	BS Main Replacement - 11th & Harding, Wichita - Retire 650' of 2" APBS and 600' of 2" APCS main in order remove load on the low-pressure system causing SCADA to alarm during winter cold snaps. Install 625' of 2" PE and 750' of 4" PE.	3820	\$2,023
200	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013017	BS Main Replacement - 11th & Harding, Wichita - Retire 650' of 2" APBS and 600' of 2" APCS main in order remove load on the low-pressure system causing SCADA to alarm during winter cold snaps. Install 625' of 2" PE and 750' of 4" PE.	3830	\$1,882
201	Bare Steel Main Replacement	K.S.A. 66-2202	9/16/2024	3721	054	013031	BS Main Replacement - 322 E Harvey Ave, Wellington - Retire 208' RPBS due to leak on existing main segment. No main installation necessary.	3800	\$3,498
202	Bare Steel Main Replacement	K.S.A. 66-2202	8/15/2024	3721	054	013043	BS Main Replacement - 606 E 3rd ST, Douglass - Retire 10' of 2" RPBS due to leak on existing main segment. Install 10' of 2" CS main.	3765	\$3,927
203	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	013048	Main Replacement - 641 S. Armour, Wichita - Retire 55' of 2" UPBS & 110' of 2" APCS main due to leaking Dresser fitting. Install 165' of 2" APCS main to permanently repair and replace clamped leak.	3765	\$21,866
204	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	013048	Main Replacement - 641 S. Armour, Wichita - Retire 55' of 2" UPBS & 110' of 2" APCS main due to leaking Dresser fitting. Install 165' of 2" APCS main to permanently repair and replace clamped leak.	3769	\$2,688
205	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013051	BS Main Replacement - 909 N Topeka, Wichita - Retire 800' of 4" UPBS, 340' of 4" APCS, and 50' of 6" APCS in order to permanently repair and replace a clamped leak. Install 160' of 4" PE and 900' of 2" PE main.	3760	\$294,144
206	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013051	BS Main Replacement - 909 N Topeka, Wichita - Retire 800' of 4" UPBS, 340' of 4" APCS, and 50' of 6" APCS in order to permanently repair and replace a clamped leak. Install 160' of 4" PE and 900' of 2" PE main.	3769	\$2,246
207	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013051	BS Main Replacement - 909 N Topeka, Wichita - Retire 800' of 4" UPBS, 340' of 4" APCS, and 50' of 6" APCS in order to permanently repair and replace a clamped leak. Install 160' of 4" PE and 900' of 2" PE main.	3800	\$38,632
208	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013051	BS Main Replacement - 909 N Topeka, Wichita - Retire 800' of 4" UPBS, 340' of 4" APCS, and 50' of 6" APCS in order to permanently repair and replace a clamped leak. Install 160' of 4" PE and 900' of 2" PE main.	3820	\$6,407
209	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013051	BS Main Replacement - 909 N Topeka, Wichita - Retire 800' of 4" UPBS, 340' of 4" APCS, and 50' of 6" APCS in order to permanently repair and replace a clamped leak. Install 160' of 4" PE and 900' of 2" PE main.	3830	\$2,185
210	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	013058	BS Main Replacement - 537 Circle, Wichita - Retire 325' of 4" APBS main in order to clear a corrosion deficiency. Install 325' of 2" PE main.	3760	\$2,292
211	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	013058	BS Main Replacement - 537 Circle, Wichita - Retire 325' of 4" APBS main in order to clear a corrosion deficiency. Install 325' of 2" PE main.	3800	\$1,169
212	Bare Steel Main Replacement	K.S.A. 66-2202	2/28/2025	3721	054	013067	BS Main Replacement - 2236 E 53rd, Wichita - Retire 30' of 4" RPBS and 15' of 2" RPCS main due to permanently repair and replace a leaking Dresser coupling on existing main segment. Install 21' of 2" CS and 53' of 4" CS main.	3765	\$27,658
213	Bare Steel Main Replacement	K.S.A. 66-2202	9/16/2024	3721	054	013072	BS Main Replacement - 520 Randle, Wichita - Retire 500' of 2" BS main to abandon the BS yard lines serving multiple duplexes being feed from a single meter. Install 500' of 2" PE main.	3760	\$46,967
214	Bare Steel Main Replacement	K.S.A. 66-2202	9/16/2024	3721	054	013072	BS Main Replacement - 520 Randle, Wichita - Retire 500' of 2" BS main to abandon the BS yard lines serving multiple duplexes being feed from a single meter. Install 500' of 2" PE main.	3769	\$2,417
215	Bare Steel Main Replacement	K.S.A. 66-2202	9/16/2024	3721	054	013072	BS Main Replacement - 520 Randle, Wichita - Retire 500' of 2" BS main to abandon the BS yard lines serving multiple duplexes being feed from a single meter. Install 500' of 2" PE main.	3800	\$9,224
216	Bare Steel Main Replacement	K.S.A. 66-2202	10/15/2024	3721	054	013085	BS Main Replacement - 110 E Walnut, Wellington - Retire 120' of 1.25" BS due to leak on existing main segment. Install 117' of 2" PE main.	3760	\$10,861
217	Bare Steel Main Replacement	K.S.A. 66-2202	2/25/2025	3721	054	013089	Main Replacement - 4th & Magnolia, Newton - Retire 70' of 3" RPBS main due to leaking Dresser coupling on existing main segment. Install 78' of 4" CS main.	3765	\$15,098

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
218	Bare Steel Main Replacement	K.S.A. 66-2202	12/2/2024	3721	054	013097	BS Main Replacement - 31st St S & Hiram Ave, Wichita - Retire 76' of RPBS to permanently repair and replace a leak on existing main segment. Install 80' of 2" PE main.	3760	\$3,480
219	Bare Steel Main Replacement	K.S.A. 66-2202	1/15/2025	3721	054	013098	BS Main Replacement - 202 W Harvey, Wellington - Retire 35' of 2" RPBS main in order to replace the existing service line on the triggered sector report. Install 35' of 1.25" PE service line.	3800	\$3,991
	Bare Steel Main Replacement Total								\$15,663,143
220	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	2/25/2025	3621	054	010367	BS Service Line Replacement - 1801 Williams, Great Bend - Retire 16' OF 2" BS service line due to leak on service line and as part of the BS service line replacement program. Install 16' of 2" PE service line. Total services affected 1 are BS renewals	3800	\$3,979
221	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	2/25/2025	3761	054	010376	Main Replacement - 6336 SE 60th, Riverton - Retire 10' of 2" APCS main to abandon a BS service line with antiquated service tap tee. Install 10' of 2" CS main.	3765	\$4,607
222	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	8/28/2024	3631	054	010474	Scope of Work: 2" PE SL Insertion - 100 N Halstead, Hutchinson Insert 420' of 2" PE service line into abandoned 6" BS, 2" PE ball valve used as manual service valve.	3800	\$42,212
223	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	9/19/2024	3631	054	010476	BS Service Line Replacement - 14th & Madison, Hutchinson - Install 335' of 2" PE main to prevent two BS service line replacements from crossing private property.	3760	\$21,797
224	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	9/19/2024	3631	054	010476	BS Service Line Replacement - 14th & Madison, Hutchinson - Install 335' of 2" PE main to prevent two BS service line replacements from crossing private property.	3769	\$1,297
225	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	9/19/2024	3631	054	010476	BS Service Line Replacement - 14th & Madison, Hutchinson - Install 335' of 2" PE main to prevent two BS service line replacements from crossing private property.	3800	\$6,767
226	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	2/3/2025	3541	054	010797	Install 1600' 2" PE main. Retire 55 BS services, SE 23rd and Bellview, Topeka KS. This project is to replace bare steel service lines in an apartment complex. This job eliminates branch service lines by installing PE main behind the apartments	3760	\$117,231
227	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	2/3/2025	3541	054	010797	Install 1600' 2" PE main. Retire 55 BS services, SE 23rd and Bellview, Topeka KS. This project is to replace bare steel service lines in an apartment complex. This job eliminates branch service lines by installing PE main behind the apartments	3769	\$1,273
228	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	2/3/2025	3541	054	010797	Install 1600' 2" PE main. Retire 55 BS services, SE 23rd and Bellview, Topeka KS. This project is to replace bare steel service lines in an apartment complex. This job eliminates branch service lines by installing PE main behind the apartments	3800	\$110,966
229	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	3/3/2025	3522	054	011806	Retire 200' 3" CS Main. 1418 N 38th St, Kansas City. Install 200' 2" PE Main. The BS service lines are directly tied into the main so the main will be replaced so the service lines can be replaced.	3760	\$25,821
230	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	3/3/2025	3522	054	011806	Retire 200' 3" CS Main. 1418 N 38th St, Kansas City. Install 200' 2" PE Main. The BS service lines are directly tied into the main so the main will be replaced so the service lines can be replaced.	3800	\$3,455
231	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	1/15/2025	3721	054	012782	BS Service Line Renewal - 4219 W Irving St, Wichita - Retire 10' of 2" BS service line due to leak on existing service. Install 10' of 1.25" PE SL.	3805	\$3,808
232	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	1/15/2025	3721	054	012974	BS Service Line Renewal - 2045 N Broadway, Wichita - Retire 13' of 2" BS service line as part of the BS service line replacement program. Install 13' of 1.25" PE SL.	3769	\$1,954
233	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	1/15/2025	3721	054	012974	BS Service Line Renewal - 2045 N Broadway, Wichita - Retire 13' of 2" BS service line as part of the BS service line replacement program. Install 13' of 1.25" PE SL.	3800	\$3,339
234	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	12/2/2024	3721	054	013015	Main Retirement - 4615 E Orme St, Wichita - Retire 35' of 2" RPBS and 80' of 1.25" BS service line due to temporary repair on leaking Dresser end cap. Install 100' of 1.25" PE service line.	3800	\$7,873
235	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	8/15/2024	3721	054	013049	Service Line Replacement - 1882 Midfield Rd, Wichita - Retire 163' of 1.25" BS yard line due to leak on service line. Install 201' of 0.75" PE service line.	3800	\$1,513
236	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	8/15/2024	3721	054	013049	Service Line Replacement - 1882 Midfield Rd, Wichita - Retire 163' of 1.25" BS yard line due to leak on service line. Install 201' of 0.75" PE service line.	3820	\$206
237	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	2/25/2025	3721	054	013057	BS Service Line Replacements - 1219 N Broadway, Wichita - Retire 65' of 2" BS main serving multiple customers on one property and as part of the bare steel service line replacement program. Install 115' of 2" PE main.	3760	\$10,375
238	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	12/2/2024	3721	054	013063	Main Replacement & BS SL Renewal - Gow & Murdock, Wichita - Retire 60' of 2" APCS main due to a BS service line tap located under a large tree. Install 60' of 2" PE main.	3800	\$9,724
239	Bare Steel Service Replacement	K.S.A. 66-2202 and KCC Docket No. 11-KGS-177-TAR	9/16/2024	3721	054	013069	Main Replacement - 803 N Sheridan, Wichita - Retire 60' of 2" APCS main due to BS service line tap located under a tree. Relocate and install 60' of 2" APCS main.	3765	\$10,985
	Bare Steel Service Replacement Total								\$389,181
240	Cathodic Protection	192.455 and/or 192.457	10/29/2024	3532	053	010089	Rectifier Replacement - 6th & Hatfield, Hiawatha - Retire existing obsolete rectifier attached to a pole leaning in a unsafe position. Install new Universal ASAI 30-20 ABCMWZ rectifier.	3765	\$12,347
241	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3761	053	010254	Rectifier and Groundbed Replacement - 10th & Park, Baxter Springs - Retire existing obsolete rectifier and groundbed no longer providing adequate cathodic protection. Install new 5 anode groundbed and Universal ASAI 20-15 ABCWZ rectifier.	3765	\$25,482
242	Cathodic Protection	192.455 and/or 192.457	1/15/2025	3631	053	010270	Rectifier & Groundbed Replacement - Ave F & Washington, South Hutchinson - Replace existing depleted ground bed and obsolete rectifier. Install new 6 MMO anodes and ASAI 15-30ABCRW rectifier.	3765	\$33,359
243	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3621	054	010370	Rectifier and Groundbed Replacement - 11th & Kansas, Russell - Retire existing obsolete rectifier and groundbed due to cathodic deficiency. Install new Universal ASAI 30-30 ABCRW rectifier and 10 anode groundbed.	3765	\$61,496
244	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3621	054	010371	Rectifier and Groundbed Replacement - Margret & Culp, Russell - Retire existing obsolete rectifier and groundbed due to cathodic deficiency. Relocate & install new Universal ASAI 30-30 ABCRW rectifier and 10 anode groundbed.	3765	\$44,236
245	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3621	054	010372	Rectifier and Groundbed Replacement - 5th & Sietz, Russell - Retire existing obsolete rectifier and groundbed due to cathodic deficiency. Relocate & install new Universal ASAI 30-30 ABCRW rectifier and 10 anode groundbed.	3765	\$52,431
246	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3621	054	010373	Rectifier and Groundbed Replacement - Iron & Ash, Russell - Retire existing obsolete rectifier and groundbed due to cathodic deficiency. Relocate & install new Universal ASAI 30-30 ABCRW rectifier and 10 anode groundbed.	3765	\$76,953
247	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3721	054	013119	Groundbed & Rectifier Replacement - Kansas & Buss, Oxford - Replace existing depleted groundbed and obsolete rectifier due to cathodic deficiency. Install new Universal ASAI 30-30 rectifier and 10 anode groundbed.	3765	\$54,296
248	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3721	054	013120	Groundbed & Rectifier Replacement - 7th & Jackson, Harper - Replace existing depleted groundbed and obsolete rectifier due to cathodic deficiency. Install new Universal ASAI 30-30 rectifier and 10 anode groundbed.	3765	\$50,797
249	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3721	054	013121	Groundbed & Rectifier Installation - 3rd & Holmes, Kiowa - Install new Universal ASAI 30-30 ABCRW rectifier and install 12 anode groundbed to clear cathodic deficiencies.	3765	\$67,181
250	Cathodic Protection	192.455 and/or 192.457	2/25/2025	3721	054	013125	Groundbed & Rectifier Replacement - Vine & Ohio, Oxford - Replace existing depleted groundbed and obsolete rectifier to clear cathodic deficiency. Install new Universal ASAI 30-30 rectifier and 5 anode groundbed.	3765	\$39,728
	Cathodic Protection Total								\$518,306
251	Continuing Surveillance	192.613 (b)	2/28/2025	3612	046	010128	ILI Upgrades - Transmission Line P0818, Wamego - Install new ILI facilities on line P0818 to allow for inspection. Inspect existing facilities to ensure safe passage of in-line inspection tools.	3670	\$986,605
252	Continuing Surveillance	192.613 (b)	2/26/2025	3685	043	010155	Survey, Row & Permitting - Transmission Line P1206, Great Bend - Survey, ROW, & Permitting for the casing removal on line P1206.	3670	\$18,428
253	Continuing Surveillance	192.613 (b)	2/26/2025	3685	043	010155	Survey, Row & Permitting - Transmission Line P1206, Great Bend - Survey, ROW, & Permitting for the casing removal on line P1206.	3690	\$1,264

