### BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Defer Environmental Investigation and Remediation Costs.

Case No. 08-0606-GA-AAM

# ANNUAL DEFERRAL REPORT OF COLUMBIA GAS OF OHIO, INC.

On May 19, 2008, Columbia Gas of Ohio, Inc. ("Columbia") filed its Application in this docket, requesting authority to defer on its books environmental investigation and remediation costs. By Entry dated September 24, 2008, the Commission approved the Application. Paragraph 11 of said Entry provides:

> Prior to their deferral on its books, we require Columbia to make an annual filing in this docket detailing the costs incurred in the prior 12-month period covered by the deferrals and the total amount deferred to date.

Pursuant to Paragraph 11 of the September 24, 2008 Entry, Columbia provides the following information. The costs Columbia incurred for the period December 2017 through November 2018, and which Columbia proposes to defer, were \$1,555,073.00. These costs are comprised of expenses incurred in the continued remediation of sites in Toledo, Fremont, Athens, and Portsmouth, Ohio. Columbia's projects and costs are described in the following attachments:

- Attachment 1 Marion project description
- Attachment 2 Bellevue project description
- Attachment 3 Grandview Heights/Goodale project description
- Attachment 4 Toledo (Swan Creek) project description
- Attachment 5 Toledo cost detail
- Attachment 6 Fremont project description
- Attachment 7 Fremont cost detail

Attachment 8 — Fostoria project description

Attachment 9 - Athens project description

Attachment 10 – Athens cost detail

Attachment 11 – Portsmouth project description

- Attachment 12 Portsmouth cost detail
- Attachment 13 Lorain project description

Additionally, Columbia has included in this report, as Attachment 14, a schedule showing the amounts deferred by year for all projects, and the total amount deferred to date.

Respectfully submitted by,

### COLUMBIA GAS OF OHIO, INC.

<u>/s/ Joseph M. Clark</u> Joseph M. Clark, Counsel of Record

Stephen B. Seiple, Asst. General Counsel (0003809) Joseph M. Clark, Sr. Counsel (0080711) P.O. Box 117 290 W. Nationwide Blvd. Columbus, Ohio 43216-0117 Telephone: (614) 460-6988 E-mail: sseiple@nisource.com josephclark@nisource.com

(Willing to accept service by e-mail)

Attorneys for **COLUMBIA GAS OF OHIO, INC.** 

### **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 17th day of December, 2018 upon the parties listed below.

> <u>/s/ Joseph M. Clark</u> By: Joseph M. Clark

Attorney for COLUMBIA GAS OF OHIO, INC.

Larry S. Sauer Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, OH 43215-4203 larry.sauer@occ.ohio.gov

### Marion

<u>Description</u>: This was a former manufactured gas plant ("MGP") site located at the southwest corner of West Street and Canal Street, which have since been named Prospect Street and Columbia Street respectively, in Marion, Marion County, Ohio. This MGP site, formerly owned by Marion Gas-Light Company, was operated from 1862 until 1902. Review of historical information, including Sanborn Fire Insurance Maps, deeds and other records, indicates the facility contained a number of structures including retorts, a coal shed, a meter house, tar well and gas holders. This former MGP plant was demolished between 1908 and 1914, with the property being redeveloped as housing with approximately 18 houses being constructed in the footprint of the MGP. Columbia has reviewed its corporate history and has determined it is a successor to entities that owned and operated the MGP.

<u>Phase I Assessment</u>: This assessment started in 2005, with the establishment of a Community Relations Plan. Meetings were held with the Mayor of Marion and his staff, the Ohio Department of Health and the Ohio Environmental Protection Agency ("Ohio EPA"). By March 2006 access to the 18 properties for a Phase I Property Assessment, following Ohio EPA, Voluntary Action Program ("VAP") rules was completed. Phase I findings indicated that a sampling and analysis program was required to better understand the environmental condition of the site. This investigation, which provided for the collection and analysis of soil, soil vapor and groundwater samples, was completed in March 2006. These analyses resulted in a finding that soil vapor posed no undue risk to human health of the occupants. Groundwater analyses indicated the presence of MGP related compounds at concentrations above Ohio EPA standards. However, because groundwater at the site is not used for potable purposes these detections posed no current unacceptable risks to occupants. In addition, concentrations of several MGPrelated compounds, including benzene, naphthalene, and polyaromatic hydrocarbons were detected in soils above Ohio EPA VAP residential standards.

<u>Remediation</u>: Based on the above findings and an engineering study a recommendation was made to purchase 18 homes. An engineering review of these homes resulted in the conclusion these homes would not likely withstand the deep excavation of soils required to complete the remediation process. By the end of December 2006, all 18 homes had been purchased by Columbia Remainder Corp.<sup>1</sup> The entire area was then secured; asbestos abatement completed; with the 18 homes being demolished by mid-January 2007.

<u>Phase II Assessment:</u> This process provided for the completion of two additional investigation efforts designed to obtain additional information required by Ohio EPA VAP. Results of these activities have indicated that, in general, significant soil and groundwater impacts are limited to the former MGP footprint. These investigations were further supplemented by an additional investigation completed early in 2008 to fill remaining data gaps with a focused feasibility study having been conducted and received.

During the calendar year 2009 the City of Marion, assisted by Columbia, applied for and received a Clean Ohio Revitalization Grant that resulted in a partial funding of the work performed at this site. Work completed during the twelve month period ended November 2010 included quarterly groundwater sampling and reporting; waste disposal; and preparation of the remedial design.

During the twelve-month period ending in November 2011, a significant amount of work was completed at the former Marion MGP. Nine bids for planned remediation work at the site were received, evaluated and tabulated from qualified remediation contractors. A short list of three bidders was selected and then interviewed. EMS, the low bidder, was ultimately selected as the remediation contactor. Mobilization began in February 2011, and remediation was substantially completed by June 2011. Construction monitoring, real-time perimeter air monitoring and VAP Certified Professional oversight were also provided. More than 18,000 tons of contaminated soil and 100,000 gallons of water were removed and properly disposed off-site. Post excavation confirmation samples were collected and analyzed, indicating that remediation was complete. Site restoration activities, including sidewalk replacement, fence removal, grading and seeding, were then completed by early fall 2011. A meeting with the Ohio EPA in November 2011, under the VAP's technical assistance program, to provide a summary of the remediation activities completed to the Ohio EPA, prior to report preparation and No Further Action letter preparation.

