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June 25, 1992

Mr. C. Brent Stewart
Executive Secretary
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

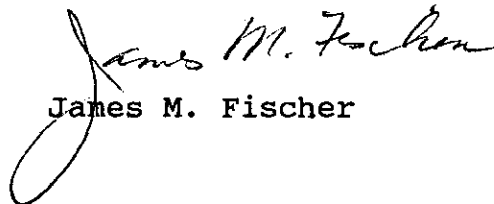
RE: Kansas Power and Light Company
Case No. GR-91-277

Dear Mr. Stewart:

Enclosed for filing in the above-referenced matter is the original and fourteen (14) copies of the Revised Program Filing of Gas Service, a Western Resources Company.

A copy of the foregoing document has been mailed to all parties of record this date.

Sincerely,


James M. Fischer

JMF/jr
Enclosures

cc: Office of the Public Counsel

FILED
JUN 25 1992
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the review and)
approval of cast iron main and)
unprotected steel main programs) Case No. GO-91-277
for The Kansas Power and Light)
Company)

Revised Program Filing of
Gas Service, a Western Resources Company

A. Introduction

On March 9, 1992, the Staff of the Missouri Public Service Commission (Staff) filed a memorandum with the Commission setting forth its recommendations regarding the Unprotected Steel Main and Cast Iron Main Programs previously submitted by Western Resources Inc. d/b/a Gas Service, a Western Resources Company (Gas Service or Company). Pursuant to Commission Order, the Company filed its Response to Staff's recommendations on May 11, 1992. On June 5, 1992, the Staff filed its Reply to Company's Response and Request for Expedited Treatment.

Following the submission of Staff's June 5, 1992, Reply, the Company requested a meeting with Staff to determine whether there was a basis (1) for resolving any differences remaining in this proceeding and (2) for reaching agreement on other safety-related matters currently pending before the Commission. That meeting was subsequently held on June 18, 1992. As discussed below, although no agreements were ultimately reached as a result of this meeting, the Company has revised its Cast Iron and Unprotected Steel Main Programs in response to several of the points raised by Staff in its June 5, 1992, Reply.

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B. Program Quantities (1995-2000)

(1) Cast Iron Main Program As shown on Revised Schedule 1, which is attached hereto and incorporated herein for all purposes, Gas Service has revised its estimated replacement quantities for cast iron mains for the years 1995 through 2000 to reflect the quantities proposed by Staff for the same period in the "4 inch and smaller - other" category. (See Attachment 1 to Staff's June 5, 1992, Reply). These revisions are being made in response to Staff's (1) concern that the estimated replacement amounts initially proposed by the Company may not be achievable and (2) its assertion that a "firm" replacement program must be adopted "with specific and realistic replacement levels in place." Staff Reply, at 5-6. The revisions proposed herein address these concerns by establishing a specific level of replacements for those smaller diameter mains that, because of their relative wall thickness, may be more susceptible to breakage caused by graphitization and thus present a greater potential safety hazard.¹

For the same reasons, the Company has excluded from the quantities proposed by Staff the unknown amounts reflected in Staff's "Break/Graph. ->4" category. Since the mileage quantities proposed by Staff for the Break/Graph category consist of nothing more than an unknown variable divided by an artificially

¹In its June 5, 1992 Reply, Staff pointed out that only 65 miles or (19%) of the approximately 350 miles of cast iron mains identified as high priority were characterized as firm replacement quantities under the Company's proposed program. Under the revisions proposed herein, approximately 272 miles or nearly 80% of the high priority mains would be scheduled for replacement by the year 2000.

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derived number of years, they are neither firm nor specific at this time. They should accordingly be excluded from the program under Staff's own criteria.

The Company has also excluded from its revised schedule for this period those quantities proposed by Staff in the six inch and larger main categories. In contrast to the four inch and smaller mains, experience has shown that the greater wall thickness of these larger diameter mains substantially reduces the incidence of breakage due to graphitization. Until additional information is accumulated regarding the need to replace such facilities, the Company does not believe it is reasonable or prudent to schedule firm quantities for replacement. The Company will, of course, continue to replace six inch and larger cast iron mains in accordance with existing practice and, beginning in 1994, in accordance with the Company's Facility Priority Index procedure.

As additional information becomes available, the Company recognizes that it may be necessary to adjust its Cast Iron Main Program. Indeed, the Company believes that a variety of information will become available over the next several years that will, in all likelihood, warrant other changes to the quantities proposed for 1995 through 2000. For example, the Company takes very seriously Stone & Webster's recommendation that main replacement criteria be developed that considers not only the physical location of facilities, but also their prior performance history. In contrast to the basis underlying Staff's proposed quantities, such a methodology evaluates the likelihood of failure

as well as the consequences of failure. As Gas Service has previously indicated, it is the Company's intent to fully integrate performance history into its program upon completion of the Facility Priority Index. Only when such a methodology is fully implemented, however, will it be possible to determine replacement quantities with some degree of finality.

The Company would accordingly propose that the Commission approve the quantities set forth in Schedule 1 for this period with the explicit understanding that these quantities will be subject to review and modification prior to 1995 upon the filing by the Company or Staff of new information pertaining to such quantities. The Company believes that such an approach reasonably balances Staff's desire to have firm and specific program quantities with the need to ensure that such quantities can be adjusted as new information becomes available.