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
254	Continuing Surveillance	192.613 (b)	2/25/2025	3685	043	010161	Transmission Pipe Replacement - Transmission Line P1206, Great Bend - Retire 402' of 12" BS transmission pipe and existing casing with intermittent history of shorted casing. Install 385' of new 12" dual coated steel highway crossing.	3670	\$263,791
255	Continuing Surveillance	192.613 (b)	2/25/2025	3685	043	010161	Transmission Pipe Replacement - Transmission Line P1206, Great Bend - Retire 402' of 12" BS transmission pipe and existing casing with intermittent history of shorted casing. Install 385' of new 12" dual coated steel highway crossing.	3690	\$18,096
256	Continuing Surveillance	192.613 (b)	2/25/2025	3685	043	010161	Transmission Pipe Replacement - Transmission Line P1206, Great Bend - Retire 402' of 12" BS transmission pipe and existing casing with intermittent history of shorted casing. Install 385' of new 12" dual coated steel highway crossing.	3820	\$5,272
257	Continuing Surveillance	192.613 (b)	3/3/2025	3685	044	010165	Survey, Permitting, & Exhibit Drawings - Transmission Line P0212, Pratt Transmission, Buhler - Topographic survey, plan view and exhibit drawings, and permits to detail the area for the 3.2 mile pipe replacement of line P0212 to Buhler.	3662	\$6,949
258	Continuing Surveillance	192.613 (b)	3/3/2025	3685	044	010165	Survey, Permitting, & Exhibit Drawings - Transmission Line P0212, Pratt Transmission, Buhler - Topographic survey, plan view and exhibit drawings, and permits to detail the area for the 3.2 mile pipe replacement of line P0212 to Buhler.	3670	\$229,545
259	Continuing Surveillance	192.613 (b)	3/3/2025	3685	044	010165	Survey, Permitting, & Exhibit Drawings - Transmission Line P0212, Pratt Transmission, Buhler - Topographic survey, plan view and exhibit drawings, and permits to detail the area for the 3.2 mile pipe replacement of line P0212 to Buhler.	3690	\$3,113
260	Continuing Surveillance	192.613 (b)	9/19/2024	3653	054	010167	Install 80' 2" APCs. Retire 80' 2" APCs. E 3rd St between Dewey and Elm, Vermillion KS. This work is to lower a section of exposed main in an alleyway entrance.	3765	\$9,495
261	Continuing Surveillance	192.613 (b)	2/25/2025	3653	053	010170	Install 155' 4" PE. Retire 1110' 4" BS. 300 Genesee St, Blue Rapids KS. This project is to address shallow main that was found due to an exposed tap. This also replaces low pressure bare steel main that runs parallel to intermediate pressure main in the process.	3760	\$12,235
262	Continuing Surveillance	192.613 (b)	2/25/2025	3653	053	010170	Install 155' 4" PE. Retire 1110' 4" BS. 300 Genesee St, Blue Rapids KS. This project is to address shallow main that was found due to an exposed tap. This also replaces low pressure bare steel main that runs parallel to intermediate pressure main in the process.	3769	\$1,808
263	Continuing Surveillance	192.613 (b)	2/25/2025	3653	053	010170	Install 155' 4" PE. Retire 1110' 4" BS. 300 Genesee St, Blue Rapids KS. This project is to address shallow main that was found due to an exposed tap. This also replaces low pressure bare steel main that runs parallel to intermediate pressure main in the process.	3800	\$372
264	Continuing Surveillance	192.613 (b)	2/25/2025	3612	043	010195	MAOP Reconfirmation - Transmission Line P0818 - Hydrotest of approximately 1,000' of Line P0818 for MAOP Reconfirmation to be in compliance with PHMSA MEGA Rule 1.	3670	\$198,122
265	Continuing Surveillance	192.613 (b)	2/25/2025	3612	043	010195	MAOP Reconfirmation - Transmission Line P0818 - Hydrotest of approximately 1,000' of Line P0818 for MAOP Reconfirmation to be in compliance with PHMSA MEGA Rule 1.	3690	\$115,498
266	Continuing Surveillance	192.613 (b)	3/3/2025	3685	046	010227	Survey, ROW Acquisition, and Permitting - Transmission Line P0853, Loretta - Survey, ROW Acquisition, and Permitting for the 2023 planned work project of IJI Installations of line P0853.	3670	\$22,317
267	Continuing Surveillance	192.613 (b)	2/25/2025	3685	046	010228	IJI Installations - Transmission Line P0853, Loretta - Install IJI facilities on line P0853 at MP 8.5 after recent exposures found corrosion and coating anomalies on segments constructed of reclaimed/refurbished pipe.	3652	\$1,200
268	Continuing Surveillance	192.613 (b)	2/25/2025	3685	046	010228	IJI Installations - Transmission Line P0853, Loretta - Install IJI facilities on line P0853 at MP 8.5 after recent exposures found corrosion and coating anomalies on segments constructed of reclaimed/refurbished pipe.	3670	\$717,904
269	Continuing Surveillance	192.613 (b)	2/25/2025	3521	054	010259	Retire 4' 4" PE main. 709 S Cedar St, Ottawa. Install 4' 4" PE main. This work is to permanently repair a class 1 leak.	3760	\$2,984
270	Continuing Surveillance	192.613 (b)	8/28/2024	3621	054	010360	PVC Main Replacement - NE 70 & Hwy 281, St John - Retire 200' of 2" PVC main due to leak on existing main segment. Install 200' of 2" PE main.	3760	\$4,333
271	Continuing Surveillance	192.613 (b)	2/25/2025	3621	054	010365	Main Replacement - 2112 McKinley, Great Bend - Retire 30' of 2" CS to permanently repair and replace a leak on existing main segment. Install 30' of 2" CS.	3765	\$6,836
272	Continuing Surveillance	192.613 (b)	2/25/2025	3612	044	010404	Transmission Pipe Replacement - P0212 & P0496, Buhler TBS to Medora TBS - Retire 3.2 miles of 2" CS transmission pipe lacking sufficient material and test documentation for establishing MAOP. Install 3.2 miles of 4" CS transmission pipe. Project is part of the 2023 annual work plan	3662	\$38,131
273	Continuing Surveillance	192.613 (b)	2/25/2025	3612	044	010404	Transmission Pipe Replacement - P0212 & P0496, Buhler TBS to Medora TBS - Retire 3.2 miles of 2" CS transmission pipe lacking sufficient material and test documentation for establishing MAOP. Install 3.2 miles of 4" CS transmission pipe. Project is part of the 2023 annual work plan	3670	\$1,259,648
274	Continuing Surveillance	192.613 (b)	2/25/2025	3612	044	010404	Transmission Pipe Replacement - P0212 & P0496, Buhler TBS to Medora TBS - Retire 3.2 miles of 2" CS transmission pipe lacking sufficient material and test documentation for establishing MAOP. Install 3.2 miles of 4" CS transmission pipe. Project is part of the 2023 annual work plan	3690	\$17,083
275	Continuing Surveillance	192.613 (b)	2/26/2025	3612	044	010413	Farm Tap Replacement - 1174 Hwy 18, Abilene - Replace above ground setting due to leak on existing riser valve. Install new above ground setting and a portion of the inlet riser.	3690	\$14,003
276	Continuing Surveillance	192.613 (b)	12/2/2024	3541	054	010770	Retire 581' 1.25" PE and 230' 2" CS Main. SE 25th St and Bellview St, Topeka, KS. Install 1,600' 2" PE Main. This project is a main replacement that will occur due to poor and leaking main being discovered during BS service replacements in the complex. The main is found to be only threaded pipe, with leaks being discovered every time a new tap is uncovered.	3760	\$119,058
277	Continuing Surveillance	192.613 (b)	12/2/2024	3541	054	010770	Retire 581' 1.25" PE and 230' 2" CS Main. SE 25th St and Bellview St, Topeka, KS. Install 1,600' 2" PE Main. This project is a main replacement that will occur due to poor and leaking main being discovered during BS service replacements in the complex. The main is found to be only threaded pipe, with leaks being discovered every time a new tap is uncovered.	3800	\$50,026
278	Continuing Surveillance	192.613 (b)	12/2/2024	3541	054	010770	Retire 581' 1.25" PE and 230' 2" CS Main. SE 25th St and Bellview St, Topeka, KS. Install 1,600' 2" PE Main. This project is a main replacement that will occur due to poor and leaking main being discovered during BS service replacements in the complex. The main is found to be only threaded pipe, with leaks being discovered every time a new tap is uncovered.	3820	\$6,883
279	Continuing Surveillance	192.613 (b)	12/2/2024	3541	054	010770	Retire 581' 1.25" PE and 230' 2" CS Main. SE 25th St and Bellview St, Topeka, KS. Install 1,600' 2" PE Main. This project is a main replacement that will occur due to poor and leaking main being discovered during BS service replacements in the complex. The main is found to be only threaded pipe, with leaks being discovered every time a new tap is uncovered.	3830	\$1,011
280	Continuing Surveillance	192.613 (b)	9/19/2024	3522	054	011780	Retire 15' 8" CS Main. 5th St & Cheyenne St, Kansas City, KS. Install 20' 8" CS Main and 8" Gate Valve. This work is done to relocate the RO valve for DRS 2001-2010 located at 5th and Cheyenne in KCK.	3765	\$30,095
281	Continuing Surveillance	192.613 (b)	2/25/2025	3522	054	011796	Install 250' 4" PE. Retire 220' 4" BS; 30' 4" CS. 3132 Puckett Rd, Kansas City, KS. This work is to resolve a class 1 leak by fully replacing a section of bare steel main.	3760	\$48,518
282	Continuing Surveillance	192.613 (b)	2/25/2025	3522	054	011796	Install 250' 4" PE. Retire 220' 4" BS; 30' 4" CS. 3132 Puckett Rd, Kansas City, KS. This work is to resolve a class 1 leak by fully replacing a section of bare steel main.	3800	\$471
283	Continuing Surveillance	192.613 (b)	8/28/2024	3522	054	011798	Retire 30' 2" CS Main. 6535 Burnham Dr, Mission, KS. Install 30' 2" CS Main. This work is to permanently repair a class 3 leak on a leaking dresser coupling.	3765	\$10,225
284	Continuing Surveillance	192.613 (b)	9/19/2024	3522	054	011809	Retire 20' 4" CS & 10' 2" CS main. 74th St & Bond St, Shawnee, KS. Install 20' 4" CS & 10' 2" CS main. This work order is to install a dog leg to permanently repair a class 1 leak.	3765	\$15,492
285	Continuing Surveillance	192.613 (b)	2/25/2025	3522	054	011815	Retire 76' 2" CS and 5' 2" BS main. 53rd St & Walmer St, Mission, KS. Install 90' 2" CS main. Install main dog leg to permanently repair a class 3 leak.	3760	\$122,129
286	Continuing Surveillance	192.613 (b)	1/15/2025	3522	053	012556	Retire 700' 6" CS main. W 64th St & Monticello Rd, Shawnee, KS. Install 700' 6" CS main. The 6" CS main is exposed on the West side of Monticello within a creek bed. Relocate the section of pipe deeper so that it is not exposed.	3760	\$2,230
287	Continuing Surveillance	192.613 (b)	1/15/2025	3522	053	012556	Retire 700' 6" CS main. W 64th St & Monticello Rd, Shawnee, KS. Install 700' 6" CS main. The 6" CS main is exposed on the West side of Monticello within a creek bed. Relocate the section of pipe deeper so that it is not exposed.	3765	\$237,707
288	Continuing Surveillance	192.613 (b)	12/2/2024	3721	054	012918	Main Replacement - 609 N Rutland, Wichita - Retire 20' of 4" APCs due to service line tap located under a large tree. Install 20' of 4" PE main.	3760	\$23,739