During the twelve-month period, ending in November 2012, additional activities required under Ohio's VAP were completed, including data evaluation, groundwater classification, soil vapor modeling, multiple chemical adjustments on site data, preparation of a Remediation Completion Report, and preparation of a draft

<sup>&</sup>lt;sup>1</sup> On July 1, 2015, Columbia Remainder Corp. was transferred to Columbia Pipeline Group, the former affiliate of Columbia.

"no further action" ("NFA") letter and Phase II Property Assessment Report for Ohio EPA review, under the technical assistance program. This report was provided to the Ohio EPA in spring 2012, and comments were received on November 9, 2012. During the twelve-month period, ending in November 2013, additional activities required under Ohio's VAP were completed. The NFA was submitted to the Ohio EPA along with a request for a Covenant Not to Sue ("CNS"), in January 2013. Ohio EPA review comments were received in the second quarter 2013. Responses to comments were completed and, upon Ohio EPA concurrence, the Ohio EPA issued a CNS on October 31, 2013. A Securities Exchange Commission ("SEC") required determination of an appropriate contingent environmental liability for the site was also completed in 2013.

During the twelve-month period, ending in November 2014, additional activities required under Ohio's VAP and related to the CNS were completed. These activities included submittal of documentation and participation in a meeting with the Ohio EPA related to a random CNS audit conducted by the Ohio EPA. The final audit report has not been prepared by Ohio EPA.

No activities were performed during the twelve–month periods ending in November 2015, 2016, 2017, and 2018. No additional activities are expected at this location.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period January 2008 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$910,678.93. This amount was deferred previously.

### Bellevue

<u>Description</u>: This former MGP site is located on Howard Street, southwest of the intersection of Howard Street and Hamilton Street in Bellevue, Sandusky County, Ohio. The site is currently zoned as, and used for, residential purposes. A multi-unit residential structure and at least one private residence are located within the apparent footprint of the former MGP. The site is bounded to the south by active railroad tracks beyond which lie a manufacturing facility and a residential area. The site is bounded to the north and west by residential areas. The site is bounded to the east by several residences beyond which lies an apparent railcar maintenance facility.

Based on a review of readily available historical information, including the Sanborn Fire Insurance maps, the MGP was constructed prior to 1899, and consisted of a gas plant building and a gas holder. A rail siding was also located adjacent to the plant, likely used for coal delivery. The 1901 Brown's Directory of American Gas Companies ("Brown's Directory") indicates that the facility was in operation in 1901 and that both coal carbonization and water gas processes were used to produce gas. A comparison of the 1899 and 1906 Sanborn Fire Insurance Maps indicate that the MGP building was expanded during this time period. The 1904 Brown's Directory states that manufactured gas operations had ceased and transitioned to natural gas prior to 1904. Columbia has reviewed its corporate history and has determined it is a successor to entities that owned and operated the MGP.

<u>Phase II Site Investigation</u>: A Phase II Site Investigation was completed, and a Human Health Risk Assessment ("HHRA") was conducted in early 2012 to determine if further actions were necessary. Based on the HHRA, it was determined that the former MGP structures and a small amount of soil around the structures should be removed. Plans were developed to conduct these actions, and in the second quarter of 2012 meetings were held with local stakeholders including officials from the City of Bellevue and local residents to discuss the removal plans.

During the twelve-month period, ending in November 2013, additional activities required under Ohio's VAP were completed. Meetings were held with the Ohio EPA VAP staff in the third Quarter of 2013. Access agreements with the local property owners were negotiated and completed in November 2013. Remedial actions took place in December 2013, followed by the preparation of post-remediation removal action reports.

An SEC required determination of an appropriate contingent environmental liability for the site was also completed in 2013.

During the twelve-month period, ending in November 2014, additional activities required under Ohio's VAP were completed. These activities included remediation of the Bellevue site in December 2013, preparation of required reporting (Construction Completion Report) and other documentation under Ohio's VAP (including a Phase I Property Assessment Update Report and Phase II Property Assessment Report), and preparation of a No Further Action letter (dated 28 July 2014).

During the twelve-month periods, ending in November 2015, 2016, 2017, and 2018, there were no additional activities performed or required. No additional activities are expected at this location.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period July 2009 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$555,823.98. This amount was deferred previously.

### **Grandview Heights**

Description: These facilities were comprised of a former district office, service center, warehouse, meter shops and phone center located at 825 Burr Avenue, 860 Burr Avenue, 901 Burr Avenue, 909 Burr Avenue and 920 Goodale Street, Grandview Heights, Ohio. These properties were sold by Columbia in December 2008, pursuant to a Letter Agreement For Purchase of Real Estate, ("Letter Agreement") dated July 18, 2008, as amended, between Columbia and NRI Equity Land Investments, LLC ("NRI"), and joined by Nationwide Realty Investors, Ltd. The purpose of this Letter Agreement was to clarify, resolve and allocate the financial responsibilities for the environmental condition of certain portions of the property and to close the transaction as contemplated by the Letter Agreement. Pursuant to the Letter Agreement the parties agreed that certain tests and investigations documented the presence of lead and polynuclear aromatic hydrocarbons ("PAHs") on or under the property which require investigation, cleanup, removal action, remedial action or other corrective action. Columbia agreed to pay a portion of the cost of the investigation and remediation costs associated therewith and a portion of the costs of the investigation, cleanup, removal action, remedial action or corrective action undertaken with respect to the documented presence of lead and PAHs on the property through: (1) a reduction in the purchase price of the property set forth in Agreement by the sum of \$200,000; and, (2) payment to NRI of the sum of \$500,000 toward NRI's costs that it has incurred or will incur, in the performance of investigation, cleanup, removal action, remedial action or corrective action as consideration for NRI's assumption of this responsibility. This amount was based on Columbia's evaluation of a report prepared by NRI's consultant. This report included preliminary cost evaluations that included estimates ranging from a low of \$508,500 up to \$3,218,565 dependent upon the intended use of the land.

During the twelve-month periods ending in November 2015, 2016, 2017, and 2018, no activities were completed on Grandview Heights. No additional activities are expected at this location.

<u>Total Project Costs</u>: Total incremental costs incurred by Columbia during the January 2008 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$475,000. This amount was deferred previously.

### Swan Creek

<u>Description</u>: The former Toledo Gas Light and Coke Company site located at 333 South Erie Street, Toledo, was owned and operated by Columbia as a Service Center until it sold the property and building in March 2011. The site is in the process of being remediated in accordance with Ohio's VAP regulations by the new property owner, River Road Redevelopment H, LLC ("R3II"). While the site was originally entered into the VAP with Columbia as the remedial applicant, after purchasing the property, R3II is now the remedial applicant. The Ohio EPA issued a Covenant Not to Sue for the site on November 10, 2014.

