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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 Meter Location Report and Relocation Plan.

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.

On March 20, 2018, the Commission, in Docket No. 30009-60-GR-16 (Record No. 14566) (Sub 60), 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. The deadline for filing the meter relocation plan was April 30, 2018. On May 9, 2018, WGC filed its *Motion for Extension of Time in Which to File Meter Relocation Plan* stating that due to commitments outside the Company's control, it had not been able to complete its meter relocation plan and requested an extension to June 15, 2018, to file its meter relocation plan. On May 23, 2018, the Commission issued its *Order Granting Motion for Extension of Time in Which to File Meter Relocation Plan*, granting WGC an extension of time until June 15, 2018 to file its Meter Relocation Plan in a new docket.

On June 15, 2018, WGC filed its Application 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*. WGC states that it conducted a survey of the location of every meter using GPS equipment and recording the GPS coordinates, the address, account number, the type of company riser, and if possible, the type of customer riser. The Application included a report of the compilation of the data recorded concerning meter set locations either at the property line or at the building, service line types for the Company, and a plan to relocate any meters not in compliance with Commission Rule Chapter 3, Section 16(f), which provides:

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- (f) Gas utilities shall:
- (i) Locate all meters and service regulators in accordance with 49 CFR §192;
- (ii) Provide for the shortest safe distance to the customer's building entrance or point of utilization equipment;
- (iii) Submit a plan to the Commission, upon request, to address existing residential service meters not in compliance with this section.

WGC states that the primary concern when determining the most appropriate location for a gas meter set is safety while accessibility is the second consideration. In the past, meters were located at the property line which is the industry standard, or at the building or somewhere in between as dictated by the use of natural gas and the layout of the lot. Meters located at the property line are more susceptible to vehicular damage although utilities generally try to select a location along a fence line, away from a driveway, near other utility facilities, or in a more protected location. The WGC system was developed with the meters located at the property line. WGC states there are 6,375 meter located at the property line. Of the 6,375 customer service lines, 4,080 are plastic and 2,295 are steel. WGC states the service line type is important to understand when considering safety, maintenance and the cost of potential replacement or relocation of the meter.

WGC states the cost to relocate a meter to the gas piping entrance or point of utilization equipment varies by a number of factors involving the Company and customer service line including current pipe type, current pipe installation records, current pipe location and depth, personnel availability, right of way conditions and repair, and other underground facilities. Costs to relocate were estimated in 2018 dollars using both Company and contract personnel. WGC states the estimated complete service line replacement costs an average of \$1,907.00 per service or a total of \$7,373,226.00. The average cost to replace just the customer service line

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is \$1,519.00 per service or a total of \$2,900,547.00 for a total projected cost to relocate meters of \$10,273,773.00.

WGC states that in addition to the costs to the Company, if implemented, each customer must incur a cost to connect their gas pipe to the new meter location. WGC states the estimated best scenario cost to the customer would be approximately \$250.00 or a total cost of \$1,593,000 to customers. The Company states the cost to relocate the meters could exceed the current net plant for the entire utility. WGC states it does not consider a "large-scale meter relocation plan" to be beneficial to its customer base, but has modified its tariff to conform to the Commission Rules and will locate any new or relocated services and associated meters in association with its new tariff.

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 July 20, 2018. 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. 30009-66-GA-18 (Record No. 15030) in your communications.

June 26, July 3, 2018