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
289	Continuing Surveillance	192.613 (b)	12/2/2024	3721	054	012918	Main Replacement - 609 N Rutland, Wichita - Retire 20' of 4" APCs due to service line tap located under a large tree. Install 20' of 4" PE main.	3800	\$2,435
290	Continuing Surveillance	192.613 (b)	1/15/2025	3721	054	013065	Cast Iron Main Replacement - 10th & Lewellen, Wichita - Retire 471' of 4" CI & 105' of 2" CI main due to obsolescence. Install 460' of 2" PE main.	3760	\$902
291	Continuing Surveillance	192.613 (b)	1/15/2025	3721	054	013065	Cast Iron Main Replacement - 10th & Lewellen, Wichita - Retire 471' of 4" CI & 105' of 2" CI main due to obsolescence. Install 460' of 2" PE main.	3765	\$2,158
292	Continuing Surveillance	192.613 (b)	1/15/2025	3721	054	013065	Cast Iron Main Replacement - 10th & Lewellen, Wichita - Retire 471' of 4" CI & 105' of 2" CI main due to obsolescence. Install 460' of 2" PE main.	3800	\$82,240
293	Continuing Surveillance	192.613 (b)	1/15/2025	3721	054	013065	Cast Iron Main Replacement - 10th & Lewellen, Wichita - Retire 471' of 4" CI & 105' of 2" CI main due to obsolescence. Install 460' of 2" PE main.	3820	\$4,119
294	Continuing Surveillance	192.613 (b)	1/15/2025	3721	054	013065	Cast Iron Main Replacement - 10th & Lewellen, Wichita - Retire 471' of 4" CI & 105' of 2" CI main due to obsolescence. Install 460' of 2" PE main.	3830	\$3,318
	Continuing Surveillance Total								\$4,717,790
295	Physical Security		9/19/2024	3557	094	010608	Internal labor, material and programming for one additional door to secure this disaster recovery space for the Dispatch group.	3901	\$4,065
296	Physical Security		1/27/2025	3557	094	010630	Labor to remove and replace (1) existing door, glazing, frames and all electrical and hardware associated with access control.	3901	\$5,983
297	Physical Security		1/27/2025	3557	094	010631	Labor to remove and replace (1) existing door, glazing, frames and all electrical and hardware associated with access control.	3901	\$6,850
	Physical Security Total								\$16,898
298	Pipeline System Components	192.613 (b)	10/29/2024	3522	054	011814	Abandon 20' 6" CS main. 6217 Holliday Dr, Kansas City, KS. Install 20' 6" CS main. There's a grade 2 leak on the valve North of the intersection of S 63rd St & Holliday Dr. The valve isn't capable of being packed and will need to be replaced on a new dogleg.	3765	\$4,232
299	Pipeline System Components	192.613 (b)	10/29/2024	3522	054	011814	Abandon 20' 6" CS main. 6217 Holliday Dr, Kansas City, KS. Install 20' 6" CS main. There's a grade 2 leak on the valve North of the intersection of S 63rd St & Holliday Dr. The valve isn't capable of being packed and will need to be replaced on a new dogleg.	3820	\$12,030
300	Pipeline System Components	192.613 (b)	10/29/2024	3522	054	011814	Abandon 20' 6" CS main. 6217 Holliday Dr, Kansas City, KS. Install 20' 6" CS main. There's a grade 2 leak on the valve North of the intersection of S 63rd St & Holliday Dr. The valve isn't capable of being packed and will need to be replaced on a new dogleg.	3830	\$3
301	Pipeline System Components	192.613 (b)	2/3/2025	3721	054	012942	Station Piping & Gasket Replacement - 17th & Charles, Wichita - Replace leaking gasket on inlet riser valve and leaking outlet station piping on DRS.	3780	\$5,225
302	Pipeline System Components	K.S.A. 66-2202		3612	048	010002	**SCOPE**Replace regulators at the Hesston Wholesale TBS W0281 and the relief valve at the Hesston ML Reg X0492 prior to acquisition.	3670	\$5,147
303	Pipeline System Components	K.S.A. 66-2202		3612	048	010002	**SCOPE**Replace regulators at the Hesston Wholesale TBS W0281 and the relief valve at the Hesston ML Reg X0492 prior to acquisition.	3690	\$13,089
304	Pipeline System Components	K.S.A. 66-2202	11/13/2024	3668	053	010020	Location: BLDG 223 - 223 Pleasanton - Fort Riley, KS Install: D1000 Meter Set Retire: Romet 3000 Meter Set Details: This CUE is to replace an existing ROMET 3000 rotary meter with a D1000 meter set.	3810	\$1,564
305	Pipeline System Components	K.S.A. 66-2202	11/13/2024	3668	053	010020	Location: BLDG 223 - 223 Pleasanton - Fort Riley, KS Install: D1000 Meter Set Retire: Romet 3000 Meter Set Details: This CUE is to replace an existing ROMET 3000 rotary meter with a D1000 meter set.	3820	\$540
306	Pipeline System Components	K.S.A. 66-2202	8/28/2024	3671	047	010037	Scope: Replace antiquated Gas Detection Equipment at the Calista Compressor Station with updated LEL sensors and heads that we have installed at our other compressor station sites. The current LEL system is obsolete and replacement parts are no longer available.	3680	\$74,411
307	Pipeline System Components	K.S.A. 66-2202	1/28/2025	3641	056	010094	RMU & Permacell Installations - Kansas NW Area - Install 22 RMUs for existing rectifiers and 20 permacells.	3970	\$121,620
308	Pipeline System Components	K.S.A. 66-2202	1/15/2025	3621	053	010173	SCADA Upgrades - Great Bend Service Area - Replace existing obsolete analog pressure charts with new SCADA so pressures can be tracked and monitored remotely.	3970	\$44,447
309	Pipeline System Components	K.S.A. 66-2202	12/16/2024	3685	044	010174	Reinforcement Sleeve Installations - Pratt Transmission - Install multiple reinforcement sleeves on transmission lines P2401 & P2404 after validation digs revealed exterior metal loss.	3670	\$133,457
310	Pipeline System Components	K.S.A. 66-2202	8/28/2024	3521	053	010191	Upgrade and move 15 pressure sites in the Ottawa area from the Talon server to UCOS. Equipment is for larger solar panel and battery box to house surge suppressive equipment. This will allow continuous monitoring of these 15 sites.	3780	\$18,643
311	Pipeline System Components	K.S.A. 66-2202	2/26/2025	3641	053	010245	Regulator Replacement - 1000 Schippel Dr, Salina - Retire antiquated 2" Rockwell regulator due to obsolescence. Install 2" American 1813, B regulator. Project worked in conjunction with the BS service line replacement at the same address.	3820	\$279
312	Pipeline System Components	K.S.A. 66-2202	2/26/2025	3641	053	010245	Regulator Replacement - 1000 Schippel Dr, Salina - Retire antiquated 2" Rockwell regulator due to obsolescence. Install 2" American 1813, B regulator. Project worked in conjunction with the BS service line replacement at the same address.	3830	\$247
313	Pipeline System Components	K.S.A. 66-2202	1/15/2025	3631	053	010264	SCADA Equipment Replacements - SW Area, Kansas - Replace and upgrade 24 sites across the SW area with archaic technology and install new MIWIs to comply with ONE Gas policy regarding cybersecurity. Replace SCADA equipment at 24 sites in the SW region of KGS to comply with ONE Gas policy.	3970	\$168,201
314	Pipeline System Components	K.S.A. 66-2202	12/2/2024	3642	054	010407	DRS Valve Replacement - Washington & New York, Smith Center - Remove and replace leaking inlet riser valve on DRS 2706-0007 due to broken valve stem. Install 2" ball valve.	3805	\$1,104
315	Pipeline System Components	K.S.A. 66-2202	2/25/2025	3642	054	010408	DRS Riser Valves Replacements - 3rd & Roger Barta, Smith Center - Retire leaking inlet & outlet riser on DRS. Install two new DRS riser valves.	3765	\$12,018
316	Pipeline System Components	K.S.A. 66-2202	2/25/2025	3642	054	010408	DRS Riser Valves Replacements - 3rd & Roger Barta, Smith Center - Retire leaking inlet & outlet riser on DRS. Install two new DRS riser valves.	3780	\$15,811
317	Pipeline System Components	K.S.A. 66-2202	2/25/2025	3631	054	010479	Main Installation - Buhler TBS, Buhler - Install 35' of 4" PE main to reconnect to the new outlet of the Buhler TBS. Associated with transmission line replacement.	3760	\$10,955
318	Pipeline System Components	K.S.A. 66-2202	1/15/2025	3541	053	010490	Install 9 meter manifold. Retire 9 meter manifold. 2131 SW High Ave, Topeka KS. This work is to move an existing meter manifold out of a basement.	3805	\$14,166
319	Pipeline System Components	K.S.A. 66-2202	1/15/2025	3541	053	010490	Install 9 meter manifold. Retire 9 meter manifold. 2131 SW High Ave, Topeka KS. This work is to move an existing meter manifold out of a basement.	3820	\$869
320	Pipeline System Components	K.S.A. 66-2202	1/15/2025	3541	053	010490	Install 9 meter manifold. Retire 9 meter manifold. 2131 SW High Ave, Topeka KS. This work is to move an existing meter manifold out of a basement.	3830	\$3
321	Pipeline System Components	K.S.A. 66-2202	8/28/2024	3541	053	010514	Replace pressure chart equipment at 12 locations. 127 E 12th, Horton. 103 E 4th, Holton. 2049 175th Rd, Wathena. Harrison and Paramount, Sabetha. 100 S 9th Sabetha. 203 N 12th, Elwood. Hwy 238 and Roseport, Elwood. 605 Utah, Hiawatha. 4308 Auburn Rd, Topeka. 21st and Urish, Topeka. K4 and 31st, Topeka. K4 and 40, Topeka.	3970	\$99,861
322	Pipeline System Components	K.S.A. 66-2202	2/25/2025	3541	054	010805	Install 10' 4" CS, 20' 2" CS. Retire 10' 4" CS, 20' 2" CS. S East Ave and Boone, Scranton KS. This project is to replace an inoperable valve.	3765	\$43,030
323	Pipeline System Components	K.S.A. 66-2202	2/25/2025	3721	053	011599	Relocate & Replace Pressure Chart - 21st & Sagebrush, Wichita - Replace and relocate the existing obsolete paper chart at 12345 E 21st St. Install new dual path, solar powered, SCADA to allow upstream and downstream pressure monitoring.	3970	\$1,998

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
324	Pipeline System Components	K.S.A. 66-2202	12/2/2024	3721	053	011704	Pressure Chart Upgrades - Wichita Metro Area - Replace the 43 remaining antiquated Eagle Research Pressure monitoring sites with MIWI-350s. 2023 Wichita Pressure Chart Upgrades This work aims to eliminate the remaining antiquated Eagle Research Pressure monitoring sites in the Wichita Metro Area and upgrade them to the MIWI-350.	3970	\$381,537
325	Pipeline System Components	K.S.A. 66-2202	10/29/2024	3721	053	011714	Obsolete Meter & Regulator Replacement - 4700 S Palisade, Wichita - Retire existing 2" regulator and Roots 5M meter due to obsolescence. Install Roots 3M meter and 2" American 1813_B regulator. Worked in conjunction with the BS service line renewal at the same address.	3820	\$660
326	Pipeline System Components	K.S.A. 66-2202	10/29/2024	3721	053	011714	Obsolete Meter & Regulator Replacement - 4700 S Palisade, Wichita - Retire existing 2" regulator and Roots 5M meter due to obsolescence. Install Roots 3M meter and 2" American 1813_B regulator. Worked in conjunction with the BS service line renewal at the same address.	3830	\$1,915
327	Pipeline System Components	K.S.A. 66-2202	12/2/2024	3522	054	011805	Retire 10" 2" PE Main and 2" Ball Valve. N Center St and E Westhoff Pl, Gardner, KS. Install 10" 2" PE Main and 2" Ball Valve. This work is being done to replace a damaged essential valve.	3760	\$9,374
328	Pipeline System Components	K.S.A. 66-2202	12/2/2024	3721	053	011833	SCADA Upgrades - Wichita - Replace and upgrade 9 sites with obsolete ControlWave Micro flow computers with new FB3000 in order to meet the TSA requirement to replace obsolete equipment that is no longer supported by the manufacturer.	3970	\$102,013
329	Pipeline System Components	K.S.A. 66-2202	2/25/2025	3721	053	011876	SCADA Upgrades - Wichita Area - Replace and upgrade ten sites with obsolete ControlWave Micro flow computers. Install new FB3000 to meet the TSA requirement of replacing obsolete equipment that is no longer supported by the manufacturer.	3970	\$147,763
330	Pipeline System Components	K.S.A. 66-2202	10/31/2024	3522	053	012506	Replace and upgrade obsolete ControlWave Micro flow computers with new FB3000. This meets the TSA requirement to replace obsolete equipment that is no longer supported by the manufacturer. 13 sites in the Overland Park area.	3970	\$158,225
331	Pipeline System Components	K.S.A. 66-2202	2/25/2025	3522	053	012509	2024 pressure chart SCADA upgrades for 45 sites in the Kansas City metro area.	3970	\$360,249
332	Pipeline System Components	K.S.A. 66-2202	2/3/2025	3522	053	012544	Install 23 Pressure Monitors for SCADA. This work is being done to replace obsolete pressure monitoring sites around the Overland Park area that do not meet TSA requirements.	3790	\$161,503
333	Pipeline System Components	K.S.A. 66-2202	2/26/2025	3522	053	012598	Replace and upgrade obsolete ControlWave Micro flow computers with new FB3000 SCADA. This meets the TSA requirement to replace obsolete equipment that is no longer supported by the manufacturer.	3970	\$107,466
334	Pipeline System Components	K.S.A. 66-2202	10/29/2024	3522	053	012644	Retire existing 2" S203 regulator. 4900 W 119th St, Overland Park, KS. Install 2" CS800IQ regulator. The existing regulator is being replaced due to an above grade leak. The existing regulator is venting and not working properly.	3820	\$346
335	Pipeline System Components	K.S.A. 66-2202	10/29/2024	3522	053	012644	Retire existing 2" S203 regulator. 4900 W 119th St, Overland Park, KS. Install 2" CS800IQ regulator. The existing regulator is being replaced due to an above grade leak. The existing regulator is venting and not working properly.	3830	\$1,086
Pipeline System Components Total									\$2,235,085
336	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	2/25/2025	3616	044	010001	Controls Upgrade - Marysville Compressor Station - Replace antiquated controls and PLC logic equipment with up to date industry standard PLC's that meet the TSA guidelines for security and firmware updates. The new equipment mirrors our most current facility upgrades at our Compressor sites.	3970	\$152,793
337	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3635	053	010149	Obsolete Meter & Corrector Replacement - 304 S Main, Roxbury - Retire obsolete AL800 meter and corrector due to failed internal components on existing MiniATC corrector. Install new Roots5M meter and EC-350 corrector.	3810	\$3,821
338	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3635	053	010149	Obsolete Meter & Corrector Replacement - 304 S Main, Roxbury - Retire obsolete AL800 meter and corrector due to failed internal components on existing MiniATC corrector. Install new Roots5M meter and EC-350 corrector.	3820	\$3
339	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	2/25/2025	3642	053	010163	TBS Regulator Replacement - DRS 2725-0021 - 1570 Ave JJ, Ellsworth - Replace existing 2" Sensus 441-57s regulator due to the regulator having obsolete components and binding causing the regulator to delay in finding set point. Install 2" Sensus 441-57s regulator.	3790	\$15,110
340	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	8/28/2024	3621	053	010182	DRS Rebuild - 15th & Peace, La Crosse - Retire obsolete 2" Fisher 99 regulator, two Fisher 289H relief valves, and two antiquated riser valves. Install new 2" Itron CL34-2 regulator, 1" Fisher 289H relief and two new riser plug valves.	3780	\$3,732
341	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	1/15/2025	3621	053	010185	Meter & Regulator Replacement - 75 E State Road 4, Holsington - Retire existing 2" Itron CL34_2 regulator and vintage Roots 5M meter due to decreased gas usage and obsolescence. Install new AL 425 meter and 1" American 1813c regulator.	3820	\$337
342	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	1/15/2025	3621	053	010185	Meter & Regulator Replacement - 75 E State Road 4, Holsington - Retire existing 2" Itron CL34_2 regulator and vintage Roots 5M meter due to decreased gas usage and obsolescence. Install new AL 425 meter and 1" American 1813c regulator.	3830	\$18
343	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3641	053	010230	Obsolete Meter Replacement - 118 N 9th, Salina - Retire existing Roots 3M meter located in vault. Install new Roots 3M meter.	3820	\$1,485
344	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3641	053	010230	Obsolete Meter Replacement - 118 N 9th, Salina - Retire existing Roots 3M meter located in vault. Install new Roots 3M meter.	3830	\$4,110
345	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	10/29/2024	3641	053	010243	Meter & Regulator Replacement - 601 N Buckeye, Abilene - Retire existing vintage Romet meter and obsolete Fisher regulator. Install new Roots 3M meter, 1.25" American 1813HC regulator, & 1" Fisher 289L relief.	3820	\$1,161
346	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	10/29/2024	3641	053	010243	Meter & Regulator Replacement - 601 N Buckeye, Abilene - Retire existing vintage Romet meter and obsolete Fisher regulator. Install new Roots 3M meter, 1.25" American 1813HC regulator, & 1" Fisher 289L relief.	3830	\$175
347	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	2/25/2025	3641	053	010246	DRS Reg Replacement - DRS 3701-0057 - Elmhurst & Ohio, Salina - Replace existing 2" Fisher 99 due to obsolescence. Install 2" Itron CL34-2M.	3780	\$3,249
348	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	12/31/2024	3642	054	010421	Obsolete Regulator Replacement - 6th & School, Lincoln - Retire obsolete regulator on DRS 2718-0011 due to internal failed components causing regulator to not lock-up. Install new 1" Iton CL31-N regulator.	3780	\$1,438
349	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	2/3/2025	3641	054	010443	DRS Replacement - 4th & Cloud, Salina - Retire DRS 3701-0034 due to the regulator failing, causing the full relief to activate. Install new DRS components including two 2" Fisher 133-HP regulators and two 1" 289H reliefs.	3769	\$657
350	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	2/3/2025	3641	054	010443	DRS Replacement - 4th & Cloud, Salina - Retire DRS 3701-0034 due to the regulator failing, causing the full relief to activate. Install new DRS components including two 2" Fisher 133-HP regulators and two 1" 289H reliefs.	3780	\$136,186
351	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	1/15/2025	3541	053	010522	Install Becker VRP-175-SB-CH Pilots. Retire old Wizard Pilots. Hwy 40 and K4, Topeka KS. This work is to replace old equipment at one of the Topeka Town Border stations with more modern equipment to increase system reliability.	3790	\$6,668
352	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	1/15/2025	3541	053	010522	Install Becker VRP-175-SB-CH Pilots. Retire old Wizard Pilots. Hwy 40 and K4, Topeka KS. This work is to replace old equipment at one of the Topeka Town Border stations with more modern equipment to increase system reliability.	3970	\$7,733
353	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	10/29/2024	3541	054	010798	Install 1 1/4" CS400IR regulator. Retire existing regulator. 1313 SW 21st St, Topeka KS. This work is to replace a leaking hairpin regulator.	3820	\$649
354	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	10/29/2024	3541	054	010798	Install 1 1/4" CS400IR regulator. Retire existing regulator. 1313 SW 21st St, Topeka KS. This work is to replace a leaking hairpin regulator.	3830	\$1,076
355	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3522	054	011757	Retire inlet and outlet risers at the district regulator station. 7500 Eby Ave, Overland Park, KS. Install new inlet and outlet risers to remove all of the threaded connections and replace with welded connections. This work is being completed to repair the class 3 leak on the bypass.	3760	\$63

