

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

In the Matter of the Complaint Against Kansas)
Gas Service Company and NPL by Virginia L.) Docket No. 16-KGSG-102-COM
Mendez.)

NOTICE OF FILING STAFF'S REPORT AND RECOMMENDATION

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) files its Report and Recommendation on the complaint against Kansas Gas Service Company, made by Virginia L. Mendez. Staff recommends the Commission dismiss this complaint and close the docket.

WHEREFORE Staff respectfully submits its Report and Recommendation to the Commission.

Respectfully submitted,



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For Commission Staff

**REPORT AND RECOMMENDATION
UTILITIES DIVISION**

TO: Chairman Jay Scott Emler
Commissioner Shari Feist Albrecht
Commissioner Pat Apple

FROM: Jon Bolinder, Pipeline Safety Inspector
Leo M. Haynos, Chief of Pipeline Safety

DATE: April 25, 2016

SUBJECT.: Docket No. 16-KGSG-102-COM: In the Matter of the Complaint Against
Kansas Gas Service Company and NPL by Virginia L. Mendez, 2229
S.W. Boswell Ct. Topeka, Kansas

EXECUTIVE SUMMARY:

Virginia L. Mendez (Complainant) filed a Complaint on August 24, 2015, alleging Kansas Gas Service Company (KGS) and its contractor Northern Pipeline Construction (NPL) replaced natural gas pipelines in Complainant's neighborhood in an unreasonable and unsafe manner. The Complainant requested that the gas lines in question be re-inspected for safety issues prior to the winter heating season. Staff has determined that KGS has conducted a satisfactory investigation of the integrity of its facilities in this area and the new pipelines were constructed in compliance with all pipeline safety regulations. Therefore, we recommend the Commission dismiss this Complaint.

BACKGROUND:

Description of Site and Location

In January of 2015, KGS initiated a pipeline replacement project in a residential neighborhood bordered by 21st & 24th streets and SW Plass & SW College Avenue in Topeka, Kansas. The project entailed replacing 10,431 feet of 4-inch cast iron main with polyethylene plastic (PE) piping. For the most part, the PE main was installed using directional drilling equipment. Where possible, the new PE service lines were installed by inserting the PE piping within the old steel service lines. This project began on January 21, 2015, and was completed by July 8, 2015, installing an actual 11,667 feet of PE main and replacing 182 services in the area. A map of the area showing a schematic of the gas distribution system is attached as Exhibit 1.

The Complainant's home is located on S.W. Boswell Ct. which is within the area of the 2015 cast iron replacement project; however, the piping on Boswell Ct. had been renewed in 1997 and was not part of this replacement project. Since 1997, the Boswell Ct. piping had been operating at a pressure of 0.75psi because it was connected to a low pressure cast iron system. After the cast iron was replaced, the operating pressure on the Boswell Ct. piping was increased to 45 psi in July of 2015. As part of the uprating process, KGS pressure tested the 1997 PE line to ensure it could operate at the higher pressures. The pressure test was performed on July 8, 2015, with no leaks found.

Investigation

On August 24, 2015, the Complainant alleged the manner in which KGS and NPL replaced gas lines in the vicinity of her home was unreasonable and unsafe due to poor workmanship.¹ Upon the filing of a formal complaint, Staff conducted an onsite investigation as well as a complete review of the construction records of the pipeline replacement project. Staff's investigation efforts included the following:

- Based on a telephone inquiry from the Complainant, Staff conducted a project site visit on August 3, 2015. At that time, all pipelines were buried and there was no noticeable indication of construction errors. During the visit, Staff observed areas of dead vegetation near 2301 SW Boswell and requested KGS check for a gas leak in this area. KGS performed a leak survey on August 4, 2015, of the areas of concern and no gas was detected.²
- Staff visited the KGS Topeka office on November 30, 2015, and conducted an audit of the construction records associated with the pipe replacement project in this area. In this audit, we reviewed records related to the type of pipe, burial depth, pressure tests, and the installers' qualifications to perform the installation tasks. All of KGS's records were in order and complete. Staff found no indication in the records or the daily work logs of KGS or NPL that indicated any problems had occurred during the replacement project. Audit records indicated the service line and main serving the Complainant's address were replaced and have been active since 1997. No new construction was done at the S.W. Boswell address as part of this replacement project.³
- Staff also audited KGS maintenance records to ensure the KGS Operations and Maintenance Plan (O&M) was followed in providing routine surveys of this neighborhood. Leak surveys were conducted periodically as required by the KGS O&M and pipeline safety regulations. Since February 2015, KGS also conducted 10 walking leak surveys and one mobile leak survey on Boswell Ct. or adjacent streets in this neighborhood. Exhibit 2 provides the date, location, and results of all leak surveys performed by KGS on Boswell Ct. since 1997. One underground leak was noted during the July 14, 2015,

¹ See Formal Complaint.