The former MGP property, located at 333 South Erie Street, Toledo, is adjacent to Swan Creek. The indemnification with R3I1 does not cover remediation of Swan Creek. Columbia will manage any sediment investigation and remediation under a future regulatory scenario. Sediments have been subject to a preliminary ecological assessment and limited sampling which indicated some areas of MGP related impacts. The state and federal regulatory agencies have expressed interest in the status of Swan Creek as a tributary to the Maumee River which is an identified Area of Concern under the Federal Great Lakes Legacy Act. There is a documented history of multiple parties discharging to the creek. Additional sediment investigation will be necessary since the extent of impacts and responsibility for those impacts have yet to be determined. In 2011, Columbia authorized an evaluation of: 1) sediment remedial approaches; 2) potential participation in Great Lakes Legacy Act Funding; and, 3) the potential impacts from other sources.

During the twelve-month periods ending in November 2015, 2016, and 2017, no activities were completed on Swan Creek. During the most recent twelve-month period costs were incurred to monitor agency initiative to characterize Swan Creek sediment quality and to evaluate other potential contributors to Swan Creek sediment degradation.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the January 2008 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$138,451.17. This amount is comprised of \$55,963.33 previously deferred and \$82,487.84 (through November 2018) for work performed during the period December 2017 through November 2018. Attachment 5 sets forth a detailed breakdown of these expenses incurred during the period December 2017 through November 2018.

### Columbia Gas of Ohio, Inc. Summary of Toledo (Swan Creek) Environmental Remediation Expenses November 2011 through November 30, 2018

Line No.	Month	CE	ΑСΤΙΥ Τ	RAN CNTR	Amount	Description
1	November-11	3C23	07330	1121	28,000.00	Installation of data logger and summarization of sediment issues
2	Total through Noven	nber 30, 20	)11		28,000.00	
3 4	June-13 June-13	3C23 3C23	07901 07901	1031 1031		Environmental Refresh Cost Environmental Refresh Cost
5	Total				588.52	
6	Total December 201	2 - Novem	ber 2013		588.52	
7 8	March-17 March-17	3021 3021	05602 05602	E019 E019	22,203.72 16,593.61	Professional Services Professional Services
9	Total				38,797.33	
10	April-17	3021	05602	E019	3,902.05	Professional Services
11	Total				3,902.05	
12 13	June-17 June-17	3021 3021	05602 05602	E019 E019		Professional Services Professional Services
14	Total				3,412.93	
15	July-17	3021	05602	E019	6,262.50	Professional Services
16	Total				6,262.50	
17	Total December 201	6 - Novem	ber 2017		52,374.81	
18 19 20	March-18 March-18 March-18	3021 3021 3021	05605 05605 05605	E019 E019 E019	5,556.00	Professional Services Professional Services Professional Services
21	Total				32,973.59	
22 23	May-18 May-18	3021 3021	05602 05602	E019 E019	-	Professional Services Professional Services
24	Total				25,966.25	
25	June-18	3021	05602	E019	3,835.00	Professional Services

### Columbia Gas of Ohio, Inc. Summary of Toledo (Swan Creek) Environmental Remediation Expenses November 2011 through November 30, 2018

26	Total		3,835.00			
27 28	September-18 September-18	3021 3021	05602 05602	E019 E019	,	Professional Services Professional Services
29	Total			19,713.00		
30	Total December 20	17 - Nover	nber 2018		82,487.84	
31	Total All Payments				163,451.17	
32	Less: Company Fur	nded Amou	unt		25,000.00	
33	Net Deferred Amou	nt			138,451.17	

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### Fremont

<u>Description</u>: Columbia's predecessor companies are in the chain of title for a former MGP located on two parcels at Justice Street and Knapp Streets, Fremont, Sandusky County, Ohio. Columbia has reviewed its corporate history and has determined it is a successor to entities that owned and operated this former MGP. This finding resulted in Columbia's retention of a consultant to conduct a Phase I project assessment ("PA") in conformance with Ohio's VAP regulations. Community outreach and the Phase I PA were initiated in July 2011. The Phase I PA identified several areas of suspect environmental conditions related to the former MGP. Additional community outreach was conducted in June 2012 in advance of site investigation. In August 2012, Columbia's consultant conducted soils sampling, monitoring well installation and groundwater sampling. Data was reviewed in 2012 and additional site characterization was completed in 2013. An SEC required determination of an appropriate contingent environmental liability for the site was also completed in 2013.

During the twelve-month period, ending in November 2014, additional activities required under Ohio's VAP were completed, which included submittal of the July 2013 results to property owners. Additional environmental sampling as required under Ohio's VAP Phase II Assessment was completed in February 2014 (results submitted to property owners in May 2014) and November 2014. Columbia also met with Ohio EPA in June 2014 to discuss data and findings to date. Investigative site work continued into December 2014.

During the previous twelve-month period, ending November 2015, additional activities required under Ohio's VAP were completed, which included submitting the November – December 2014 results to property owners in February 2015. Additional sampling under Ohio's VAP Phase II Assessment was completed in March 2015, with results submitted to property owners in May 2015. The sample results from all field activities were evaluated and submitted to Ohio EPA in May 2015 under an Ohio EPA Technical Assistance ("TA") account. Columbia and its consultant met with Ohio EPA in July 2015 to discuss the sampling results to date and possible next steps in investigation.

During the twelve month period ending November 2016, a work plan for additional ground water investigation was submitted to the Ohio EPA in December 2015. After Ohio EPA commented on the plan in February 2016, additional ground water and soil investigation to comply with Ohio EPA VAP regulations were conducted in March, April, May and August 2016.

During the twelve-month period ending November 2017, a work plan to evaluate potential impacts to indoor air and sub-slab vapor (VI Sampling Work Plan) in- and offsite properties was submitted in February 2017 in accordance with Ohio's VAP program. This work plan was developed in response to feedback received from Ohio EPA after review of data collected from previous sampling events. After receiving comments from Ohio EPA a final VI Sampling Plan was submitted to the Ohio EPA in March 2017. During the second quarter of 2017, Columbia worked in cooperation with Ohio EPA to secure access to private properties for the implementation of the scope of work presented in the approved Work Plan. In August 2017, Columbia, its consultants, and Ohio EPA conducted site visits with each of the affected property owners to explain the scope of the VI Sampling Program. A sampling event was conducted in September 2017 and analytical results were submitted to Ohio EPA for distribution to the property owners. Ground water sampling of existing wells was also completed in accordance with the Ohio VAP during September 2017 and results distributed to Ohio EPA and land owners. The sites costs model was also reviewed and updated in 2017.