Line No.	Qualification	Regulation	Unitization Date	Cost Center	Function	Job Order	Description	FERC	Addition
356	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3522	054	011757	Retire inlet and outlet risers at the district regulator station. 7500 Eby Ave, Overland Park, KS. Install new inlet and outlet risers to remove all of the threaded connections and replace with welded connections. This work is being completed to repair the class 3 leak on the bypass.	3780	\$17,079
357	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3522	054	011757	Retire inlet and outlet risers at the district regulator station. 7500 Eby Ave, Overland Park, KS. Install new inlet and outlet risers to remove all of the threaded connections and replace with welded connections. This work is being completed to repair the class 3 leak on the bypass.	3800	\$559
358	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	2/3/2025	3522	054	011800	Install 30' 2" CS main. Retire 2" regulator station. 3818 W 79th Ter, Prairie Village KS. This work is to resolve a leak by retiring a regulator station that is no longer in use.	3760	\$10,297
359	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	8/28/2024	3721	053	011817	Obsolete Regulator Replacement - 2820 Hoover Rd, Wichita - Retire vintage 1993, 2" slam-shut regulator due to obsolescence. Install 2" Itron B34, IMRV and 2" Fisher 289H relief.	3820	\$1,922
360	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	8/28/2024	3721	053	011817	Obsolete Regulator Replacement - 2820 Hoover Rd, Wichita - Retire vintage 1993, 2" slam-shut regulator due to obsolescence. Install 2" Itron B34, IMRV and 2" Fisher 289H relief.	3830	\$637
361	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	11/1/2024	3721	053	011879	Meter Regulator Replacement - 801 E Madison, Derby - Retire obsolete 2" Fisher 299 regulator, Roots 11M meter, and Roots 3M meter.	3820	\$6,553
362	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	11/1/2024	3721	053	011879	Meter Regulator Replacement - 801 E Madison, Derby - Retire obsolete 2" Fisher 299 regulator, Roots 11M meter, and Roots 3M meter.	3830	\$2,523
363	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3721	053	011884	Obsolete Regulator Replacement - 8125 E Kellogg, Wichita - Retire 2" antiquated regulator due to obsolescence. Install new 2" American 1813B regulator.	3820	\$419
364	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	9/19/2024	3721	053	011884	Obsolete Regulator Replacement - 8125 E Kellogg, Wichita - Retire 2" antiquated regulator due to obsolescence. Install new 2" American 1813B regulator.	3830	\$340
365	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	12/2/2024	3721	053	011902	Obsolete Regulator Replacement - 1900 E 9th St, Wichita - Retire existing 2" Fisher 99 regulator due to obsolescence. Install 2" Itron B34, IMRV regulator and 2" Fisher 289H Relief.	3820	\$1,759
366	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	12/2/2024	3721	053	011902	Obsolete Regulator Replacement - 1900 E 9th St, Wichita - Retire existing 2" Fisher 99 regulator due to obsolescence. Install 2" Itron B34, IMRV regulator and 2" Fisher 289H Relief.	3830	\$606
367	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	12/2/2024	3721	053	011912	Obsolete Meter Replacement - 1901 E 1st, Newton - Replace existing obsolete Roots 11M meter and regulator. Install new Roots 3M meter and 2" Itron B34 IMRV regulator.	3820	\$1,239
368	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	12/2/2024	3721	053	011912	Obsolete Meter Replacement - 1901 E 1st, Newton - Replace existing obsolete Roots 11M meter and regulator. Install new Roots 3M meter and 2" Itron B34 IMRV regulator.	3830	\$1,305
369	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	1/15/2025	3721	054	012606	Meter & Regulator Replacement - 901 E 45th St N, Wichita - Retire existing obsolete regulators and Roots 7M meter due to failed differential test. Install a 2" American 1813B and 2" Fisher CS820, IQ, regulator.	3820	\$693
370	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	1/15/2025	3721	054	012606	Meter & Regulator Replacement - 901 E 45th St N, Wichita - Retire existing obsolete regulators and Roots 7M meter due to failed differential test. Install a 2" American 1813B and 2" Fisher CS820, IQ, regulator.	3830	\$3,252
371	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	10/15/2024	3721	054	012962	DRS Rebuild - Kellogg and Reece, Wichita - Retire obsolete 1" Fisher regulator due to multiple above ground thread leaks. Install new Itron CL34-2 regulator and 1" 289H relief valve.	3780	\$17,108
372	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	12/2/2024	3721	054	013091	Regulator Replacement - 408 Main, Goessel - Retire obsolete 1.25" Fisher regulator due to failure and regulator venting gas. Install 2" American 1813B regulator.	3820	\$820
373	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	12/2/2024	3721	054	013091	Regulator Replacement - 408 Main, Goessel - Retire obsolete 1.25" Fisher regulator due to failure and regulator venting gas. Install 2" American 1813B regulator.	3830	\$444
374	Pressure and Measurement (obsolescence)	K.S.A. 66-2202	1/15/2025	3721	054	013138	Regulator Replacement - Harry & Handley, Wichita - Retire obsolete 2" Reynolds 8310 regulator and various DRS components due to multiple valve leaks. Install new 2" Itron CL34-2 regulator and various components on DRS.	3780	\$2,358
	Pressure and Measurement (obsolescence) Total								\$410,377
	Grand Total								\$23,950,780

Line No.	Qualification	Unitization Date	Cost Center	Function	Job Order	Description	Government Entity	FERC	Addition
1	Public Improvement	3/3/2025	3521	055	010142	Retire 33' 2" BS, 783' 3" BS, 899' 2" CS, 248' 3" CS, 279' 4" CS and 1473' 2" PE Main. 6th Street from Kelly Ave to Carr Ave, Osawatomie, KS. Install 2515' 2" PE and 305' 4" CS Main. This work is being done to eliminate conflict with the City of Osawatomie's 6th Street Improvement Project. The mains are in conflict with the grade changes and storm improvements and have to be relocated.	City of Osawatomie	3760	\$227,727
2	Public Improvement	3/3/2025	3521	055	010142	Retire 33' 2" BS, 783' 3" BS, 899' 2" CS, 248' 3" CS, 279' 4" CS and 1473' 2" PE Main. 6th Street from Kelly Ave to Carr Ave, Osawatomie, KS. Install 2515' 2" PE and 305' 4" CS Main. This work is being done to eliminate conflict with the City of Osawatomie's 6th Street Improvement Project. The mains are in conflict with the grade changes and storm improvements and have to be relocated.	City of Osawatomie	3765	\$28,448
3	Public Improvement	3/3/2025	3521	055	010142	Retire 33' 2" BS, 783' 3" BS, 899' 2" CS, 248' 3" CS, 279' 4" CS and 1473' 2" PE Main. 6th Street from Kelly Ave to Carr Ave, Osawatomie, KS. Install 2515' 2" PE and 305' 4" CS Main. This work is being done to eliminate conflict with the City of Osawatomie's 6th Street Improvement Project. The mains are in conflict with the grade changes and storm improvements and have to be relocated.	City of Osawatomie	3800	\$66,103
4	Public Improvement	2/28/2025	3521	055	010144	Retire 850' 2" BS and 200' 2" PE Main. High St from 2nd to 3rd Street, Baldwin City, KS. Install 1000' 2" PE Main. This work is being done as part of the Baldwin City Sidewalk Project. The city is adding sidewalks along High Street and as part of the project the water main was replaced and regraded the area. The new grading has left our main shallow and it needs to be replaced.	City of Baldwin City	3760	\$17,395
5	Public Improvement	2/28/2025	3521	055	010144	Retire 850' 2" BS and 200' 2" PE Main. High St from 2nd to 3rd Street, Baldwin City, KS. Install 1000' 2" PE Main. This work is being done as part of the Baldwin City Sidewalk Project. The city is adding sidewalks along High Street and as part of the project the water main was replaced and regraded the area. The new grading has left our main shallow and it needs to be replaced.	City of Baldwin City	3769	\$213
6	Public Improvement	8/15/2024	3521	055	010145	Retire 20' 2" CS Main. Indian St and 13th St, Baldwin City, KS. Install 30' 2" CS Main. This work is being done to eliminate a storm water improvement conflict on 13th St with the Baldwin City Storm Water Improvement project.	City of Baldwin City	3765	\$4,056
7	Public Improvement	12/2/2024	3521	055	010146	Retire 120' 2" CS Main. W 341st St & Osawatomie Rd, Osawatomie, KS. Install 140' 2" PE Main. It was discovered that the steel main is up against a culvert on the South side of 341st St and this can lead to corrosion issues, so the pipe will be replaced with plastic main.	City of Osawatomie	3760	\$83,767
8	Public Improvement	2/25/2025	3522	055	011323	Retire 1141' of 2" BS, 130' of 2" PE, 517' of 2" CS main. 53rd and Falmouth Rd, Fairway, KS. Install 2060' of 2" PE main. This work is being done to replace the bare steel main in the rear easement along Falmouth Rd as well as the steel main in the ROW of W 53rd St.	City of Fairway	3800	\$334,457
9	Public Improvement	2/25/2025	3522	055	011347	Abandon 480' 2" PE and 70' 6" CS main. N 11th St & State Ave, Kansas City, KS. Install 480' 2" PE main. Kansas City is separating and installing new storm water pipe and inlet boxes. Replace the gas main that is in conflict with 11 separate doglegs.	Unified Government of Wyandotte County and KCK	3760	\$113,640
10	Public Improvement	2/25/2025	3522	055	011347	Abandon 480' 2" PE and 70' 6" CS main. N 11th St & State Ave, Kansas City, KS. Install 480' 2" PE main. Kansas City is separating and installing new storm water pipe and inlet boxes. Replace the gas main that is in conflict with 11 separate doglegs.	Unified Government of Wyandotte County and KCK	3800	\$40,609
11	Public Improvement	2/25/2025	3522	055	011349	Retire 1,090' 2" PE & 30' 6" CS main. 50th St & Rene St, Shawnee, KS. Install 190' 2" PE & 30' 4" CS main. The city of Shawnee is replacing the storm water pipes along 50th St that will be in conflict with the 2" PE gas main on the south side of the road.	City of Shawnee	3765	\$282,627
12	Public Improvement	2/28/2025	3522	055	011352	Retire 305' 4" PE main. 4th St Bridge (1230 4th St), Tonganoxie, KS. Install 330' 4" PE main. The bridge at 4th St is being replaced and the existing 4" PE main will conflict with the new bridge piers.	City of Tonganoxie	3760	\$97,919
13	Public Improvement	2/25/2025	3522	055	011354	Retire 800' 2" BS, 20' 2" CS and 5' 4" BS main. W 53rd St & Outlook St, Mission, KS. Install 840' 2" PE main. This work order is to move 2" main deeper to avoid storm tube	City of Mission	3769	\$9,638
14	Public Improvement	2/25/2025	3522	055	011354	Retire 800' 2" BS, 20' 2" CS and 5' 4" BS main. W 53rd St & Outlook St, Mission, KS. Install 840' 2" PE main. This work order is to move 2" main deeper to avoid storm tube	City of Mission	3800	\$24,872
15	Public Improvement	8/28/2024	3522	055	011358	Retire 20' 2" CS and 20' 2" PE Main. 97th Pl and Ensley Ln, Leawood, KS. Install 20' 2" CS and 20' 2" PE Main. Work being done at 97th Pl and Ensley Ln due to street and storm drain construction in the area. KGS Facilities in the area interfere with new Storm drains being installed. 2 dog legs will be installed to work around the storm locations.	City of Leawood	3765	\$16,281
16	Public Improvement	2/26/2025	3522	055	011359	Retire 335' 12" CS main. 72nd St & Quivira Rd, Shawnee, KS. Install 360' 12" CS main. The city of Shawnee is installing storm water pipes and inlet boxes that will be in conflict with the steel gas main.	City of Shawnee	3769	\$2,723
17	Public Improvement	2/26/2025	3522	055	011362	Retire 130' 6" CS, 40' 4" CS, 300' 2" PE main and 2 PE service lines. 8th and Armstrong, Kansas City, KS. Install 140' 6" CS, 40' 4" CS, 300' 2" PE MAIN and 100' 3/4" PE service line. Work required to relocate the existing main due to a storm separation project. The new storm will interfere with the existing 2" PE Main and 6" CS main and will require doglegs to relocate the main. There are 2 service lines that will interfere with the new storm and will need to be relocated.	Unified Government of Wyandotte County and KCK	3760	\$64,970
18	Public Improvement	2/26/2025	3522	055	011362	Retire 130' 6" CS, 40' 4" CS, 300' 2" PE main and 2 PE service lines. 8th and Armstrong, Kansas City, KS. Install 140' 6" CS, 40' 4" CS, 300' 2" PE MAIN and 100' 3/4" PE service line. Work required to relocate the existing main due to a storm separation project. The new storm will interfere with the existing 2" PE Main and 6" CS main and will require doglegs to relocate the main. There are 2 service lines that will interfere with the new storm and will need to be relocated.	Unified Government of Wyandotte County and KCK	3765	\$104,834
19	Public Improvement	2/26/2025	3522	055	011362	Retire 130' 6" CS, 40' 4" CS, 300' 2" PE main and 2 PE service lines. 8th and Armstrong, Kansas City, KS. Install 140' 6" CS, 40' 4" CS, 300' 2" PE MAIN and 100' 3/4" PE service line. Work required to relocate the existing main due to a storm separation project. The new storm will interfere with the existing 2" PE Main and 6" CS main and will require doglegs to relocate the main. There are 2 service lines that will interfere with the new storm and will need to be relocated.	Unified Government of Wyandotte County and KCK	3800	\$7,578
20	Public Improvement	9/16/2024	3541	055	010468	Install 150' 2" PE. Retire 120' 2" PE. SW Watson Ct and Stone Ave, Topeka KS. This is a government relocation project to move facilities out of the way of a city waterline project.	City of Topeka	3800	\$9,801
21	Public Improvement	2/26/2025	3541	055	010469	Install 800' 2" PE. Retire 800' 2" PE. SE Quincy from 8th to 10th, Topeka KS. This is a government relocation project requested by the city of Topeka to relocate main ahead of a full-depth road project.	City of Topeka	3760	\$191,437
22	Public Improvement	2/26/2025	3541	055	010469	Install 800' 2" PE. Retire 800' 2" PE. SE Quincy from 8th to 10th, Topeka KS. This is a government relocation project requested by the city of Topeka to relocate main ahead of a full-depth road project.	City of Topeka	3800	\$22,810
23	Public Improvement	2/26/2025	3541	055	010470	Install 100' 2" PE. Retire 100' 2" PE. 329 SE Green, Tecumseh KS. This is a government relocation requested by Shawnee county for main in conflict with a storm structure.	Shawnee County	3760	\$31,247
24	Public Improvement	3/3/2025	3541	055	010472	Install 240' 2" CS. Retire 240' 2" CS. SE 37th and Tomahawk Dr, Tecumseh KS. This is a government relocation project requested by Shawnee county	Shawnee County	3765	\$29,413
25	Public Improvement	2/26/2025	3541	055	010473	Install 375' 2" PE, 175' 4" PE. Retire 375' 2" PE, 175' 4" PE. SW Summerfield Dr, Topeka KS. This is a government relocation project to replace main in conflict with new city storm sewer in the Summerfield neighborhood.	City of Topeka	3760	\$84,301
26	Public Improvement	2/26/2025	3541	055	010473	Install 375' 2" PE, 175' 4" PE. Retire 375' 2" PE, 175' 4" PE. SW Summerfield Dr, Topeka KS. This is a government relocation project to replace main in conflict with new city storm sewer in the Summerfield neighborhood.	City of Topeka	3800	\$15,125
27	Public Improvement	2/26/2025	3541	055	010474	Install 500' 4" PE, 130' 2" PE. Retire 380' 4" PE, 310' 2" PE. NW 46th and Greenhills, Topeka KS. This is a Government relocation project to move main for a roundabout the county is installing as part of the 46th St road project.	Shawnee County	3760	\$139,938
28	Public Improvement	2/26/2025	3541	055	010477	Install 230' 6" CS. Retire 230' 6" CS. SE 45th and Shawnee Heights Rd, Tecumseh KS. This work is a government relocation project requested by Shawnee county to move main away from a retaining wall that is needing replaced.	Shawnee County	3765	\$225,484
29	Public Improvement	2/26/2025	3631	055	010091	Government Relocation - 5th & Hutchinson, Haven - Retire 420' of 2" PE main in conflict with The City of Haven's plans for new storm water sewer. Relocate and install 360' of 2" PE main.	City of Haven	3760	\$18,509
30	Public Improvement	2/26/2025	3631	055	010091	Government Relocation - 5th & Hutchinson, Haven - Retire 420' of 2" PE main in conflict with The City of Haven's plans for new storm water sewer. Relocate and install 360' of 2" PE main.	City of Haven	3800	\$72
31	Public Improvement	10/15/2024	3642	055	010054	Government Relocation - Luray & 194th, Luray - Retire 400' 2" RPBS of a dead end main segment in conflict with the Russell County Highway Department's plans to cut grade, clear ditches, and rebuild the existing water way to allow for proper drainage. No replacement necessary. Pipe is too shallow and the county digging out waterways that would expose the main.	Russell County	3800	\$664
32	Public Improvement	10/15/2024	3642	055	010054	Government Relocation - Luray & 194th, Luray - Retire 400' 2" RPBS of a dead end main segment in conflict with the Russell County Highway Department's plans to cut grade, clear ditches, and rebuild the existing water way to allow for proper drainage. No replacement necessary. Pipe is too shallow and the county digging out waterways that would expose the main.	Russell County	3820	\$0