² Response to Staff Data Request 16-102 KCC-01, August 4 Assist Order.

³ Response to Staff Data request 16-102 KCC-01, KGS Service Line Information Sheet.

leak survey. This leak was determined to be a cap on a 1.25 inch purge point that was repaired on July 24, 2015, by tightening the cap. Staff concluded all leak surveys in this area were completed in a timely manner and were conducted in a manner consistent with state and federal pipeline safety regulations.

- Staff reviewed the leak investigation at the USD 501 Stout Elementary School that occurred on February 02, 2015, and is mentioned in the Complaint. Records indicated that KGS was notified at 07:35 and arrived at 08:01. Crews on scene found no readings with leak detection equipment inside or outside of the building. Crews also performed a shut in test of the building and found no inside leaks. KGS determined that the relief valve at the meter set was venting. This relief valve was disassembled and cleaned to repair the issue.⁴
- Staff reviewed KGS's equipment calibration records for gas detection which were all completed and in compliance with state and federal pipeline safety regulations.⁵
- Staff reviewed KGS's pressure test records for the new piping installed as part of the replacement project. All pressure tests records were complete and in compliance with state and federal pipeline safety regulations.⁶ Staff reviewed KGS's Operator Qualification records of the personnel that conducted the leak surveys and for the personnel involved with the pipe replacement projects. The documents reviewed indicate the KGS personnel performing the leak surveys were qualified in compliance with state and federal pipeline safety regulations.⁷

RECOMMENDATION:

After an investigation and review of KGS records related to pipe replacement, leak surveys, and maintenance in the Complainant's neighborhood, Staff has concluded KGS and NPL have performed all the required tests, inspections and surveys as required by State and Federal Pipeline Safety Regulations. The results indicate the pipelines of concern present no leakage or hazardous conditions. Therefore, Staff recommends that the Complaint be dismissed and the Docket be closed.

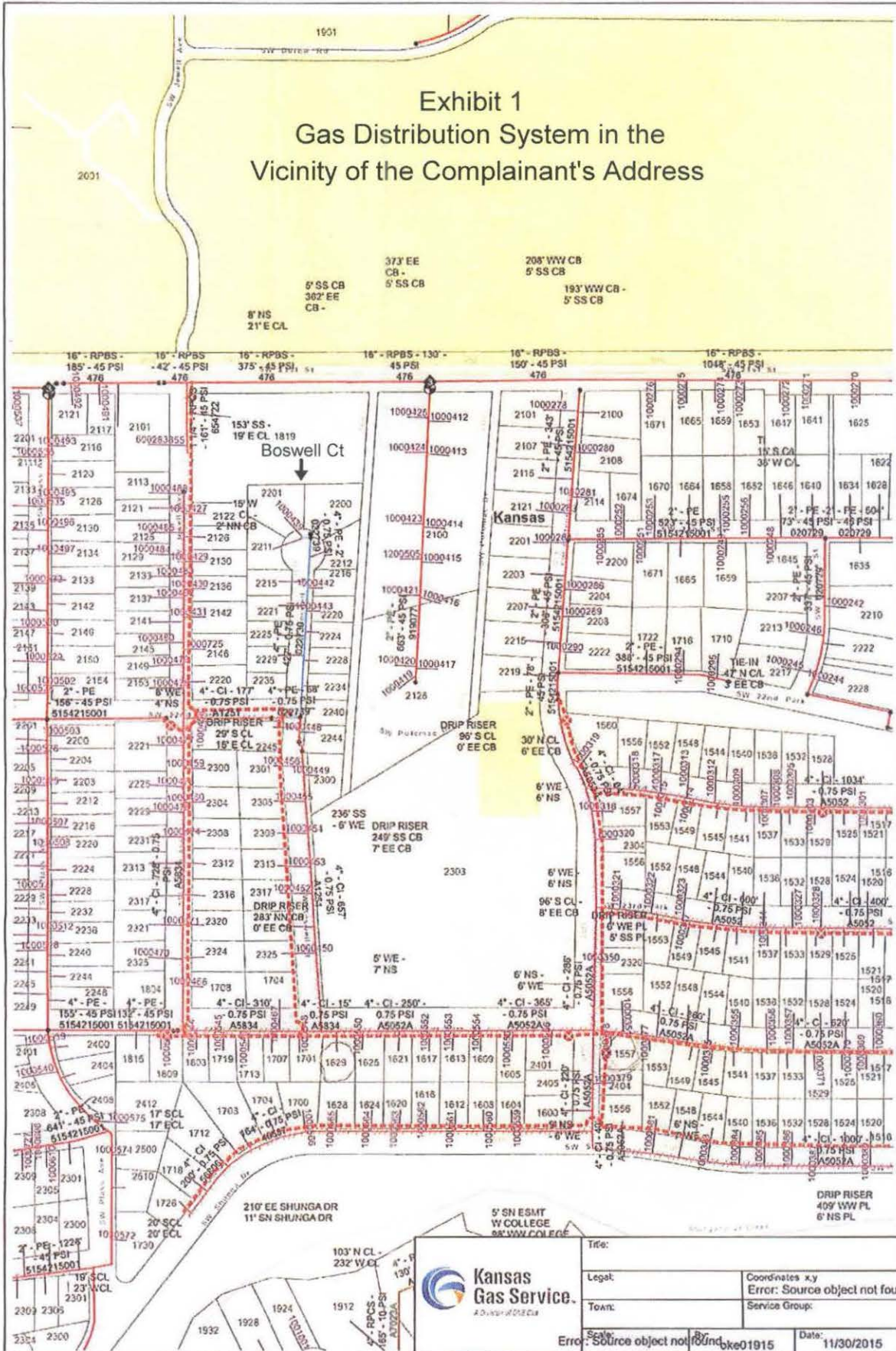
⁴ Response to Staff Data request 16-102 KCC-01, KGS Stout School Leak Report.