During the most recent twelve-month period ending in November 2018, additional investigation work to address data gaps was completed on both of the MGP parcels and has been identified as the Phase II investigation. This work included installation of monitoring wells, ground water sampling, and aquifer testing. Additional work will be completed in 2019 as part of this investigation.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period December 2010 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$933,166.76. This amount is comprised of \$557,611.04 previously deferred and \$375,555.72 (through November 2018) for work performed during the period December 2017 through November 2018. Attachment 7 sets forth a detailed breakdown of these expenses incurred during the period December 2018.

Line No.	Month	CE	ACTIV	TRAN CNTR	Amount	Description
1	September-11	3C23	07703	1053	488.75	Community relations services
2	Total				488.75	
3 4	October-11 October-11	3C23 3C23	07703 07703	1053 1053		Dues for MGP Consortium Site assessment
5	Total				33,913.63	
6	November-11	3C23	07703	1053	8,820.80	Site assessment
7	Total				8,820.80	
8	Total December 20	10 - Novem	ber 2011		43,223.18	
9	December-11	3C23	07703	1053	431.25	Professional Services
10	Total				431.25	
11 12 13	January-12 January-12 January-12	3C23 3C23 3C23	07703 07703 07703	1053 1053 1053	1,046.77	Site assessment Environmental refresh costs Environmental refresh costs
14	Total				3,310.44	
15	February-12	3C23	07703	1053	2,009.00	Cost modeling
16	Total				2,009.00	
17 18	June-12 June-12	3C23 3C23	07703 07703	1053 1053		Environmental refresh costs Environmental refresh costs
19	Total				739.69	
20	August-12	3C23	07703	1053	173.81	Environmental refresh costs
21	Total				173.81	
22 23	September-12 September-12	3C23 3C23	07703 07703	1053 1053		Site assessment Professional Services
24	Total				8,154.92	
25	October-12	3C23	07703	1053	222.64	Site assessment
26	Total				222.64	
27	November-12	3C23	07703	1053	4,155.89	Professional Services
28	Total				4,155.89	
29	Total December 20	11 - Novem	ber 2012		19,197.64	
30	December-12	3C23	07703	1053	2,791.88	Site Assessment/Professional Services

31	Total				2,791.88	
32 33 34 35	January-13 January-13 January-13 January-13	3C23 3B60 3B60 3B60	07703 07703 07703 07703	1053 1053 1053 1053	1,842.00 19,559.50	Site Assessment/Professional Services Site Assessment/Professional Services Site Assessment/Professional Services Site Assessment/Professional Services
36	Total				29,482.54	
37 38	March-13 March-13	3C23 3C23	07703 07703	1053 1053	,	Site Assessment/Professional Services Professional Services
39	Total				9,698.80	
40 41	April-13 April-13	3C23 3C23	07703 07703	1053 1053		Professional Services Professional Services
42	Total				1,362.06	
43 44	May-13 May-13	3C23 3C23	07703 07703	1053 1053		Professional Services Environmental Refresh Cost
45	Total				552.78	
46 47 48 49 50 51 52	June-13 June-13 June-13 June-13 June-13 June-13 June-13	3B60 3B60 3B60 3C23 3C23 3C23	07703 07703 07703 07703 07703 07703 07703	1053 1053 1053 1053 1053 1053 1053 1053	604.00 2,712.00 2,712.00 5,113.72 304.94	Site Assessment Site Assessment Site Assessment Professional Services Environmental Refresh Cost Environmental Refresh Cost
53	Total				12,905.24	
54	July-13	3C23	07703	1053	5,503.88	Professional Services
55	Total				5,503.88	
56 57 58	August-13 August-13 August-13	3C23 3B60 0072	07703 07703 07703	1053 1053 1053	150.00	Site Assessment/Professional Services Professional Services Environmental Refresh Cost
59	Total				6,314.63	
60 61 62 63 64 65	September-13 September-13 September-13 September-13 September-13 September-13	3C23 3B60 3B60 3B60 3B60 3B60	07703 07703 07703 07703 07703 07703	1053 1053 1053 1053 1053 1053 1053	1,655.55 1,655.55 2,752.00 48.75	Site Assessment/Professional Services Environmental Testing Environmental Testing Environmental Testing Environmental Testing Environmental Testing
66	Total				25,555.49	
67 68	October-13 October-13	3C23 0072	07703 07703	1053 1053		Site Assessment/Professional Services Environmental Refresh Cost
69	Total				36,498.84	

70 71	November-13 November-13	3C23 3C23	07703 07703	1053 1053	,	Professional Services Environmental Refresh Cost
72	Total				6,409.75	
73	Total December 20	12 - Novem	ber 2013		137,075.89	
74 75	December-13 December-13	3C23 3C23	07703 07703	1053 1053		Professional Services Environmental Refresh Cost
76	Total				853.79	
77 78	January-14 January-14	3C23 3B66	07703 07703	1053 1053		Professional Services Environmental Testing
79	Total				958.00	
80 81	February-14 February-14	3B60 3C23	07703 07703	1053 1053		Environmental Testing Professional Services
82	Total				2,424.55	
83 84	March-14 March-14	3C23 3B60	07703 07703	1053 1053		Professional Services Environmental Testing
85	Total				3,619.60	
86 87	April-14 April-14	3021 3021	05602 05602	E013 E013		Professional Services Environmental Refresh Cost
88	Total				2,838.26	
89 90	May-14 May-14	3021 3021	05602 05602	E013 E013		Professional Services Environmental Refresh Cost
91	Total				1,524.26	
92 93	June-14 June-14	3021 3021	05602 05602	E013 E013		Professional Services Environmental Refresh Cost
94	Total				3,712.26	
95 96	July-14 July-14	3021 3021	05602 05602	E013 E013		Environmental Testing Environmental Testing
97	Total				8,955.00	
98	August-14	3021	05602	E013	24,179.80	Site Assessment
99	Total				24,179.80	
100 101	October-14 October-14	3021 3021	05602 05602	E013 E013	,	Professional Services Professional Services