(2) Unprotected Steel Main Program While Gas Service believes that no modification to its Unprotected Steel Main Program is necessary for the years 1995 through 2000, it recognizes that the Company's unprotected steel main program is ambitious and exceeds the strict requirements of the rule. As discussed in the Company's May 11, 1992, Response, however, Gas Service believes that these proposed quantities are not only reasonable and prudent but absolutely essential to the Company's efforts to achieve significant efficiencies and further enhance safety by coordinating the replacement and protection of unprotected steel main facilities with the replacement of service and yard lines. In recognition of

Staff's concerns, however, the Company will continue to review the appropriateness of these quantities and will not hesitate to propose modifications to them if warranted by additional information or changed circumstances.

C. Program Quantities (1992-1994)

Based on its review of Staff's Reply, Gas Service does not believe that any change is warranted to the replacement and cathodic protection quantities originally proposed by the Company for the years 1992 through 1994. Although Staff "questions" whether the 12.8 miles proposed by the Company for cast iron replacements in 1992 is adequate, it provides no explanation or analysis as to why this amount is, in fact, inadequate or why the 15 miles Staff has proposed for 1992 is more appropriate. The same is equally true for the quantities proposed by Staff for 1993 and 1994. Absent such an analysis, there is no basis for concluding that Gas Service should increase its cast iron main program quantities beyond the levels proposed by the Company -- levels which, in the first year alone, are already 267% above the average replacement levels previously experienced by the Company.

Nor is there any basis for modifying the unprotected steel main quantities proposed by the Company for this period. As previously noted, although the Company's unprotected steel main program exceeds the strict requirements of the rule, the quantities proposed by the Company are nevertheless reasonable and prudent based on sound economic considerations. In recognition of Staff's concerns, however, the Company will continue to review the

appropriateness of these quantities and will not hesitate to propose modifications to them if warranted by additional information and experience.

D. Conclusion

For the reasons set forth above, and those contained in its May 11, 1992, Response, Gas Service respectfully requests that the Commission approve the Company's Cast Iron and Unprotected Steel Main programs as revised in the attached Schedule 1.

Respectfully submitted,

GAS SERVICE,
A WESTERN RESOURCES COMPANY

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Michael C. Pendergast *By: JAL*
Assistant General Attorney,
Regulation
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Revised Program Filing of Gas Service, a Western Resources Company was deposited in the United States mail, first class postage prepaid, this 25th day of June, 1992, to all parties of record.

Michael C. Pendergast
Michael C. Pendergast
By: JAL

MISSOURI SAFETY DOCKET

Revised Schedule 1,

(CAST IRON AND BARE STEEL MAINS)

		1992	1993	1994	1995	1996	1997	1998	1999	2000
CAST IRON MAIN - MILES										
4 INCH AND SMALLER - P & P *	SEC 15-D-1-A,B,C	9.4	8.6	5.4	0.0	0.0	0.0	0.0	0.0	0.0
OVER 4 INCH - P & P *	SEC 15-D-1-A,B	0.0	0.0	3.7	**	**	**	**	**	**
4 INCH AND SMALLER - OTHER	SEC 15-D-1-C	2.1	12.4	18.0	32.0	36.0	36.0	36.0	36.0	36.0
PUBLIC WORKS PROJECTS	SEC 15-D-1-D,E,F	0.0	1.5	3.0	0.0	0.0	0.0	0.0	0.0	0.0
FPI	SEC 15-D-1-G	0.3	0.8	1.0	**	**	**	**	**	**
SYSTEM IMPROVEMENT		1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0
TOTAL CAST IRON MILES		12.8	24.3	32.1	32.0	36.0	36.0	36.0	36.0	36.0
BARE STEEL MAIN - MILES										
ALL SIZES - PROTECT - P & P *	SEC 15-E-1,2	2.2	11.8	16.1	0.0	0.0	0.0	0.0	0.0	0.0
ALL SIZES - REPLACE - P & P *	SEC 15-E-1,2	0.0	1.3	1.3	0.0	0.0	0.0	0.0	0.0	0.0
PROTECTION - WITH SLRP		102.0	100.0	100.0	90.0	75.0	44.5	0.0	0.0	0.0
PROTECTION - INDEPENDENT		22.0	15.0	15.0	15.0	16.0	24.0	0.0	0.0	0.0
PUBLIC WORKS PROJECTS	SEC 15-E-3,4	1.0	1.0	1.0	4.0	4.0	4.0	0.0	0.0	0.0
FPI	SEC 15-E-5	7.3	7.3	7.3	** 7.2	** 7.2	** 7.2	0.0	0.0	0.0
SYSTEM IMPROVEMENTS		1.0	1.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0
TOTAL BARE STEEL MILES		135.5	137.4	141.7	117.2	109.2	80.7	0.0	0.0	0.0
TOTAL MILES		148.3	161.7	173.8	149.2	139.2	116.7	36.0	36.0	36.0

* IN AREAS OF CONTINUOUS PAVEMENT AND NEAR CONCENTRATIONS OF THE GENERAL PUBLIC

** FPI REPLACEMENT MILES WILL VARY AS SEGMENTS OF MAIN ARE IDENTIFIED FOR REPLACEMENT

Prepared By Engineering Services June 19, 1992