

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

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

MOTION TO SUPPLEMENT THE EVIDENTIARY RECORD

Kansas Gas Service, a Division of ONE Gas, Inc., respectfully submits this motion to supplement the evidentiary record in the form of a response to Commissioner Emler's request that KGS provide an estimate as to when the Company expects to fully replace existing obsolete bare steel mains. In support of this motion, Kansas Gas Service states as follows:

1. Kansas Gas Service is a natural gas utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Commission. Its principal place of business in the state of Kansas is located at 7421 West 129th Street, Overland Park, Kansas 66213.

2. Kansas Gas Service has actively participated in this docket and has provided pre-filed testimony and has testified in cross-examination and to Commissioner directed questions in hearings held on March 30 and 31, 2016.

3. On March 3, 2017, Samuel Feather, Advisory Counsel for the Commissioners informed the Parties of Commissioner Emler's request that Kansas Gas Service respond to the following question:

"Based upon current investment levels for accelerated replacement of obsolete infrastructure, when does KGS estimate that it will have fully replaced its existing obsolete bare steel mains?"

4. In response, Kansas Gas Service respectfully requests to supplement the record with the Supplemental Testimony of Randal B. Spector, attached hereto as "Attachment A."

WHEREFORE, Kansas Gas Service, a division of ONE Gas, Inc., respectfully requests that the record be supplemented to provide response to Commissioner Emler's inquiry as presented by Advisory Counsel.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Judy Y. Jenkins", is written over a horizontal line.

Judy Y. Jenkins #23300

Kansas Gas Service

A Division of ONE Gas, Inc.

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(913) 319-8615

judy.jenkins@onegas.com

ATTORNEY FOR KANSAS GAS SERVICE

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

Judy Y. Jenkins, being duly sworn upon his oath, deposes states that he is counsel for ONE Gas, Inc., that he has read and is familiar with the foregoing **Motion**, and that the statements made therein are true to the best of his knowledge, information and belief.



Judy Y. Jenkins

Subscribed and sworn to before me this 16th day of March, 2017.



Notary Public

My Commissions expires: 09/28/2020



CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that this 17th day of March, 2017, a true and correct copy of the above and foregoing document was electronically sent to:

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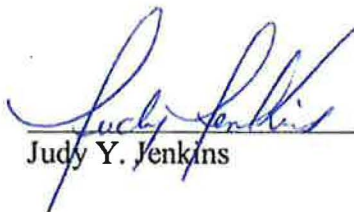
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Judy Y. Jenkins

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SUPPLEMENTAL TESTIMONY OF

RANDAL B. SPECTOR

**ON BEHALF OF
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.**

1 **Q. ARE YOU THE SAME RANDAL B. SPECTOR THAT PROVIDED DIRECT AND**
2 **REBUTTAL TESTIMONY ON BEHALF OF KANSAS GAS SERVICE IN THIS CASE?**

3 A. Yes, I am.

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

5 A. Per the request of Mr. Samuel Feather, the Commissioner's Advisory Counsel, I am providing
6 both clarification of testimony included in the record and additional information relating to the
7 Company's replacement of steel pipe. The actual question presented was "[b]ased upon current
8 investment levels for accelerated replacement of obsolete infrastructure, when does KGS estimate
9 that it will have fully replaced its existing obsolete bare steel mains?"

10 **Q. DOES KANSAS GAS SERVICE'S SYSTEM CONTAIN ANY STEEL PIPE?**

11 A. Yes. As of October 9, 2015, (the time of filing of my Direct Testimony in this record) KGS had
12 approximately 2096 miles of bare steel main. This estimate includes both cathodically-protected
13 and un-protected bare steel.

14 **Q. HAS KANSAS GAS SERVICE TAKEN STEPS TO ADDRESS THE RISKS**
15 **ASSOCIATED WITH BARE STEEL PIPE?**

16 A. Yes. The deterioration rate associated with cathodically-protected bare steel main has been
17 mitigated through the application of cathodic protection and is substantially lower than the
18 deterioration rate for unprotected. Over the last several decades, KGS has made a concerted
19 effort to add cathodic protection to the bare steel mains, and as a result KGS only has
20 approximately 250 miles of un-protected bare steel main currently.

21 **Q. HOW DOES KGS INCORPORATE THE REPLACEMENT OF STEEL PIPE IN THE**
22 **COMPANY'S PIPE REPLACEMENT PROGRAM?**

23 A. In addition to our current bare steel service line and cast iron replacement programs, KGS targets
24 other capital projects specifically by overall risk mitigation as required by PHMSA Part 192

1 Subpart P—Gas Distribution Pipeline Integrity Management (IM). As such, the risk factors for the
2 remaining 250 miles of un-protected bare steel main is compared to other projects that may result
3 in a higher overall risk mitigation, due to various consequence factors. Therefore, based on the
4 overall risk analysis approach for projects, there is no formal long term plan to specifically target
5 un-protected bare steel for replacement. Instead, the Company's Copperleaf C55 program
6 analyzes each potential replacement based on an overall risk comparison, as opposed to merely
7 pipe material. Having said that, based on the information available to us today, a ballpark
8 projection for replacing the majority of the 250 miles of un-protected bare steel main is
9 approximately 25 years.

10 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?**

11 **A.** Yes.

12

VERIFICATION

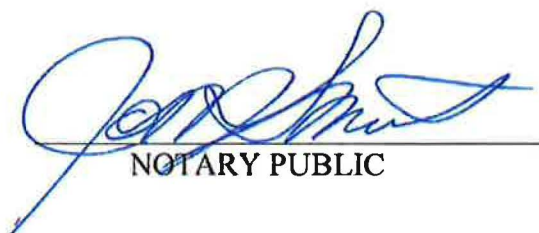
STATE OF KANSAS)
) ss.
COUNTY OF JOHNSON)

Randal B. Spector, being duly sworn upon her oath, deposes and states that he is an employee for One Gas, Inc.; that he has read and is familiar with the foregoing *Supplemental Testimony* filed herewith; and that the statements made therein are true to the best of his knowledge, information, and belief.



Randal B. Spector

Subscribed and sworn to before me this 16th day of March 2017.



NOTARY PUBLIC

My appointment Expires:

9/28/2020