Line No.	Qualification	Unitization Date	Cost Center	Function	Job Order	Description	Government Entity	FERC	Addition
33	Public Improvement	10/15/2024	3642	055	010054	Government Relocation - Luray & 194th, Luray - Retire 400' 2" RPBS of a dead end main segment in conflict with the Russell County Highway Department's plans to cut grade, clear ditches, and rebuild the existing water way to allow for proper drainage. No replacement necessary. Pipe is too shallow and the county digging out waterways that would expose the main.	Russell County	3830	\$2
34	Public Improvement	12/16/2024	3642	055	010055	Government Relocation - S Mill & Hershey, Beloit - Retire 300' 2" RPBS of shallow main that is in conflict with the City of Beloit's plan's for a new sidewalk. Install 300' 2" PE.	City of Beloit	3760	\$4,078
35	Public Improvement	9/16/2024	3651	055	010193	Install 515' 4" PE. Retire 500' 4" APCs. 12th and Moro, Manhattan KS. This work was initiated by the city due to construction in the Aggieville Business Improvement District.	City of Manhattan	3760	\$80,796
36	Public Improvement	9/16/2024	3651	055	010193	Install 515' 4" PE. Retire 500' 4" APCs. 12th and Moro, Manhattan KS. This work was initiated by the city due to construction in the Aggieville Business Improvement District.	City of Manhattan	3800	\$27,560
37	Public Improvement	8/15/2024	3651	055	010194	Install 100' 2" PE. Retire 100' 2" PE. S Juliette St and Houston St, Manhattan KS. This work is a government relocation for the city moving 2" PE that is in conflict with a proposed 24" storm sewer structure.	City of Manhattan	3760	\$120,761
38	Public Improvement	1/28/2025	3721	055	010581	Government Relocation - West St, Harry to Pawnee, Wichita - Retire 2,350' of 12" RPCS, 2,620' of 10" RPCS, 540' of 10" RPBS, 1,122' of 4" RPCS and 560' of 2" PE main in conflict with the City of Wichita's West Street Improvements from Pawnee to Harry project. Install 5,450' of 12" RPCS, 1,844' of 4" PE and 160' of 2" PE main.	City of Wichita	3760	\$300,127
39	Public Improvement	1/28/2025	3721	055	010581	Government Relocation - West St, Harry to Pawnee, Wichita - Retire 2,350' of 12" RPCS, 2,620' of 10" RPCS, 540' of 10" RPBS, 1,122' of 4" RPCS and 560' of 2" PE main in conflict with the City of Wichita's West Street Improvements from Pawnee to Harry project. Install 5,450' of 12" RPCS, 1,844' of 4" PE and 160' of 2" PE main.	City of Wichita	3765	\$2,629,268
40	Public Improvement	1/28/2025	3721	055	010581	Government Relocation - West St, Harry to Pawnee, Wichita - Retire 2,350' of 12" RPCS, 2,620' of 10" RPCS, 540' of 10" RPBS, 1,122' of 4" RPCS and 560' of 2" PE main in conflict with the City of Wichita's West Street Improvements from Pawnee to Harry project. Install 5,450' of 12" RPCS, 1,844' of 4" PE and 160' of 2" PE main.	City of Wichita	3769	\$1,569
41	Public Improvement	1/28/2025	3721	055	010581	Government Relocation - West St, Harry to Pawnee, Wichita - Retire 2,350' of 12" RPCS, 2,620' of 10" RPCS, 540' of 10" RPBS, 1,122' of 4" RPCS and 560' of 2" PE main in conflict with the City of Wichita's West Street Improvements from Pawnee to Harry project. Install 5,450' of 12" RPCS, 1,844' of 4" PE and 160' of 2" PE main.	City of Wichita	3800	\$163,536
42	Public Improvement	1/28/2025	3721	055	010581	Government Relocation - West St, Harry to Pawnee, Wichita - Retire 2,350' of 12" RPCS, 2,620' of 10" RPCS, 540' of 10" RPBS, 1,122' of 4" RPCS and 560' of 2" PE main in conflict with the City of Wichita's West Street Improvements from Pawnee to Harry project. Install 5,450' of 12" RPCS, 1,844' of 4" PE and 160' of 2" PE main.	City of Wichita	3805	\$429
43	Public Improvement	11/13/2024	3721	055	010586	Scope of Work: 4" PE Gov Relocation - 87th and Cowskin Creek, Haysville Retire: 100' of 4" PE Install: 100' of 2" PE to avoid conflict with a bridge and road renewal project.	City of Haysville	3760	\$4,625
44	Public Improvement	3/3/2025	3721	055	010593	Government Relocation - Nelson Dr. and K-15, Derby - Retire 1,100' of 4" PE and 160' of 6" RPCS main in conflict with The City of Derby's plans for realigning Nelson Dr. north and south of Red Powell Rd. Install 1,050' of 2" and 160' of 6" RPCS main.	City of Derby	3760	\$100,384
45	Public Improvement	3/3/2025	3721	055	010593	Government Relocation - Nelson Dr. and K-15, Derby - Retire 1,100' of 4" PE and 160' of 6" RPCS main in conflict with The City of Derby's plans for realigning Nelson Dr. north and south of Red Powell Rd. Install 1,050' of 2" and 160' of 6" RPCS main.	City of Derby	3765	\$39,945
46	Public Improvement	12/16/2024	3721	055	010596	Government Relocation - N Olive & W High, Leon - Retire 1,600' of 1.25" RPCS main in conflict with grading cuts from the City of Leon's plans to create better drainage on N Olive St. Install 1,600' of 2" PE. Only the first 1,000' of this projects is GSRs eligible. This project is GSRs eligible but only the first 1,000', meaning only 10/16th of the project is eligible for GSRs filing.	City of Leon	3760	\$82,261
47	Public Improvement	12/16/2024	3721	055	010596	Government Relocation - N Olive & W High, Leon - Retire 1,600' of 1.25" RPCS main in conflict with grading cuts from the City of Leon's plans to create better drainage on N Olive St. Install 1,600' of 2" PE. Only the first 1,000' of this projects is GSRs eligible. This project is GSRs eligible but only the first 1,000', meaning only 10/16th of the project is eligible for GSRs filing.	City of Leon	3800	\$2,130
48	Public Improvement	12/16/2024	3721	055	010599	Government Relocation - Central Ave, Vine to Griffith, Wichita - Retire 350' of 3" RPBS and 265' of 2" PE main in conflict with the City of El Dorado's Central Ave Paving, Stormwater, and Water Improvement project. Install 810' of 2" PE main.	City of El Dorado	3760	\$71,177
49	Public Improvement	12/16/2024	3721	055	010599	Government Relocation - Central Ave, Vine to Griffith, Wichita - Retire 350' of 3" RPBS and 265' of 2" PE main in conflict with the City of El Dorado's Central Ave Paving, Stormwater, and Water Improvement project. Install 810' of 2" PE main.	City of El Dorado	3769	\$646
50	Public Improvement	12/16/2024	3721	055	010601	Government Relocation - N Prospect Ave & Alley North of Ross Ave, Clearwater - Retire 100' of 2" RPBS as part of the planned street improvement work being done by the City of Clearwater. Install 100' of 2" CS main. Install main 50' either direction of C/L of Prospect, at least 42" deep. Clear date: 6/1/2024 Test Station Asset: 90031856580 total services affected SOP = 12oz MAOP = 19oz	City of Clearwater	3765	\$18,170
51	Public Improvement	12/16/2024	3721	055	010602	Government Relocation - 53rd & Oliver, Bel Aire - Retire 1,900' of 6" PE and 25' of 2" PE main in conflict with new storm sewer during the City of Bel Aire's street replacement project at 53rd St from Oliver to Woodlawn. Install 1,900' of 6" PE and 20' of 2" PE main.	City of Bel Aire	3760	\$165,102
52	Public Improvement	3/3/2025	3721	055	010604	Government Relocation - 29th St, St. Francis to 1-135, Wichita - Retire 30' of 12" CS, 655' of 6" CS, 140' of 4" CS and 100' of 2" CS main in conflict with new storm drain and water main during The City of Wichita's 29th St N, N Broadway Ave to I-135 project. Install 30' of 12" CS, 655' of 6" CS, 140' of 4" CS, and 100' of 2" CS main.	City of Wichita	3760	\$25,987
53	Public Improvement	3/3/2025	3721	055	010604	Government Relocation - 29th St, St. Francis to 1-135, Wichita - Retire 30' of 12" CS, 655' of 6" CS, 140' of 4" CS and 100' of 2" CS main in conflict with new storm drain and water main during The City of Wichita's 29th St N, N Broadway Ave to I-135 project. Install 30' of 12" CS, 655' of 6" CS, 140' of 4" CS, and 100' of 2" CS main.	City of Wichita	3765	\$117,866
54	Public Improvement	3/3/2025	3721	055	010604	Government Relocation - 29th St, St. Francis to 1-135, Wichita - Retire 30' of 12" CS, 655' of 6" CS, 140' of 4" CS and 100' of 2" CS main in conflict with new storm drain and water main during The City of Wichita's 29th St N, N Broadway Ave to I-135 project. Install 30' of 12" CS, 655' of 6" CS, 140' of 4" CS, and 100' of 2" CS main.	City of Wichita	3800	\$17,951
55	Public Improvement	3/3/2025	3721	055	010604	Government Relocation - 29th St, St. Francis to 1-135, Wichita - Retire 30' of 12" CS, 655' of 6" CS, 140' of 4" CS and 100' of 2" CS main in conflict with new storm drain and water main during The City of Wichita's 29th St N, N Broadway Ave to I-135 project. Install 30' of 12" CS, 655' of 6" CS, 140' of 4" CS, and 100' of 2" CS main.	City of Wichita	3805	\$5,369
56	Public Improvement	3/3/2025	3721	055	010604	Government Relocation - 29th St, St. Francis to 1-135, Wichita - Retire 30' of 12" CS, 655' of 6" CS, 140' of 4" CS and 100' of 2" CS main in conflict with new storm drain and water main during The City of Wichita's 29th St N, N Broadway Ave to I-135 project. Install 30' of 12" CS, 655' of 6" CS, 140' of 4" CS, and 100' of 2" CS main.	City of Wichita	3820	\$1,601
57	Public Improvement	3/3/2025	3721	055	010604	Government Relocation - 29th St, St. Francis to 1-135, Wichita - Retire 30' of 12" CS, 655' of 6" CS, 140' of 4" CS and 100' of 2" CS main in conflict with new storm drain and water main during The City of Wichita's 29th St N, N Broadway Ave to I-135 project. Install 30' of 12" CS, 655' of 6" CS, 140' of 4" CS, and 100' of 2" CS main.	City of Wichita	3830	\$2,133
58	Public Improvement	12/2/2024	3721	055	010605	Government Relocation - Towne East Dr & Willowbrook, Wichita - Retire 415' of 4" PE main in conflict with the City of Wichita's Paving Improvements to Serve South Towne East Mall Drive project. Install 330' of 4" PE main	City of Wichita	3760	\$35,218
59	Public Improvement	2/26/2025	3721	055	010607	Government Relocation - 40th & Parkwood, Bel Aire - Retire 917' of 2" APCs and 180' of 4" APCs in conflict with new paving and drainage during The City of Bel Aire's Paving Improvements to serve Parkwood Ave & 40th St N. Install 180' of 4" PE and 920' of 2" PE.	City of Bel Aire	3769	\$2,263
60	Public Improvement	2/26/2025	3721	055	010607	Government Relocation - 40th & Parkwood, Bel Aire - Retire 917' of 2" APCs and 180' of 4" APCs in conflict with new paving and drainage during The City of Bel Aire's Paving Improvements to serve Parkwood Ave & 40th St N. Install 180' of 4" PE and 920' of 2" PE.	City of Bel Aire	3800	\$70,502
Total Public Improvement									\$6,388,113

Blanket Service Line Summary

Sum of Extended Costs		
Replacement Reason	May 2024 - February 2025	
	Cost	Line Installed
Routine Replacement - Leak - 192.703	\$ 476,652	78
Routine Replacement - Non Leaking Unprotected Pipe	\$ 9,099,156	1,489
Public Improvement	\$ 48,887	8
Grand Total	\$ 9,624,695	1,575

Non Service Line Related Blanket Summary

Other Blanket Costs	May 2024 - February 2025
	Cost
Install Anodes	\$ 1,175,054
Weld sleeve high resist couplings	\$ 292,980
Meter Blanket	\$ 11,453,246
Meter Blanket - AMR	\$ 8,698,015
Total	\$ 21,619,294

Line No. 1 Project 051.054.3541.010802 Install 160' 2" PE. Retire 150' 2" RPBS. 305 S Palmberg, Meriden KS. This work is to resolve a temporary repair for a leak. Main was too thin to weld on when the leak repair was performed, this replaced the whole section with new main.

