**BEFORE**

**THE OHIO POWER SITING BOARD**

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| --- | --- | --- | --- | --- |
| In the Matter of the Ford Street HP Pipe Replacement Project |  | )  )  )  ) |  | Case No. 12-0471-GA-BNR |

**MOTION BY COLUMBIA GAS OF OHIO, INC. FOR WAIVER**

**AND REQUEST FOR EXPEDITED TREATMENT**

Now comes Columbia Gas of Ohio, Inc. (“Columbia Gas”), pursuant to Ohio Administrative Code § 4906-1-03 and files this motion requesting a waiver of the 21-day requirement found in Ohio Administrative Code 4906-5-02(B)(1). The reasons for this request are described more fully in the attached memorandum in support.

Respectfully submitted,

**COLUMBIA GAS OF OHIO, INC.**

By: /s/ Brooke E. Leslie

Brooke E. Leslie

Stephen B. Seiple, Asst. General Counsel

Brooke E. Leslie, Counsel

200 Civic Center Drive

Columbus, OH 43216-0117

Telephone: (614) 460-5558

Fax: (614) 460-6986

Email: bleslie@nisource.com

Attorneys for

**COLUMBIA GAS OF OHIO, INC.**

**MEMORANDUM IN SUPPORT**

On January 27, 2012, Columbia filed a Construction Notice for the Ford Street High Pressure Pipeline Replacement Project. Pursuant to the Notice, Columbia plans to install approximately 140 feet of 24” and 60 feet of 6” high pressure gas main in order to repair a Grade 1 leak on Ford Street in Maumee, Ohio.

OAC § 4906-5-02(B)(1) requires that a construction notice requesting expedited processing shall be filed no less than twenty-one days before the planned commencement of construction. Both §§ 4906-1-03 and 4906-5-02(B)(1) allow waiver of this requirement for good cause shown. Extraordinary circumstances exist in this situation to justify the request for the waiver.

As stated above, the purpose of the Ford Street Project is to replace a leaking section of 24” high pressure gas main. There is currently a Grade 1 leak at this location which requires Columbia to monitor the site 24 hours a day, 7 days a week until a permanent repair is made. Due to the threat of the leak getting worse, Columbia has determined that it is necessary to replace the pipe as quickly as possible. The pipe at issue is located at the outlet side of a very large gate station and essentially provides gas to one half of Columbia’s customers in the Toledo market. If the leak were to get worse, Columbia may have to shut the pipeline down, resulting in the loss of service for approximately 121,300 customers.

Given these extraordinary circumstances, Columbia respectfully requests that the notice requirements found in § 4906-5-02(B)(1) be waived to allow construction to begin on February 7, 2012.

Respectfully submitted,

**COLUMBIA GAS OF OHIO, INC.**

By: \_\_/s/ Brooke E. Leslie\_\_\_\_\_\_\_\_

Brooke E. Leslie

Stephen B. Seiple, Asst. General Counsel

Brooke E. Leslie, Counsel

200 Civic Center Drive

Columbus, OH 43216-0117

Telephone: (614) 460-5558

Fax: (614) 460-6986

Email: bleslie@nisource.com

Attorneys for

**COLUMBIA GAS OF OHIO, INC.**