102	Total				13,206.08	
103	November-14	3021	05602	E013	2,153.34	Professional Services
104	Total				2,153.34	
105	Total December 20	)13 - Noven	ber 2014		64,424.94	
106 107	December-14 December-14	3021 3021	05602 05602	E013 E013	,	Site Assessment/Professional Services Site Assessment/Professional Services
108	Total				14,630.69	
109 110 111	February-15 February-15 February-15	3021 3021 3021	05602 05602 05602	E013 E013 E013	380.57	Site Assessment/Professional Services Environmental Refresh Cost Site Assessment/Professional Services
112	Total				45,491.72	
113 114 115 116 117 118 119 120 121	May-15 May-15 May-15 May-15 May-15 May-15 May-15 May-15 May-15	3021 3021 3021 3021 3021 3021 3021 3021	05602 05602 05602 05602 05602 05602 05602 05602 05602	E013 E013 E013 E013 E013 E013 E013 E013	2,050.00 3,185.50 3,346.00 3,437.31 10,551.17 2,285.00 8,812.20	Environmental Testing Environmental Testing Environmental Testing Environmental Testing Environmental Refresh Cost Site Assessment/Professional Services Environmental Testing Site Assessment/Professional Services Site Assessment/Professional Services
122	Total				54,319.13	
122 123	Total August-15	3021	05602	E013		Site Assessment/Professional Services
		3021	05602	E013		Site Assessment/Professional Services
123	August-15	3021 3021	05602 05602	E013 E013	2,823.69 2,823.69	Site Assessment/Professional Services Environmental Refresh Cost
123 124	August-15 Total				2,823.69 2,823.69	
123 124 125	August-15 Total September-15				2,823.69 2,823.69 346.67 346.67 1,124.94	
123 124 125 126 127	August-15 Total September-15 Total October-15	3021 3021	05602 05605	E013 E013	2,823.69 2,823.69 346.67 346.67 1,124.94	Environmental Refresh Cost Technical Assitance
123 124 125 126 127 128	August-15 Total September-15 Total October-15 October-15	3021 3021	05602 05605	E013 E013	2,823.69 2,823.69 346.67 346.67 1,124.94 1,855.29 2,980.23	Environmental Refresh Cost Technical Assitance
123 124 125 126 127 128 129	August-15 Total September-15 Total October-15 October-15	3021 3021 3021	05602 05605 05602	E013 E013 E013	2,823.69 2,823.69 346.67 346.67 1,124.94 1,855.29 2,980.23	Environmental Refresh Cost Technical Assitance Environmental Refresh Cost
123 124 125 126 127 128 129 130	August-15 Total September-15 Total October-15 October-15 Total November-15	3021 3021 3021 3021	05602 05605 05602 05602	E013 E013 E013	2,823.69 2,823.69 346.67 346.67 1,124.94 1,855.29 2,980.23 867.92	Environmental Refresh Cost Technical Assitance Environmental Refresh Cost
123 124 125 126 127 128 129 130 131	August-15 Total September-15 Total October-15 October-15 Total November-15	3021 3021 3021 3021	05602 05605 05602 05602	E013 E013 E013	2,823.69 2,823.69 346.67 346.67 1,124.94 1,855.29 2,980.23 867.92 867.92 121,460.05 1,780.69 992.36	Environmental Refresh Cost Technical Assitance Environmental Refresh Cost
123 124 125 126 127 128 129 130 131 132 133 134	August-15 Total September-15 Total October-15 October-15 Total November-15 Total Total December 20 December-15 December-15	3021 3021 3021 3021 014 - Novem 3021 3021	05602 05605 05602 05602 nber 2015 05605 05605	E013 E013 E013 E013 E013 E013	2,823.69 2,823.69 346.67 346.67 1,124.94 1,855.29 2,980.23 867.92 867.92 121,460.05 1,780.69 992.36	Environmental Refresh Cost Technical Assitance Environmental Refresh Cost Data Hosting Professional Services Technical Assitance

138	Total				93.30	
139	February-16	3021	05602	E013	1,758.73	Site Assessment/Professional Services
140	Total				1,758.73	
141	April-16	3021	05602	E013		Professional Services
142	April-16	3021	05605	E013	-	Technical Assitance
143	Total				1,561.27	
144	May-16	3021	05606	E013	2,390.39	Technical Assitance
145	May-16	3021	05602	E013	2,800.55	Professional Services
146	May-16	3021	05602	E013	1,115.00	Test America
147	Total				6,305.94	
148	June-16	3021	05602	E013	36.812.97	Professional Services
149	June-16	3021	05602	E013		Test America
		0021	00001	20.0		
150	Total				37,517.97	
151	July-16	3021	05602	E013	3.364.00	Test America
152	July-16	3021	05602	E013		Test America
153	July-16	3021	05602	E013		Test America
154	July-16	3021	05602	E013	17,929,61	Professional Services
155	July-16	3021	05602	E013		Professional Services
					.,	
156	Total				30,880.46	
157	August-16	3021	05602	E013	2.894.00	Test America
158	August-16	3021	05602	E013		Test America
159	August-16	3021	05602	E013	,	Test America
	- 3				,	
160	Total				8,218.00	
161	September-16	3021	05602	E013	2.085.13	Professional Services
162	September-16	3021	05602	E013		Test America
163	September-16	3021	05602	E013		Professional Services
					,	
164	Total				17,581.02	
165	October-16	3021	05602	E013	94.34	Professional Services
166	Total				94.34	
167	November-16	3021	05602	E013	930.89	Professional Services
168	Total				930.89	
169	Total December 20	15 - Novem	ber 2016		120,910.96	
170	December-16	3021	05602	E013	(10.866.50)	Environmental Testing
171	December-16	3021	05602	E013	( , , ,	Professional Services
-					_,	· · · · · · · · · · · · · · · · · · ·
172	Total				(5,596.14)	
173	January-17	3021	05602	E013	4,249.90	Professional Services