Line No. 251 Project 051.046.3612.010128 ILI Upgrades - Transmission Line P0818, Wamego - Install new ILI facilities on line P0818 to allow for inspection. Inspect existing facilities to ensure safe passage of in-line inspection tools.

Line No.'s 252-253 Project 051.043.3685.010155 Survey, Row & Permitting - Transmission Line P1206, Great Bend - Survey, ROW, & Permitting for the casing removal on line P1206.

Line No.'s 254-256 Project 051.043.3685.010161 Transmission Pipe Replacement - Transmission Line P1206, Great Bend - Retire 402' of 12" BS transmission pipe and existing casing with intermittent history of shorted casing. Install 385' of new 12" dual coated steel highway crossing.

Line No.'s 257-259 Project 051.044.3685.010165 Survey, Permitting, & Exhibit Drawings - Transmission Line P0212, Pratt Transmission, Buhler - Topographic survey, plan view and exhibit drawings, and permits to detail the area for the 3.2 mile pipe replacement of line P0212 to Buhler.

Line No. 260 Project 051.054.3653.010167 Install 80' 2" APCS. Retire 80' 2" APCS. E 3rd St between Dewey and Elm, Vermillion KS. This work is to lower a section of exposed main in an alleyway entrance.

Line No.'s 261-263 Project 051.053.3653.010170 Install 155' 4" PE. Retire 1110' 4" BS. 300 Genesee St, Blue Rapids KS. This project is to address shallow main that was found due to an exposed tap. This also replaces low pressure bare steel main that runs parallel to intermediate pressure main in the process.

Line No.'s 264-265 Project 051.043.3612.010195 MAOP Reconfirmation - Transmission Line P0818 - Hydrotest of approximately 1,000' of Line P0818 for MAOP Reconfirmation to be in compliance with PHMSA MEGA Rule 1.

Line No.'s 266 Project 051.046.3685.010227 Survey, ROW Acquisition, and Permitting - Transmission Line P0853, Loretta - Survey, ROW Acquisition, and Permitting for the 2023 planned work project of ILI Installations of line P0853.

Line No.'s 267-268 Project 051.046.3685.010228 ILI Installations - Transmission Line P0853, Loretta - Install ILI facilities on line P0853 at MP 8.5 after recent exposures found corrosion and coating anomalies on segments constructed of reclaimed/refurbished pipe.

Line No. 269 Project 051.054.3521.010259 Retire 4' 4" PE main. 709 S Cedar St, Ottawa. Install 4' 4" PE main. This work is to permanently repair a class 1 leak.

Line No. 270 Project 051.054.3621.010360 PVC Main Replacement - NE 70 & Hwy 281, St John - Retire 200' of 2" PVC main due to leak on existing main segment. Install 200' of 2" PE main.

Line No. 271 Project 051.054.3621.010365 Main Replacement - 2112 McKinley, Great Bend - Retire 30' of 2" CS to permanently repair and replace a leak on existing main segment. Install 30' of 2" CS.

Line No.'s 272-274 Project 051.044.3612.010404 Transmission Pipe Replacement - P0212 & P0496, Buhler TBS to Medora TBS - Retire 3.2 miles of 2" CS transmission pipe lacking sufficient material and test documentation for establishing MAOP. Install 3.2 miles of 4" CS transmission pipe. Project is part of the 2023 annual work plan.

Line No. 275 Project 051.044.3612.010413 Farm Tap Replacement - 1174 Hwy 18, Abilene - Replace above ground setting due to leak on existing riser valve. Install new above ground setting and a portion of the inlet riser.

Line No.'s 276-279 Project 051.054.3541.010770 Retire 581' 1.25" PE and 230' 2" CS Main. SE 25th St and Bellview St, Topeka, KS. Install 1,600' 2" PE Main. This project is a main replacement that will occur due to poor and leaking main being discovered during BS service replacements in the complex. The main is found to be only threaded pipe, with leaks being discovered every time a new tap is uncovered.

Line No. 280 Project 051.054.3522.011780 Retire 15' 8" CS Main. 5th St & Cheyenne St, Kansas City, KS. Install 20' 8" CS Main and 8" Gate Valve. This work is done to relocate the remote outlet valve for DRS 2001-2010 located at 5th and Cheyenne in KCK.

Line No.'s 281-282 Project 051.054.3522.011796 Install 250' 4" PE. Retire 220' 4" BS; 30' 4" CS. 3132 Puckett Rd, Kansas City, KS. This work is to resolve a class 1 leak by fully replacing a section of bare steel main.

Line No. 283 Project 051.054.3522.011798 Retire 30' 2" CS Main. 6535 Burnham Dr, Mission, KS. Install 30' 2" CS Main. This work is to permanently repair a class 3 leak on a leaking dresser coupling.

Line No. 284 Project 051.054.3522.011809 Retire 20' 4" CS & 10' 2" CS main. 74th St & Bond St, Shawnee, KS. Install 20' 4" CS & 10' 2" CS main. This work order is to install a dog leg to permanently repair a class 1 leak.

Line No. 285 Project 051.054.3522.011815 Retire 76' 2" CS and 5' 2" BS main. 53rd St & Walmer St, Mission, KS. Install 90' 2" CS main. Install main dog leg to permanently repair a class 3 leak.

Line No.'s 286-287 Project 051.053.3522.012556 Retire 700' 6" CS main. W 64th St & Monticello Rd, Shawnee, KS. Install 700' 6" CS main. The 6" CS main is exposed on the West side of Monticello within a creek bed. Relocate the section of pipe deeper so that it is not exposed.

Line No.'s 288-289 Project 051.054.3721.012918 Main Replacement - 609 N Rutland, Wichita - Retire 20' of 4" APCS due to service line tap located under a large tree. Install 20' of 4" PE main.

Line No.'s 290-294 Project 051.054.3721.013065 Cast Iron Main Replacement - 10th & Lewellen, Wichita - Retire 471' of 4" CI & 105' of 2" CI main due to obsolescence. Install 460' of 2" PE main.

Line No.'s 298-300 Project 051.054.3522.011814 Abandon 20' 6" CS main. 6217 Holliday Dr, Kansas City, KS. Install 20' 6" CS main. There's a grade 2 leak on the valve North of the intersection of S 63rd St & Holliday Dr. The valve isn't capable of being packed and will need to be replaced on a new dogleg.

Line No. 301 Project 051.054.3721.012942 Station Piping & Gasket Replacement - 17th & Charles, Wichita - Replace leaking gasket on inlet riser valve and leaking outlet station piping on DRS.

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

In the Matter of the Petition of Kansas Gas)
Service, a Division of ONE Gas, Inc. for)
Approval by the Commission to Change its Gas) DOCKET NO. 25-KGSG-____-TAR
System Reliability Surcharge Per K.S.A. 66-)
2201 through 66-2204.)

**DIRECT TESTIMONY
OF
ANDREW STEVEN COPELAND
ON BEHALF OF
KANSAS GAS SERVICE
A DIVISION OF ONE GAS, INC.**

APRIL 28, 2025

DIRECT TESTIMONY
OF
ANDREW STEVEN COPELAND
KANSAS GAS SERVICE
DOCKET NO. 25-KGSG-___-TAR

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Andrew Steven Copeland, and my business address is 15 East Fifth
3 Street, Tulsa, OK 74103.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by ONE Gas, Inc. ("ONE Gas") as the Director of Cybersecurity.

6 **Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND BUSINESS**
7 **EXPERIENCE.**

8 A. My educational background is focused on cybersecurity. I received a Bachelor of
9 Technology in Information Technologies from Oklahoma State University in 2016, with
10 an emphasis in Information Assurance and Forensics. Additionally, in 2019 I became
11 an ISC² Certified Information Systems Security Professional ("CISSP").

12 I have nine years of business experience as a cybersecurity professional. As the
13 Director of Cybersecurity at ONE Gas, I am responsible for overseeing cybersecurity
14 operations, incident response, cybersecurity architecture, and cybersecurity
15 regulations of our corporate and pipeline systems. Throughout my tenure at ONE Gas
16 I have always been a member of the security team, starting as a security analyst and
17 prior to this role, a manager. Preceding my employment at ONE Gas, I was a Network
18 Security Engineer for Peak UpTime, a managed services company providing IT and
19 cybersecurity configuration and support to small- and medium-sized businesses.

1 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

2 A. Yes. I provided written testimony in Docket 24-KGSG-215-TAR.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

4 A. The purpose of my testimony is to support the eligibility of cybersecurity investments
5 by Kansas Gas Service ("KGS" or "Company"), a division of ONE Gas, for inclusion in
6 the proposed Gas System Reliability Surcharge ("GSRS").

7 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

8 A. Yes. I am sponsoring Exhibit ASC-1.

9 **Q. CAN YOU PROVIDE SOME BACKGROUND INFORMATION REGARDING**
10 **INCLUDING CYBERSECURITY PROJECTS IN KGS'S GSRS?**

11 A. In 2018, the Kansas Legislature passed Senate Bill 279, which amended the Gas
12 Safety and Reliability Policy Act, K.S.A. 66-2201 through 66-2204. In addition to other
13 changes, Senate Bill 279 added "system security costs" as a type of infrastructure
14 investment eligible for recovery using a GSRS. Specifically, this category of "natural
15 gas utility plant projects" eligible for recovery through a GSRS was codified in K.S.A.
16 66-2202(f)(4). In addition, K.S.A. 66-2202(i) defines "system security" as:

17 capital expenditures to protect a utility's capital assets, including
18 both physical assets and cyber assets, such as networks,
19 computers, servers, operating systems, storage, programs and
20 data, from attack, damage or unauthorized use and access.

21 **Q. WHAT IS THE FOCUS OF YOUR TESTIMONY?**

22 A. My testimony focuses on the protection of cyber assets. Company witness, Mr. Jordan
23 Robl discusses the inclusion of system security as it relates to KGS's physical assets.

24 **Q. CAN YOU PLEASE EXPLAIN WHAT IS MEANT BY CYBERSECURITY**
25 **INVESTMENTS?**

1 A. Cybersecurity investments are capital expenditures that are used on software or
2 technology platforms that provide security control. These security controls have been
3 procured to reduce or eliminate a security gap or to reduce or augment cybersecurity
4 staffing requirements. As used in this testimony, all cybersecurity investments provide
5 security control for either the Supervisory Control and Data Acquisition ("SCADA") gas
6 control network, the Industrial Control System ("ICS") electronic systems, or underlying
7 system components used to support KGS's natural gas system.

8 **Q. ARE YOU SPONSORING ANY SPECIFIC JOB ORDERS?**

9 A. Yes. As indicated in Exhibit ASC-1, I sponsor Job Orders 010163 and 010433.

10 **Q. PLEASE DISCUSS JOB ORDER 010163.**

11 A. Job Order 010163 replaced IT infrastructure for the Company's two data centers which
12 was nearing vendor-defined end-of-life. Specifically, this work included procurement
13 and deployment of new routers and switches which facilitate network and internet
14 access. If the IT infrastructure had not been replaced prior to the end-of-life date set
15 by the vendor, the devices would no longer receive security updates and be prone to
16 hacking attempts by malicious entities.

17 **Q. PLEASE DISCUSS JOB ORDER 010433.**

18 A. Job order 010433 is part of the Company's licensing for the Microsoft Windows
19 platform that runs most of the technology in use by the Company including laptops,
20 servers, and cloud infrastructure. This licensing is required to receive monthly security
21 updates from the vendor, which on average fix approximately one-hundred (100)
22 security vulnerabilities each update.

23 **Q. WHY ARE JOB ORDERS 010163 AND 010433 NECESSARY TO PROTECT THE**
24 **COMPANY'S ASSETS?**

1 A. Both job orders support proper security updates and management of key IT
2 infrastructure that facilitates the IT systems supporting our safe and reliable natural
3 gas system. The Transportation Security Administration (“TSA”), Department of
4 Homeland Security, Federal Bureau of Investigation, and countless trade associations
5 have publicly advocated for timely security update testing and implementation to
6 combat ever-increasing cybersecurity threats. In fact, the TSA has security-based
7 regulatory requirements within the Security Directive Pipeline-2021-02 series that
8 obligates ONE Gas to “Reduce the risk of exploitation of unpatched systems through
9 the application of security patches and updates...”

10 **Q. ARE ALL COSTS RELATED TO THESE CYBERSECURITY PROJECTS BEING**
11 **INCLUDED FOR RECOVERY?**

12 A. No. K.S.A 66-2202(f)(4), allows for the recovery of corporate allocated system security
13 costs. Job Orders 010163 and 010433 are investments at the corporate level. KGS
14 has only included in this filing the amount of investment that was allocated to KGS.

15 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

16 A. Yes, it does at the current time.

VERIFICATION

STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

Andrew Steven Copeland, being duly sworn upon his oath, deposes and states that he is Director of Cybersecurity for ONE Gas, Inc.; that he has read and is familiar with the foregoing Direct Testimony filed herewith; and that the statements made therein are true to the best of his knowledge, information, and belief.



Andrew Steven Copeland

Subscribed and sworn to before me this 28 day of April 2025.



