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July 23, 1992

FILED

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MARY ANN YOUNG
General Counsel

Mr. Brent Stewart
Executive Secretary
Missouri Public Service Commission PUBLIC SERVICE COMMISSION
P. O. Box 360
Jefferson City, Missouri 65102

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

Dear Mr. Stewart:

Enclosed for filing in the above-captioned case is an original and fourteen (14) conformed copies of **Staff Response to the Revised Program Filing of Gas Service, A Western Resources Company.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

William M. Shansey
Assistant General Counsel
314-751-8702

WMS/jkn

Enclosures

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUL 23 1992

PUBLIC SERVICE COMMISSION

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 & Light)
Company.)

**STAFF RESPONSE TO THE REVISED PROGRAM FILING OF GAS SERVICE,
A WESTERN RESOURCES COMPANY**

Comes now the Staff of the Public Service Commission of the state of Missouri (the staff) and for its response to the Revised Program Filing of Gas Service, a Western Resources Company (Gas Service or Company), formerly The Kansas Power & Light Company (KPL), states as follows:

1. On March 10, 1992, the staff filed a detailed Memorandum containing staff recommendations regarding the cast iron and unprotected steel main programs of Gas Service, then KPL, in the above-styled cause.

2. On April 8, 1992, the Commission issued its order directing KPL to respond to the staff's Memorandum on or before May 8, 1992.

3. On May 11, 1992, KPL, now Gas Service, filed its response of Gas Service, a Western Resources Company (Response).

4. On June 5, 1992, the staff filed its Reply to Company's Response and a Request for Expedited Treatment.

5. The staff and Gas Service met on June 18, 1992 in an attempt to resolve differences and reach an agreement on Gas Service cast iron main and unprotected steel main programs.

12.

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6. Although, as Gas Service correctly contends, no agreements were reached as a result of this meeting, Gas Service has submitted a revised cast iron and unprotected steel main program filed June 25, 1992.

7. The staff does not desire to add yet another pleading to an already lengthy chain of pleadings, but the staff does wish to address and clarify at least one of the issues raised by the Company in its Revised Program Filing.

8. Company has stated on page 2 of its Revised Filing that staff's proposed quantity for cast iron main replacements in the "Break\Graph. -- 4 "category consists of "nothing more than an unknown variable divided by an artificially derived number of years, they are neither firm nor specific at this time". The staff responds that Commission Rule 4 CSR 240-40.030 (15)(D) requires the replacement program to "identify and eliminate pipelines . . . that present the greatest potential for hazard in an expedited manner". One of the high priority areas include, "sections of cast iron that exhibit a history of leakage or graphitization" [4 CSR 240-40.030 (15)(D) 1.G.]. Since the Company has not so far identified the quantity of cast iron main in this category (as is required), the staff has simply included the specific quantity that must be identified (indicated as "B" in the staff's schedule). The Company was given until 1995 to properly identify the specific quantity and the staff believes that replacement in five years is reasonable and would accomplish the required elimination in an "expedited manner". Therefore, the category identified by the staff is "specific" and

is unknown to the staff only because the Company must still make the required identification.

9. The Company has noted on page 3 of its Revised Program Response that "As additional information becomes available the Company recognizes that it may be necessary to adjust its Cast Iron Main Program". The staff maintains that when the Company establishes the exact amount in this high-priority category, and has made a determination that replacement in five years is not reasonable, then the Company should consider adjusting this amount through amendments to the plan.

10. It is the staff's belief that the Commission now has sufficient information before it to make a determination as to the approval of the Company's program. The staff again requests expedited treatment for this matter as was requested in its June 5, 1992 filing.

WHEREFORE, the staff of the Public Service Commission of the state of Missouri respectfully requests this Commission to issue its order approving the Unprotected Steel Main and Cast Iron Main Programs previously submitted by Western Resources, Inc. d/b/a Gas Service, a Western Resources Company, together with the changes

recommended by the staff to those programs in its previous filings in this docket.

Respectfully submitted,

William M. Shansey

William M. Shansey
Assistant General Counsel

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102
314-751-8702

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 23rd day of July, 1992.

William M. Shansey

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