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August 10, 2012

Cynthia Quarterman
Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Dear Ms. Quarterman:

This is in response to your letter dated July 23, 2012, requesting assistance in addressing pipeline safety by providing State information for a Congressional mandate concerning the Pipeline and Hazardous Materials Safety Administration's (PHMSA) nationwide survey on the progress of cast iron pipeline replacement.

I appreciate the opportunity to assist in your request for information addressing pipeline safety and the progress of cast iron pipeline replacement within the state and assure you that Kentucky and its pipeline safety program within the Public Service Commission (PSC) take pipeline safety very seriously. The PSC has, and continues to encourage operators in the state to replace cast iron pipe in their system and has approved Advanced Main Replacement Programs (AMRP) in an effort to accelerate the replacement of aging and high-risk pipe, including cast iron. Significant reductions in the number of cast iron mains have occurred over the last decade in Kentucky due, in part, to these main replacement programs.

At the beginning of 2000, there were five (5) operators in Kentucky with cast iron pipelines in their system with an approximate total of 406 miles of cast iron mains. Since that time, these operators have worked diligently to address the cast iron mains in their systems; by the end of 2011 nearly seventy-eight percent of these mains had been removed and/or replaced, leaving only ninety-two (92) miles of cast iron mains remaining throughout Kentucky. Of those five operators, two have completed the removal and/or replacement of all of its cast iron mains. Of the remaining three operators with cast iron pipelines in its system, two have an AMRP in place that includes a cast iron replacement component. The one operator without a formal AMRP has only three miles of cast iron mains left in its system. Operators generally base the replacement of the cast iron mains on integrity and risk assessment as well as the AMRP schedule and their Distribution Integrity Management Program (DIMP). The PSC will maintain its efforts in reviewing these programs and encourage operators to place a priority on the replacement of aging and high-risk pipe, including cast iron.

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Thank you for the opportunity to participate in the pipeline safety program and addressing these important pipeline safety issues. I look forward to our continued partnership with PHMSA and trust that the information provided above will assist in your nationwide survey on the progress of cast iron pipeline replacement.

Sincerely yours,

A handwritten signature in black ink, appearing to read "L. K. Peters", written in a cursive style.

Leonard K. Peters
Secretary

cc: Jeff DeRouen, Executive Director
Public Service Commission