My appointment Expires:

October 25, 2025


NOTARY PUBLIC

Line No.	GSRS Qualification	Company	Unitization Date	Cost Center	Function	Job Order	Description	FERC Account Number	Cost
1	Cyber Security	101 ONE Gas, Inc.	1/28/2025	1502	100	010163	Replacement of IT network infrastructure for data centers	39180	\$51,531
2	Cyber Security	101 ONE Gas, Inc.	12/20/2024	1502	101	010433	Microsoft Upgrades and Licensing for 2024	39160	\$842,564
	Corporate Cybersecurity Subtotal								<i>\$894,095</i>
2025 Q1 KGS Distrigas Allocated Total									28.91% \$258,483

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

In the Matter of the Petition of Kansas Gas)
Service, a Division of ONE Gas, Inc. for)
Approval by the Commission to Change its) DOCKET NO. 25-KGSG-____-TAR
Gas System Reliability Surcharge Per K.S.A.)
66-2201 through 66-2204.)

**DIRECT TESTIMONY
OF
AMY C. VAN NICE
ON BEHALF OF
KANSAS GAS SERVICE
A DIVISION OF ONE GAS, INC.**

APRIL 28, 2025

DIRECT TESTIMONY
OF
AMY C. VAN NICE
KANSAS GAS SERVICE
DOCKET NO. 25-KGSG-____-TAR

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Amy C. Van Nice. My business address is 7421 West 129th Street,
3 Overland Park, Kansas, 66213.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Kansas Gas Service, a division of ONE Gas, Inc., (“Kansas Gas
6 Service” or the “Company”) as a Rates Specialist in the Rates and Regulatory
7 Department.

8 **Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND BUSINESS**
9 **EXPERIENCE.**

10 A. I began my employment with Kansas Gas Service in 2010, as an Accountant in the
11 Financial Accounting Department. In 2024, I joined the Rates and Regulatory
12 Department as a Rates Specialist. I have a Bachelor of Science degree in Accounting
13 and a Master of Accounting from The University of Kansas. I am also a certified public
14 accountant.

15 **Q. WAS THIS TESTIMONY PREPARED BY YOU OR UNDER YOUR DIRECT**
16 **SUPERVISION?**

17 A. Yes, it was.

18 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

19 A. No.

20 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

1 A. The purpose of my testimony is to support the calculation of the Gas System Reliability
2 Surcharge ("GSRS") revenue requirement, the allocation of relevant costs to customer
3 classes, the development and design of GSRS rates, and the revised GSRS tariff rider.

4 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

5 A. Yes. I am sponsoring Exhibits ACV-1 through ACV-6.

6 **Q. PLEASE EXPLAIN THE APPLICABLE GSRS REVENUE RATE PARAMETERS**
7 **CONTAINED IN THE GSRS STATUTE.**

8 A. K.S.A. 66-2203 provides parameters for GSRS filings. Pursuant to this statute, the
9 Commission may not approve a GSRS filing if it would produce annualized revenues
10 below the lesser of \$1,000,000 or ½% of the most recent base revenue approved in
11 the utility's most recent general rate proceeding. The most recent general rate
12 proceeding for Kansas Gas Service was 24-KGSG-610-RTS ("610 Docket"). The
13 base revenue authorized for Kansas Gas Service in the 610 Docket was
14 \$387,204,693, resulting in a GSRS ½% threshold of \$1,936,023. Thus, the statutory
15 "floor" for Kansas Gas Service in a GSRS filing until Kansas Gas Service's next
16 general base rate proceeding is completed is \$1,000,000. Exhibit ACV-1 establishes
17 the Kansas Gas Service GSRS Revenue Requirement at \$7,207,932 thus meeting the
18 minimum threshold.

19 Similarly, the maximum annualized GSRS revenues contemplated by the
20 statute are capped at 20% of the most recent base revenue approved in the utility's
21 most recent general rate proceeding. Based on the outcome of the 610 Docket, the
22 GSRS recovery "ceiling" for Kansas Gas Service is currently \$77,440,939. Again, the
23 requested GSRS revenue falls well within the parameters established in the statute.
24 Further, K.S.A. 66-2204 provides a "rate" ceiling of \$0.80 per month, per filing, by
25 which the residential GSRS rate may increase in any GSRS filing. Exhibit ACV-5 sets

1 forth the incremental residential GSRS charge of \$0.71 per month, which is below that
2 ceiling.

3 **Q. WERE ANY OF THE COSTS INCLUDED WITHIN THIS GSRS REQUEST ALSO**
4 **CONTAINED IN RATE BASE WITHIN THE 610 DOCKET?**

5 A. No.

6 **Q. PLEASE IDENTIFY THE ASPECTS OF THE GSRS CALCULATION.**

7 A. Kansas Gas Service's GSRS Petition contains the following elements:

8 1. The inclusion of system investment projects and government relocation
9 expenditures placed in service after May 1, 2024, and unitized during the
10 period May 1, 2024, through February 28, 2025. Company witness Mr. Jordan
11 Robl will discuss these projects;

12 2. The inclusion of blanket work orders involving the replacement of service lines,
13 mains, and meters placed in service and unitized during the period between
14 May 1, 2024, and February 28, 2025. Company witness Mr. Jordan Robl will
15 discuss these projects; and

16 3. The inclusion of cyber security projects that were placed in service after May
17 1, 2024, and unitized between May 1, 2024, and February 28, 2025. Company
18 witness Mr. Andrew Copeland will discuss these projects.

19 **Q. COULD YOU PLEASE EXPAND ON THE CUTOFF DATE USED TO DETERMINE**
20 **GSRS ELIGIBLE PROJECTS?**

21 A. Projects included in this filing were those that were both in service and unitized prior
22 to closing the Company's plant accounting records for February 2025. "Unitization,"
23 as used in this filing, refers to the accounting process by which project costs are
24 accumulated, and amounts are assigned to FERC accounts. Due to the accounting
25 tasks necessary to finalize a project, the unitization date occurs after a project is in
26 service.

1 **Q. PLEASE PROVIDE AN EXPLANATION OF EXHIBIT ACV-1.**

2 A. Exhibit AVC-1 summarizes the components of the GSRS Revenue Requirement
3 calculation. The calculation methods and components align with those required in
4 K.S.A. 66-2204 sections (d)(1) through (9). As shown on Line 9, the total GSRS
5 Revenue Requirement is \$7,207,932. The revenue requirement identified in Exhibit
6 ACV-1 incorporates all the aspects of the GSRS calculation as discussed above.

7 **Q. HOW DID YOU DETERMINE THE CARRYING CHARGE FOR CALCULATING THE**
8 **GSRS REVENUE REQUIREMENT?**

9 A. The Stipulated Settlement Agreement approved by the Commission in the 610 Docket
10 sets forth the provisions for the carrying charge to be applied to recoverable
11 investments for Kansas Gas Service's GSRS filing. This rate of 8.9700% was used in
12 the calculation of the revenue requirement in the current filing, as shown on Exhibit
13 ACV-1.

14 **Q. PLEASE EXPLAIN EXHIBIT ACV-2.**

15 A. Exhibit ACV-2 identifies the GSRS Gross and Net Plant in Service by FERC account
16 for GSRS eligible expenditures, further classified by category of GSRS expenditure.
17 GSRS eligible projects are identified in K.S.A. 66-2202 sections (f)(1) through (5), as
18 amended, and are discussed in greater detail in the testimonies of Company witness
19 Mr. Robl and Company witness Mr. Copeland. Column (B) identifies the proposed
20 GSRS expenditures that relate to allocated cyber security projects, Column (C)
21 identifies the proposed safety and governmental relocation projects, and Column (D)
22 identifies the proposed blanket GSRS expenditures. Accumulated Depreciation of
23 \$1,152,417 associated with this filing is shown in column (E) and Column (F) identifies
24 the Net GSRS plant by FERC account of \$60,688,949.

25 **Q. CAN YOU PLEASE DESCRIBE WHAT YOU MEAN BY "ALLOCATED CYBER**
26 **SECURITY PROJECTS"?**

1 A. K.S.A. 66-2202 section (f)(4), as amended, allows for the inclusion of System Security¹
2 costs including allocated corporate costs. Kansas Gas Service includes security
3 investments that are described in Mr. Copeland's testimony within the GSRS filing that
4 were incurred at the corporate level. The plant in service included in Column (B) on
5 exhibit ACV-2 reflects Kansas Gas Service's portion of the total investment.

6 **Q. PLEASE SUMMARIZE EXHIBIT AVC-3.**

7 A. Exhibit ACV-3 identifies the Accumulated Depreciation of \$1,152,417 identified by
8 FERC Account and Accumulated Deferred Income Taxes of \$4,266,142 associated
9 with Kansas Gas Service's GSRS capital expenditures. The Accumulated Deferred
10 Income Tax ("ADIT") balance represents the liability associated with GSRS investment
11 that is used to reduce GSRS Rate Base.

12 **Q. PLEASE EXPLAIN EXHIBIT ACV-4.**

13 A. Exhibit ACV-4 sets forth the calculation of annualized Depreciation Expense
14 associated with GSRS plant, split between allocated cyber security, safety and
15 government relocation projects, and blanket work orders. As shown on line 42 of the
16 Exhibit, the annualized Depreciation Expense is \$2,146,806.

17 **Q. PLEASE EXPLAIN EXHIBIT ACV-5.**

18 A. Exhibit ACV-5 allocates the GSRS revenue requirement to Kansas Gas Service's
19 customer classes as provided for in the agreed upon Stipulation in the 610 Docket as
20 required in the statute. Specifically, the GSRS Revenue Requirement is allocated to
21 each class based upon the proportion of its Pro-Forma revenue to total Pro-Forma
22 revenue as defined in Appendix B, of the Stipulation and Agreement approved in the
23 610 Docket, adjusted for the discount customer revenue by revenue class. The

¹ As per K.S.A. 66-2202(i), "system security" shall mean capital expenditures to protect a utility's capital assets, including both physical assets and cyber assets, such as networks, computers, servers, operating systems, storage, programs and data, from attack, damage or unauthorized use and access.

1 revenue requirement by class is then divided by the number of billing determinants for
2 each class as defined in that same Appendix, to establish the monthly rates. The total
3 revenue requirement of \$7,207,932 is shown on line 22 and the monthly fixed rate and
4 Column G in schedule ACV-5 calculates the monthly fixed rates by customer class
5 below:

GSRS Proposed Rates	
Customer Class	Monthly Fixed Rate
RS – Residential Sales	\$0.71
GSS – General Sales Small	\$1.14
GSL – General Sales Large	\$2.71
GSTE – General Sales Transport Eligible	\$14.02
SGS – Small Generator Sales	\$1.15
GIS – Gas Irrigation Sales	\$2.30
STk -- Small Transportation Service “k” system	\$5.96
STt – Small Transportation Service “t” system	\$7.01
GITt – Gas Irrigation Transportation Service “t” system	\$6.32
LVTk – Large Volume Transportation Service “k” system Tier 1	\$14.17
LVTk – Large Volume Transportation Service “k” system Tier 2	\$31.18
LVTk – Large Volume Transportation Service “k” system Tier 3	\$55.34
LVTk – Large Volume Transportation Service “k” system Tier 4	\$224.05
LVTt –Large Volume T Transportation Service “t” system Tier 1	\$22.43
LVTt –Large Volume T Transportation Service “t” system Tier 2	\$49.53
LVTt –Large Volume T Transportation Service “t” system Tier 3	\$77.23
LVTt –Large Volume T Transportation Service “t” system Tier 4	\$846.22

WT - Wholesale Transportation Service	\$78.93
SSR – Sales Service for Resale	\$110.39
CNGk – Compressed Natural Gas Transportation Service	\$52.32
CNGt – Compressed Natural Gas Transportation Service	\$73.76

1 **Q. WHAT IS THE PURPOSE OF EXHIBIT ACV-6?**

2 A. Exhibit ACV-6 is the GSRS tariff page, revised to reflect the recalculated rates.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 A. Yes.

VERIFICATION


STATE OF KANSAS)
) ss.
COUNTY OF JOHNSON)

Amy C. Van Nice, being duly sworn upon her oath, deposes and states that she is Rates Specialist, Rates and Regulatory Department for Kansas Gas Service, a Division of ONE Gas, Inc.; that she has read and is familiar with the foregoing Direct Testimony filed herewith; and that the statements made therein are true to the best of her knowledge, information, and belief.



Amy C. Van Nice

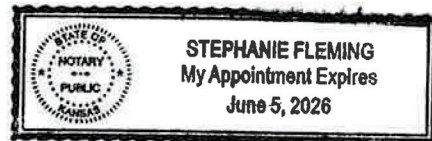
Subscribed and sworn to before me this 22nd day of April 2025.



NOTARY PUBLIC

My appointment Expires:

6/5/26



**Kansas Gas Service
A Division of ONE Gas**

Gas System Replacement Surcharge

Exhibit ACV-1

(A)		(B)	(C)	(D)	(E)	(F)
Line No.	Summary	Corporate Allocated Cyber Security	GSRS Safety & Govt. Relocation Projects	GSRS Blanket Work Orders	Grand Total	Source
1	Original Cost	\$ 258,483	\$ 30,338,893	\$ 31,243,989	\$ 61,841,366	Schedule ACV-2
2	<i>Less: Accumulated Depreciation</i>	<u>\$ (6,084)</u>	<u>\$ (497,143)</u>	<u>\$ (649,189)</u>	<u>\$ (1,152,417)</u>	Schedule ACV-3
3	Net Plant in Service	\$ 252,399	\$ 29,841,750	\$ 30,594,800	\$ 60,688,949	
4	<i>Less: Accumulated Deferred Income Taxes</i>	<u>\$ (4,836)</u>	<u>\$ (1,876,678)</u>	<u>\$ (2,384,628)</u>	<u>\$ (4,266,142)</u>	Schedule ACV-3
5	Net GSRS Rate Base	\$ 247,563	\$ 27,965,072	\$ 28,210,172	\$ 56,422,807	
6	Carrying Charge ⁽¹⁾	<u>8.9700%</u>	<u>8.9700%</u>	<u>8.9700%</u>	<u>8.9700%</u>	
7	Pre-Tax Required Return	\$ 22,206	\$ 2,508,467	\$ 2,530,452	\$ 5,061,126	Line 5 * Line 6
8	Depreciation Expense	\$ 21,711	\$ 891,389	\$ 1,233,705	\$ 2,146,806	Schedule ACV-4
9	GSRS Revenue Requirement (Annual)				<u><u>\$ 7,207,932</u></u>	Line 7 + 8

(1) Carrying Charge of 8.97% gross of tax was established in Docket 24-KGSG-610-RTS.