174	Total				4,249.90	
175 176	February-17 February-17	3021 3021	05602 05005	E013 E013	,	Professional Services Professional Services
177	Total				1,728.33	
178 179	March-17 March-17	3021 3021	05602 05602	E013 E013		Professional Services Professional Services
180	Total				9,924.94	
181	April-17	3021	05602	E013	1,440.00	Professional Services
182	Total				1,440.00	
183	May-17	3021	05602	E013	6,848.35	Professional Services
184	Total				6,848.35	
185 186 187 188	June-17 June-17 June-17 June-17	3021 3021 3021 3021	05602 05602 05602 05602	E013 E013 E013 E013	302.83 94.34	Professional Services Professional Services Professional Services Parcel Services
189	Total				3,857.77	
190 191	July-17 July-17	3021 3021	05606 05602	E013 E013		Professional Services Professional Services
192	Total				3,737.88	
193	August-17	3021	05602	E013	118.60	Professional Services
194	Total				118.60	
195 196 197 198 199 200	September-17 September-17 September-17 September-17 September-17 September-17	3021 3021 3021 3021 3021 3021	05602 05602 05602 05606 05005 05605	E013 E013 E013 E013 E013 E013	5,475.66 83.67 1,640.90 810.57	Professional Services Professional Services Professional Services Professional Services Web Services and Support Professional Services
201	Total				10,622.18	
202 203 204 205 206 207 208 209 210	October-17 October-17 October-17 October-17 October-17 October-17 October-17 October-17	3021 3021 3021 3021 3021 3021 3021 3021	05602 05602 05602 05602 05602 05602 05602 05602	E013 E013 E013 E013 E013 E013 E013 E013	6,618.66 45.09 37.86 10.87 300.00 8,309.00	Professional Services Professional Services Professional Services Professional Services Professional Services Environmental Testing Professional Services
211 212	November-17 November-17	3021 3021	05602 05602	E013 E013		Professional Services Professional Services

213	November-17	3021	05602	E013	2,854.00	Environmental Testing
214	November-17	3021	05602	E013	6,731.00	Environmental Testing
215	Total				23,988.35	
216	Total December 20	016 - Novem	ber 2017		76,318.38	
217 218 219 220 221	December-17 December-17 December-17 December-17 December-17	3021 3021 3021 3021 3021 3021	05602 05602 05606 05605 05605	E013 E013 E013 E013 E013	32.49 2,091.30 3,316.71	Professional Services Professional Services Professional Services Professional Services Professional Services
222	Total				20,295.42	
223	January-18	3021	05602	E013	31.75	Professional Services
224	Total				31.75	
225 226	February-18 February-18	3021 3021	05602 05602	E013 E013		Professional Services Professional Services
227	Total				12.49	
228 229	April-18 April-18	3021 3021	05602 05602	E013 E013		Professional Services Professional Services
230	Total				23.21	
231 232	May-18 May-18	4524 3021	05605 05602	E013 E013		Environmental Testing Professional Services
233	Total				19,253.35	
234	June-18	3021	05602	E013	443.27	Professional Services
235	Total				443.27	
236 237 238 239	July-18 July-18 July-18 July-18	3021 3021 3021 3021	05602 05602 05602 05602	E013 E013 E013 E013	293.50 2,146.50	Professional Services Environmental Testing Environmental Testing Environmental Testing
240	Total				12,627.62	
241 242 243 244 245 246	August-18 August-18 August-18 August-18 August-18 August-18	3021 3021 3021 3021 3021 3021	05005 05602 05605 05602 05605 05605	E013 E013 E013 E013 E013 E013	290.90 3,633.00 45,838.26 5,545.50	Professional Services Professional Services Environmental Testing Professional Services Environmental Testing Environmental Testing
247	Total				62,599.00	
248 249	September-18 September-18	3021 3021	05602 05605	E013 E013		Professional Services Project start up and coordination, wipe sampling investigation
250	September-18	3021	05602	E013	4,043.00	Professional Services

251	Total				56,975.25	
252 253 254 255	October-18 October-18 October-18 October-18	3021 3021 3021 3021	05602 05602 05602 05602	E013 E013 E013 E013	6,439.18 165,660.90	Professional Services Professional Services Professional Services Professional Services
256	Total				172,902.43	
257 258 259 260	November-18 November-18 November-18 November-18	3021 3021 3021 3021	05602 05602 05605 05605	E013 E013 E013 E013	17,196.44 5,984.00	Professional Services Professional Services Environmental Testing Environmental Testing
261	Total				30,391.93	
262	Total December 20	17 - Noverr	375,555.72			
263	Total All Payments		958,166.76			
264	Less: Company Fur	nded Amou	25,000.00			
265	Net Deferred Amou	nt			933,166.76	

### Fostoria

<u>Description</u>: In 2011 Columbia authorized a history consulting firm to research corporate successors to the late nineteenth century and early twentieth century entities known to have been associated with two former MGPs located in Fostoria, Ohio. Columbia has reviewed its corporate history and has determined it is a successor to entities that owned at least one of the former MGPs. Therefore, in 2011 Columbia authorized a consultant to conduct a Phase I Property Assessment at that MGP property in conformance with Ohio's VAP regulations. In addition, Columbia performed a historic evaluation to confirm site ownership, past operating practices and availability of historic information to aid in site evaluation. Because MGPs are a recognized environmental condition, Columbia will be conducting additional investigations at this MGP property in the future. Community and property owner outreach to allow access was initiated. An SEC required determination of an appropriate contingent environmental liability for the site was also completed in 2013.

During the twelve-month period, ending in November 2015, limited historical and background investigation activities were completed at the Fostoria I (Crocker Street) MGP site.

During the twelve-month period, ending in November 2016, limited access outreach activities were completed at the Fostoria I (Crocker Street) MGP site. Columbia will continue conducting community and property owner outreach to allow site access and will continue conducting investigations at this MGP property in the future, following Ohio's VAP.

During the twelve-month period, ending in November 2017, there were no additional activities performed. In 2018, additional efforts will be made to identify and locate subsequent owner(s) of the former MGP site because it has been determined the prior owner of record is deceased.

In the most recent twelve-month period, ending in November 2018, efforts were made to identify and contact the property owners in order to negotiate access to the Fostoria I (Crocker Street) MGP. The owner agreed to allow access to Columbia for investigation work in November 2018. No costs were incurred between December 2017 and November 2018 for this work. An on-site meeting will be conducted prior to the start of field work. Field work including on site soil sampling and analysis is anticipated to be conducted in 2019.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period December 2010 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$71,520.54. This amount was deferred previously.

### Athens

<u>Description</u>: The former Athens MPG (The Athens Gas Light Company and The Athens Gas Light and Electric Company) operated from about 1872 until about 1898. Historic Sanborn Fire Insurance Maps indicated the MGP structures included two gas holders, retort and purification buildings, and materials storage. To date Columbia has incurred expenses to implement targeted Phase I and Phase II historical research studies to determine corporate history and operation of The Athens Gas Light Company. Columbia has also incurred costs to develop a probabilistic cost model to estimate costs for future site investigation, community outreach, and possible remediation, if necessary. Columbia has also authorized several site visits by environmental experts to determine the location of former MGP. In addition, Columbia has incurred cost to prepare a preliminary communications plan identifying potential stakeholders including city, county and state entities, as well as possible private stakeholders.

