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Pursuant to the Wyoming Administrative Procedure Act and the Wyoming Public Service Commission's (Commission) Procedural Rules and Special Regulations, notice is hereby given of the Application of Wyoming Gas Company, a division of Natural Gas Processing Co., (WGC or the Company), for approval of its Infrastructure Integrity Management Rate Rider and Meter Relocation.

WGC is a public utility as defined in Wyo. Stat. § 37-1-101(a) (vi)(D), subject to the Commission's jurisdiction pursuant to Wyo. Stat. § 37-2-112.

In Docket No. 30009-60-GA-16 (Record No. 14566) (Sub 60), the Commission issued a *Memorandum Opinion, Findings and Order Approving Stipulation* (Sub 60 Order), directing, inter alia, the Company to file its meter relocation plan within 6 months of the general rate case hearing held on October 31, 2017. On June 15, 2018, WGC filed its Application in Docket No. 30009-66-GA-18 (Record No. 15030) (Sub 66) requesting Commission approval of its Meter Location Report and Relocation Plan (Plan). The Plan was filed in accordance with the Commission's *Sub's 60 Order*. Pursuant to Open Meeting action taken on November 15, 2018, the Commission issued its *Order* (Sub 66 Order) on December 28, 2018, denying WGC's Application because it did not comply with Commission Rule Chapter 3, Section 16. The Commission directed WGC to formulate a reasonable plan to relocate non-compliant meters to the point of utilization, including a time-frame to complete the Plan, and a ratemaking method by which to recover the costs associated with the relocations. The Commission further directed WGC to develop a risk ranking methodology through which a relocation priority could be identified and implemented over a reasonable time-frame, and file a copy of the Plan with the Commission within ninety (90) days of the issuance of the *Sub 66 Order*. WGC was granted a 90 day extension to June 15, 2018, to file Meter Relocation Plan by *Letter Order* issued March 27, 2019.

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On June 25, 2019, WGC filed its Application together with supporting testimony and exhibits in this current docketed matter in accordance with the Commission's *Sub 66 Order* and the March 27, 2019 *Letter Order*. When developing its Distribution Integrity Management Plan (DIMP), WGC considered the Commission's concern that meters be located at the property line as well as maintenance of yard lines to the customer's building when the Company developed its plan to implement meter relocation. To develop its Meter Relocation Plan, the Company first reviewed its meter location study data to identify non-compliant meters and what risks those meters posed such as whether a meter is located at the property line, is in a high traffic area or a rural area or is at risk for corrosion due to aging materials. WGC states the primary risk is a meter being hit or run over by vehicle traffic. WGC categorized each meter based on priority of risk factors.

WGC is first proposing to proceed with relocation of meters identified as a Priority 1, then those identified as Priority 2 and so on until completion or directed otherwise. WGC surveyed 7,389 meters. The Company identified 1,014 meters that comply with the new Meter Relocation Plan and are located at the customer's building but may be at risk for vehicle hits and may be barricaded. There are 6,375 remaining meters that are non-compliant with the Commission's new Meter Relocation Rule. WGC states these meters are typically located at the property line next to a customer's building. WGC estimates there are 1,348 meters categorized as Priority 1, and 108 meters categorized as Priority 2.

WGC estimates that with the use of outside contractors, it may be able to accomplish about 530 meter relocations per year. WGC estimates that completing meter relocation for Priority 1 and 2 meters should take about 3 years assuming expected progress during construction. The Company estimates completing all meter relocations will take about 12 years, assuming expected progress during construction.

WGC estimates the total cost of the Meter Relocation Plan

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will be approximately \$18.3 million. WGC proposes to recover these costs through an Infrastructure Management (IIM) Rate Rider. The IIM would go into effect after the first year of implementation of the Meter Relocation Plan, with annual true-ups thereafter. WGC states it projects the first year investments recoverable through the IIM Rider to be \$1.55 million, and the cost would be spread among rate classes consistent with the revenue requirement per rate class approved in WGC's last rate case in Sub 60. WGC estimates this would represent about a 2.9% increase over base revenues from Sub 60.

This is not a complete description of the Application. Interested persons may inspect the Application at WGC's offices located at 101 Division Street, Worland, Wyoming, or at the Commission's offices in Cheyenne, Wyoming during regular business hours.

Anyone desiring to file a public comment, statement, intervention petition, protest or request for a public hearing in this matter must so file with the Commission in writing on or before August 2, 2019. Any intervention request filed with the Commission shall set forth the grounds of the proposed intervention or request for hearing as well as the position and the interest of the petitioner in this proceeding.

If you wish to intervene in this matter or request a public hearing which you will attend and you require reasonable accommodation for a disability, call the Commission at (307) 777-7427 or write to the Commission, 2515 Warren Avenue, Suite 300, Cheyenne, Wyoming 82002. Communications-impaired persons may contact the Commission through Wyoming Relay at 711. Please mention Docket No. 30009-69-GM-19 (Record No. 15283) in your communications.

Dated: July 3, 2019.

July 11-18, 2019