**Kansas Gas Service
A Division of ONE Gas**

Gas System Reliability Surcharge

Exhibit ACV-2

Plant in Service

(A)			(B)	(C)	(D)	(E)	(F)
Line No.	Account	Account Title	GSRS Projects Corporate Allocated Cyber Security	GSRS Projects Safety and Govt. Relocation	GSRS Blanket Work Orders	Less: Accumulated Depreciation	Net Plant
1	365.2	Rights of Way		1,200		8	1,192
2	366.2	Meas. and Reg. Station Structures		45,080		547	44,532
3	367	Mains		3,834,964		53,381	3,781,583
4	368	Compressor Station Equipment		74,411		1,639	72,772
5	369	Meas. And Reg. Station Equipment		182,146		2,780	179,366
6	376	Mains - Plastic		8,699,144		131,621	8,567,523
7	376.5	Mains - Metallic		11,174,747		166,119	11,008,628
8	376.9	Mains - Cathodic Protection		75,128	1,175,054	45,616	1,204,566
9	378	Meas. and reg. sta. equip. - general		229,280		1,644	227,636
10	379	Meas. and reg. sta. equip. - city gate		183,280		1,872	181,409
11	380	Services - Plastic		3,762,016	9,917,675	318,568	13,361,123
12	380.5	Services - Metallic		26,213		(44,914)	71,127
13	381	Meters		5,385	11,453,246	59,470	11,399,161
14	381.5	AMR Communication Devices			8,698,015	356,627	8,341,387
15	382	Meter installations		97,698		1,999	95,700
16	383	House Regulators		77,396		940	76,456
17	390.1	Structures and Improvements		16,898		73	16,825
18	391.6	Purchased Software	243,585			5,463	238,122
19	391.8	Computer Equipment	14,898			621	14,277
20	397	Communication Equipment		1,853,907		48,343	1,805,564
21	Total		\$ 258,483	\$ 30,338,893	\$ 31,243,989	\$ 1,152,417	\$ 60,688,949

Kansas Gas Service
A Division of ONE Gas

Gas System Reliability Surcharge

Exhibit ACV-3

Accumulated Depreciation and Accumulated Deferred Income Tax Liability

Accumulated Depreciation

(A)			(B)	(C)	(D)	(E)
Line No.	Account Number	Account	GSRS Projects Corporate Allocated Cyber Security	GSRS Projects Safety and Govt. Relocation	GSRS Blanket Work Orders	Total Accumulated Depreciation
1	365.2	Rights of Way		8		\$ 8
2	366.2	Meas. and Reg. Station Structures		547		\$ 547
3	367	Mains		53,381		\$ 53,381
4	368	Compressor Station Equipment		1,639		\$ 1,639
5	369	Meas. And Reg. Station Equipment		2,780		\$ 2,780
6	376	Mains - Plastic		131,621		\$ 131,621
7	376.5	Mains - Metallic		166,119		\$ 166,119
8	376.9	Mains - Cathodic Protection		2,874	42,742	\$ 45,616
9	378	Meas. and reg. sta. equip. - general		1,644		\$ 1,644
10	379	Meas. and reg. sta. equip. - city gate		1,872		\$ 1,872
11	380	Services - Plastic		82,739	235,829	\$ 318,568
12	380.5	Services - Metallic		467	(45,381)	\$ (44,914)
13	381	Meters		97	59,373	\$ 59,470
14	381.5	AMR Communication Devices			356,627	\$ 356,627
15	382	Meter installations		1,999		\$ 1,999
16	383	House Regulators		940		\$ 940
17	390.1	Structures and Improvements		73		\$ 73
18	391.6	Purchased Software	5,463			\$ 5,463
19	391.8	Computer Equipment	621			\$ 621
20	397	Communication Equipment		48,343		\$ 48,343
21	Total		\$ 6,084	\$ 497,143	\$ 649,189	\$ 1,152,417

Accumulated Deferred Income Tax Liability

(A)			(B)	(C)	(D)	(E)
Line No.			GSRS Projects Corporate Allocated Cyber Security	GSRS Projects Safety and Govt. Relocation	GSRS Blanket Work Orders	Total ADIT
1	Total		\$ (4,836)	\$ (1,876,678)	\$ (2,384,628)	\$ (4,266,142)

Kansas Gas Service
A Division of ONE Gas

Gas System Reliability Surcharge

Exhibit ACV-4

Depreciation Expense

GSRS Projects Corporate Allocated Cyber Security						
Line No.	Account Number	(A) Account	(B) GSRS Gross Additions	(C) Less: GSRS Retirements	(D) Net Depreciable GSRS Plant	(E) Depreciation Rate
						(F) Annualized Depreciation
1	391.6	Purchased Software	243,585	-	243,585	7.69%
2	391.8	Computer Equipment	14,898	-	14,898	20.00%
3		Total	258,483	-	258,483	
						21,711

GSRS Projects Safety and Govt. Relocation						
Line No.	Account Number	(A) Account	(B) GSRS Gross Additions	(C) Less: GSRS Retirements	(D) Net Depreciable GSRS Plant	(E) Depreciation Rate
						(F) Annualized Depreciation
4	365.2	Rights of Way	1,200	-	1,200	1.35%
5	366.2	Meas. and Reg. Station Structures	45,080	-	45,080	1.82%
6	367	Mains	3,834,964	(87,527)	3,747,437	2.15%
7	368	Compressor Station Equipment	74,411	(14,100)	60,312	3.30%
8	369	Meas. And Reg. Station Equipment	182,146	-	182,146	2.80%
9	374.2	Rights of Way	-	-	-	1.48%
10	376	Mains - Plastic	8,699,144	(80,430)	8,618,714	2.49%
11	376.5	Mains - Metallic	11,174,747	(227,877)	10,946,870	2.83%
12	376.9	Mains - Cathodic Protection	75,128	-	75,128	6.67%
13	378	Meas. and reg. sta. equip. - general	229,280	(85,384)	143,897	2.28%
14	379	Meas. and reg. sta. equip. - city gate	183,280	(2,139)	181,141	2.47%
15	380	Services - Plastic	3,762,016	(275,143)	3,486,873	3.91%
16	380.5	Services - Metallic	26,213	(14,545)	11,668	7.13%
17	381	Meters	5,385	-	5,385	2.91%
18	381.5	AMR Communication Devices	-	-	-	6.67%
19	382	Meter installations	97,698	(2,642)	95,056	3.15%
20	383	House Regulators	77,396	(640)	76,756	1.95%
21	390.1	Structures and Improvements	16,898	-	16,898	1.49%
22	397	Communication Equipment	1,853,907	-	1,853,907	6.67%
23		Total	30,338,893	(790,427)	29,548,466	
						891,389

GSRS Blanket Work Orders						
Line No.	Account Number	(A) Account	(B) GSRS Gross Additions	(C) Less: GSRS Retirements	(D) Net Depreciable GSRS Plant	(E) Depreciation Rate
						(F) Annualized Depreciation
24	367	Mains	-	-	-	2.15%
25	368	Compressor Station Equipment	-	-	-	3.30%
26	369	Meas. And Reg. Station Equipment	-	-	-	2.80%
27	374.2	Rights of Way	-	-	-	1.48%
28	376	Mains - Plastic	-	-	-	2.49%
29	376.5	Mains - Metallic	-	-	-	2.83%
30	376.9	Mains - Cathodic Protection	1,175,054	-	1,175,054	6.67%
31	378	Meas. and reg. sta. equip. - general	-	-	-	2.28%
32	379	Meas. and reg. sta. equip. - city gate	-	-	-	2.47%
33	380	Services - Plastic	9,917,675	-	9,917,675	3.91%
34	380.5	Services - Metallic	-	(1,011,119)	(1,011,119)	7.13%
35	381	Meters	11,453,246	(2,536,289)	8,916,957	2.91%
36	381.5	AMR Communication Devices	8,698,015	-	8,698,015	6.67%
37	382	Meter installations	-	-	-	3.15%
38	383	House Regulators	-	-	-	1.95%
39	390.1	Structures and Improvements	-	-	-	1.49%
40	397	Communication Equipment	-	-	-	6.67%
41		Total	31,243,989	(3,547,408)	27,696,582	
						1,233,705

42 **Total Depreciation Expense** **2,146,806**

Kansas Gas Service
A Division of ONE Gas

Gas System Reliability Surcharge
Development of GSRS Rate

Exhibit ACV-5

	(A)	(B)	(C)	(D)	(E)	(F)	(G)
Line No.	Customer Class	Pro-Forma Revenue - Docket No. 24-KGSG-610-RTS	% of Revenue Requirement Responsibility	GSRS Revenue Requirement (Based upon ratio of pro-forma revenue to total revenue)	Customers Per - 24-KGSG-610-RTS Settlement - Appendix B	GSRS Annual Charge	GSRS Monthly Charge
1	Residential Sales RS	\$ 230,503,866	69.715%	5,025,042	590,821	\$ 8.51	\$ 0.71
2	General Sales Svc. Small	23,157,049	7.004%	504,829	36,970	\$ 13.66	\$ 1.14
3	General Sales Svc. Large	17,782,088	5.378%	387,654	11,908	\$ 32.55	\$ 2.71
4	General Sales Svc. Transport Eligible	4,935,859	1.493%	107,603	639	\$ 168.28	\$ 14.02
5	Small Generator Sales SGS	473,189	0.143%	10,316	745	\$ 13.85	\$ 1.15
6	Gas Irrigation Sales GIS	225,134	0.068%	4,908	178	\$ 27.58	\$ 2.30
7	Small Transportation STk #	10,988,813	3.324%	239,559	3,349	\$ 71.54	\$ 5.96
8	Small Transportation STt	4,566,524	1.381%	99,551	1,184	\$ 84.07	\$ 7.01
9	Gas Irrigation Transportation GITt	1,754,591	0.531%	38,251	504	\$ 75.83	\$ 6.32
10	Large Volume Transportation LVTk Tier 1 #	1,282,594	0.388%	27,961	164	\$ 170.10	\$ 14.17
11	Large Volume Transportation LVTk Tier 2 #	1,864,496	0.564%	40,646	109	\$ 374.19	\$ 31.18
12	Large Volume Transportation LVTk Tier 3 #	2,100,462	0.635%	45,791	69	\$ 664.03	\$ 55.34
13	Large Volume Transportation LVTk Tier 4 #	10,350,130	3.130%	225,635	84	\$ 2,688.63	\$ 224.05
14	Large Volume Transportation LVTt Tier 1 #	281,095	0.085%	6,128	23	\$ 269.11	\$ 22.43
15	Large Volume Transportation LVTt Tier 2 #	622,525	0.188%	13,571	23	\$ 594.36	\$ 49.53
16	Large Volume Transportation LVTt Tier 3 #	1,163,811	0.352%	25,371	27	\$ 926.81	\$ 77.23
17	Large Volume Transportation LVTt Tier 4 #	16,128,380	4.878%	351,603	35	\$ 10,154.59	\$ 846.22
18	Wholesale Transportation WT t #	1,660,118	0.502%	36,191	38	\$ 947.20	\$ 78.93
19	Sales Service for Resale SSR	425,350	0.129%	9,273	7	\$ 1,324.68	\$ 110.39
20	CNG k system	288,000	0.087%	6,278	10	\$ 627.85	\$ 52.32
21	CNG t system	81,198	0.025%	1,770	2	\$ 885.07	\$ 73.76

22	Total	\$ 330,635,272	100%	\$ 7,207,932
----	--------------	-----------------------	-------------	---------------------

23 1) Note: Residential Class Limited to annual increase of \$.80/month over the most recent GSRS filing.

		Annual Increase	Cumulative Rate
24	2025 GSRS Rate - Residential	\$ 0.71	\$ 0.71
25	Total Residential Rate		\$ 0.71

26 # Includes flex revenue.

THE STATE CORPORATION COMMISSION OF KANSAS

Exhibit ACV-6
Index 44.1

Kansas Gas Service, a Division of ONE Gas, Inc.

SCHEDULE GSRS

All Rate Areas

Replacing Sheet 1 Filed ~~November 9, 2023~~ October 3, 2024

No supplement or separate understanding shall modify the tariff as shown herein.

Sheet 1 of 2

Gas System Reliability Surcharge Rider**Availability**

This rider is applicable to every bill for service provided under each of the Company's sales and transportation rate schedules except where not permitted under a separately negotiated contract with a customer. Not applicable to bills for As-Available Gas Sales Service or Interruptible Gas Transportation Service.

Net Monthly Charge

The Gas System Reliability Surcharge (GSRS) shall be a fixed monthly amount calculated as the applicable GSRS times the number of meters serving the customer's account, as indicated by the total number of Service Charges billed.

RS	Residential Sales Service	\$	<u>0.000.71</u>
GSS	General Sales Service Small	\$	<u>0.001.14</u>
GSL	General Sales Service Large	\$	<u>0.002.71</u>
GSTE	General Sales Service Transport Eligible	\$	<u>0.0014.02</u>
SGS	Small Generator Sales Service	\$	<u>0.001.15</u>
KGSSD	Kansas Gas Supply D	\$	—0.00
GIS	Gas Irrigation Sales Service	\$	<u>0.002.30</u>
SSR	Sales Service Resale	\$	<u>0.00110.39</u>
STk	Small Transportation Service (k)	\$	<u>0.005.96</u>
STt	Small Transportation Service (t)	\$	<u>0.007.01</u>
LVTk	Large Volume Transportation Service (k)		
Annual Use:	Below 10,000 Mcf	\$	<u>0.0014.17</u>
	10,001 Mcf – 20,000 Mcf	\$	<u>0.0031.18</u>
	20,001 Mcf – 40,000 Mcf	\$	<u>0.0055.34</u>
	Above 40,001 Mcf	\$	<u>0.00224.05</u>
LVTt	Large Volume Transportation Service (t)		
Annual Use:	Below 10,000 Mcf	\$	<u>0.0022.43</u>
	10,001 Mcf – 20,000 Mcf	\$	<u>0.0049.53</u>
	20,001 Mcf – 40,000 Mcf	\$	<u>0.0077.23</u>
	Above 40,001 Mcf	\$	<u>0.00846.22</u>
WTt	Wholesale Transportation Service (t)	\$	<u>0.0078.93</u>
GITt	Gas Irrigation Transportation Service (t)	\$	<u>0.006.32</u>
CNGk	Compressed Natural Gas General Transportation (k)	\$	<u>0.0052.32</u>
CNGt	Compressed Natural Gas General Transportation (t)	\$	<u>0.0073.76</u>

Issued: October 3, 2024Effective: November 1, 2024By: /S/ Janet L. BuchananJanet L. Buchanan, Director—Regulatory Affairs

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

Robert Vincent of lawful age, being first duly sworn upon oath, deposes and states: That he is an attorney for Kansas Gas Service, a division of ONE Gas, Inc.; that he has read the above and foregoing *Petition to Change GSRS Rate Schedules* and that the statements therein contained are true according to his knowledge, information and belief.


Robert Elliott Vincent

Subscribed and sworn before me this 28 day of April, 2025.


Notary Public

My Appointment Expires: 6/5/26



CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing *Petition to Change GSRS Rate Schedules* was forwarded this 28 day of April, 2025, addressed to:

Joseph Astrab
Consumer Counsel
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

Celeste Chaney-Tucker
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Carly Masenthin
Senior Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Patrick Hurley
Chief Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

/s/ Robert Elliott Vincent
Robert Elliott Vincent