During the twelve-month period ending in November 2014, Columbia met with stakeholders from the City of Athens, Ohio University, and Athens County in September as community outreach prior to starting the investigation. Columbia also reached out to the property owner to begin the process of gaining site access in order to conduct the Ohio VAP Phase I Property Assessment, which continued into 2015 and 2016. Phase II Property Assessment will likely be required under the VAP and will be conducted in the future.

During the twelve-month period, ending in November 2017, Columbia continued to focus efforts to contact the property owner in order to negotiate access and conduct the annual update of the contingent environmental liability for the site. To date Columbia has not secured access and no work has been initiated.

Work began on this site during the twelve-month period, ending in November 2018. Columbia obtained access from the City of Athens and Ohio University to sample around the MGP property. After evaluating the ground water sampling results as a result of this work, in which elevated volatile organics were measured, Ohio EPA required that Columbia evaluate indoor air in one apartment building on the MGP Property. Access to the MGP property was finally obtained so that this additional work could be completed in addition to the completion of a formal investigation on the MGP parcel that was historically not possible. Work performed also included community outreach efforts and meetings with the City of Athens, Ohio University, and the Athens County Health Department.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period December 2013 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$205,337.35. This amount is comprised of \$37,543.21 previously deferred and \$167,794.14 (through November 2018) for work performed during the period December 2017 through November 2018. Attachment 10 sets forth a detailed description of these expenses during the period December 2018.

Line No.	Month	CE	ACTIV	TRAN CNTR	Amount	Description
1 2	January-12 January-12	3C23 3C23	07601 07601	1520 1520		Environmental Refresh Cost Environmental Refresh Cost
3	Total				2,450.39	
4 5	June-12 June-12	3C23 3C23	07601 07601	1520 1520		Environmental Refresh Cost Environmental Refresh Cost
6	Total				739.69	
7	August-12	3C23	07601	1520	14,400.00	Professional Services
8	Total				14,400.00	
9	September-12	0072	07601	1520	173.81	Environmental Refresh Cost
10	Total				173.81	
11	October-12	3C23	07601	1521	120.74	Environmental Refresh Cost
12	Total				120.74	
13 14 15 16 17	November-12 November-12 November-12 November-12 November-12	3C23 3C23 3C23 3C23 3C23 3C23	07601 07601 07601 07601 07601	1521 1521 1521 1521 1521 1521	570.00 1,499.96 1,500.00	Site Assessment NFA Letter / Reporting Professional services Professional services Site Assessment
18	Total				5,109.54	
19	Total December 2	011 - Novem	ber 2012		22,994.17	
20	May-13	3C23	07601	1520	17.33	Environmental Refresh Cost
21	Total				17.33	
22 23	June-13 June-13	3C23 3C23	07601 07601	1521 1521		Environmental Refresh Cost Environmental Refresh Cost
24	Total				588.54	
25 26	October-13 October-13	3C23 3C23	07601 07601	1521 1521		Professional Services Phase II Property Assessment
27	Total				8,300.00	
28	Total December 2	012 - Novem	ber 2013		8,905.87	
29	March-14	3C23	07601	1521	6.59	Environmental Refresh Cost
30	Total				6.59	

31	April-14	3021	05602	E004	13.59	Environmental Refresh Cost
32	Total				13.59	
33	May-14	3021	05602	E004	162.13	Environmental Refresh Cost
34	Total				162.13	
35	June-14	3021	05602	E004	625.72	Environmental Refresh Cost
36	Total				625.72	
37 38	October-14 October-14	3021 3021	05602 05602	E004 E004		Professional Services Professional Services
39	Total				3,287.90	
40	November-14	3021	05602	E004	2,292.20	Professional Services
41	Total				2,292.20	
42	Total December 20	13 - Noven	ber 2014		6,388.13	
43	December-14	3021	05602	E004	468.35	Professional Services
44	Total				468.35	
45	January-15	3021	05602	E004	2,933.53	Professional Services
46	Total				2,933.53	
47	February-15	3021	05602	E004	380.58	Environmental Refresh Cost
48	Total				380.58	
49 50	March-15 March-15	3021 3021	05602 05602	E004 E004		Professional Services Environmental Refresh Cost
51	Total				929.78	
52	May-15	3021	05605	E004	560.00	Professional Services
53	Total				560.00	
54	September-15	3021	05602	E004	346.67	Environmental Refresh Cost
55	Total				346.67	
56	October-15	3021	05602	E004	1,855.29	Environmental Refresh Cost
57	Total				1,855.29	
58 59	November-15 November-15	3021 3021	05602 05602	E004 E004		Data Hosting Professional Services

60	Total				2,349.69	
61	Total December 20	)14 - Noven	ber 2015		9,823.89	
63	December-15	3021	05602	E004	1,780.69	Professional services
64	Total				1,780.69	
65 66	January-16 January-16	3021 3021	05602 05602	E004 E004		Professional services Professional services
67	Total				364.46	
68	March-16	3021	05602	E004	1,966.90	Professional services
69	Total				1,966.90	
70	April-16	3021	05602	E004	29.84	Professional services
71	Total				29.84	
72	October-16	3021	05602	E004	94.34	Professional services
73	Total				94.34	
74	Total December 20	)15 - Noven	nber 2016		4,236.23	
75 76	December-16 December-16	3021 3021	05602 05602	E004 E004		Professional Services Professional Services
77	Total				7,924.53	
	February-17	3021	05005	E004	18.11	Professional Services
	Total				18.11	
78	May-17	3021	29001	E004	19.75	Professional Services
79	Total				19.75	
80 81 82	June-17 June-17 June-17	3021 3021 3021	05602 05602 05602	E004 E004 E004	302.83	Professional Services Professional Services Professional Services
83	Total				972.31	
84	August-17	3021	05602	E004	118.60	Professional Services
85	Total				118.60	
86 87	September-17 September-17	3021 3021	05005 05602	E004 E004		Web Services and Support Professional Services
88	Total				894.24	