⁵ Response to Staff Data request 16-102 KCC-01, KGS Leak Detection Equipment Test and Inspection Records.

⁶ Response to Staff Data request 16-102 KCC-01, KGS Pressure Test Record.

⁷ Response to Staff Data request 16-102 KCC-01, KGS Operator Qualification Records.

Exhibit 1 Gas Distribution System in the Vicinity of the Complainant's Address



Title:	
Legat:	Coordinates x,y Error: Source object not found.
Team:	Service Group:
Scale:	Date: 11/30/2015

Error: Source object not found. 11/30/2015

EXHIBIT 2
KGS Leak Surveys Completed
in Complainant's Neighborhood

Survey Type	Date	Location	Results
Mobile leak survey block	8/7/2015	Boswell Ct	No leak found
Leak Survey Premises	8/7/2015	Boswell Ct	No leak found
Leak Survey Premises	8/5/2015	Boswell Ct	No leak found
Leak Survey Premises	8/4/2015	Boswell Ct	No leak found; witnessed by KCC staff.
Leak Survey Premises	8/3/2015	Boswell Ct	No leak found
Leak Survey Premises	8/1/2015	Boswell Ct	No leak found
Leak Survey Premises	7/31/2015	Boswell Ct	No leak found
Leak Survey Premises	7/14/2015	Boswell Ct	leak found on purge cap; repaired.
Leak Survey Premises	6/23/2015	Boswell Ct	No leak found
Walking survey of block	6/2/2015	Boswell Ct	No leak found
Odor Complaint at school.	2/2/2015	College Ave.	Pressure regulator on meter set leaking; repaired.
Leak Survey Premises	8/9/2013	Boswell Ct	No leak found
Walking survey of block	10/5/2012	Boswell Ct	No leak found
Walking survey of block	9/8/2011	Boswell Ct	No leak found
Walking survey of block	6/19/2007	Boswell Ct	No leak found
Walking survey of block	6/25/2004	Boswell Ct	No leak found
Walking survey of block	8/9/2001	Boswell Ct	No leak found
Walking survey of block	7/13/1998	Boswell Ct	No leak found
Walking survey of block	11/19/1997	Boswell Ct	No leak found

CERTIFICATE OF SERVICE

16-KGSG-102-COM

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing Staff's Report and Recommendation was placed in the United States mail, postage prepaid, or hand-delivered this 3rd day of May, 2016, to the following:

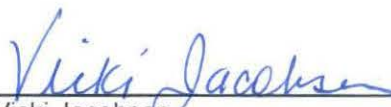
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