89 90 91 92 93	October-17 October-17 October-17 October-17 October-17	3021 3021 3021 3021 3021 3021	29001 29001 29001 05602 29001	E004 E004 E004 E004 E004	35.28 45.09 10.87	Professional Services Professional Services Professional Services Professional Services Professional Services
94	Total				170.56	
95	November-17	3021	29001	E004	76.82	Professional Services
96	Total				76.82	
97	Total December 20	16 - Novem	ber 2017		10,194.92	
98 99	December-17 December-17	3021 3021	29001 05602	E004 E004		Professional Services Professional Services
100	Total				122.59	
101	January-18	3021	29001	E004	31.75	Professional Services
102	Total				31.75	
103 104	February-18 February-18	3021 3021	29001 05602	E004 E004		Professional Services Professional Services
105	Total				12.49	
106 107	April-18 April-18	3021 3021	29001 05602	E004 E004		Professional Services Professional Services
108	Total				23.21	
109	May-18	3021	05602	E004	53.35	Professional Services
110	Total				53.35	
111 112 113	June-18 June-18 June-18	3021 3021 3021	05602 05602 05602	E004 E004 E004	443.27	Professional Services Professional Services Environmental Testing
114	Total				8,999.84	
115	July-18	3021	05602	E004	240.50	Professional Services
116	Total				240.50	
117 118 119 120 121 122 123 124	August-18 August-18 August-18 August-18 August-18 August-18 August-18 August-18	3021 3021 3021 3021 3021 3021 3021 3021	05602 05005 05602 05602 05602 05602 05602 05602	E004 E004 E004 E004 E004 E004 E004	696.00 984.00 2,060.00 2,029.00 2,322.00	Professional Services Professional Services Environmental Testing Environmental Testing Environmental Testing Environmental Testing Professional Services

125	August-18	3021	05602	E004	1,024.00	Environmental Testing
126	Total				42,225.26	
127 128	September-18 September-18	3021 3021	05005 05602	E004 E004	32,604.82	Professional Services Project start up and coordination, wipe sampling investigation
129	September-18	3021	05602	E004	10,145.55	Professional Services
130	Total				43,693.39	
131	October-18	3021	05602	E004	5,336.00	Environmental Testing
132	October-18	3021	05602	E004		Environmental Testing
133	October-18	3021	05602	E004		Professional Services
134	Total				10,799.35	
135	November-18	3021	05602	E004	8 665 37	Professional Services
136	November-18	3021	05602	E004	- ,	Professional Services
137	November-18	3021	05602	E004	-	Professional Services
138	Total			61,592.41		
139	Total December 20	17 - Novem	ber 2018	167,794.14		
140	Total All Payments			230,337.35		
141	Less: Company Fu	nded Amou	int	25,000.00		
142	Net Deferred Amou	int		205,337.35		

# **ATTACHMENT 11**

## Portsmouth

<u>Description</u>: The former Portsmouth MGP operated in the vicinity of West Second, Madison and Jefferson Streets in Portsmouth between 1884 and 1905. Historical Sanborn Fire Insurance Maps indicated that MGP structures included three gas holders, retort and purifications buildings and materials storage. Columbia has reviewed its corporate history and has determined it is a successor to entities that owned and operated the MGP.

Work began on this site during the twelve-month period ending in November 2014. Activities related to or required under Ohio's VAP were completed, including contacting property owners and arranging for access to the properties within the former MGP footprint, preparing communications related documentation including fact sheets for distribution to stakeholders, planning for Phase I and Phase II Assessments under Ohio's VAP, and mobilizing to the site and beginning both Phase I and Phase II Property Assessment. Phase I and Phase II Property Assessment work continued through much of December 2014, with laboratory analysis and data evaluation continuing through early 2015.

During the twelve-month period ending November 2015, additional data collection (sampling and analysis) was completed on two of the MGP parcels and is identified as a supplemental Phase II investigation. Work performed also included additional community outreach efforts and multiple meetings with site property owners.

During the twelve-month period ending November 2016, additional data collection (sampling and analysis) was completed on two of the MGP parcels and is identified as a supplemental Phase II investigation. Work performed also included additional community outreach efforts and multiple meetings with site property owners. One last round of limited investigation off-site will be needed and is anticipated to occur in late-2016 once access is obtained.

During the twelve-month period ending in November 2017, additional activities were performed to finalize investigation delineation and update the sites cost model. Access negotiations were held with the owners of one of the two parcels (Portsmouth Cement & Lime Co., aka PCL) and access has been granted for remediation of that northern parcel. Bid design specification and request for proposals will be completed in late 2017/early 2018 with expected remediation on the northern parcel in winter of 2018.

During the twelve-month period ending in November 2018, the remedial design and specification and bid package was completed for remediation work on the northern parcel. Bidding was completed and the remediation work was awarded. Remediation work was completed and a No Further Action (NFA) Letter was prepared for the site by the Sites Ohio Certified Professional.

During the twelve-month period ending November 2019, efforts will be made to negotiate an access agreement with the owner of the southern portion of the former MGP, to allow site remediation. It is possible, if the access agreement is finalized early in the year, that remedial design and bidding could be completed, with remediation effort taking place in late 2019.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period December 2013 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$1,422,383.73. This amount is comprised of \$493,149.43 previously deferred and \$929,235.30 (through November 2018) for work performed during the period December 2017 through November 2018. Attachment 12 sets forth a detailed description of these expenses during the period December 2018.

# **ATTACHMENT 12**

Line No.	Month	CE	ACTIV	TRAN CNTR	Amount	Description
1	September-09	3C23	07905	1541	1,450.00	Environmental Refresh Cost
2	Total				1,450.00	
3	Total December 20	08 - Noven	nber 2009		1,450.00	
4	November-11	3C23	07905	1541	3,000.00	Environmental Refresh Cost
5	Total				3,000.00	
6	Total December 20	10 - Noven	nber 2011		3,000.00	
7	March-12	3C23	07905	1541	46.41	Professional Services
8	Total				46.41	
8	June-12	3C23	07905	1541	3,860.15	Targeted Historical Research
10	Total				3,860.15	
11 12	August-12 August-12	3C23 3C23	07905 07905	1541 1541		Site Visit and Data Review Targeted Historical Research
13	Total				9,153.53	
14	September-12	3C23	07905	1541	1,242.27	Site Visit and Data Review
15	Total				1,242.27	
16 17	October-12 October-12	3C23 3C23	07905 07905	1541 1541		Targeted Historical Research Property Assessment
18	Total				2,615.75	
19	Total December 20	11 - Noven	nber 2012		16,918.11	
20	January-13	3C23	07905	1541	944.25	Targeted Historical Research
21	Total				944.25	
22	May-13	3C23	07905	1541	17.35	Environmental Refresh Cost
23	Total				17.35	
24 25	June-13 June-13	3C23 3C23	07905 07905	1541 1541		Environmental Refresh Cost Environmental Refresh Cost
26	Total				588.52	
27	November-13	3C23	07905	1541	2.35	Environmental Refresh Cost
28	Total				2.35	
29	Total December 20	12 - Noven	nber 2013		1,552.47	

#### Columbia Gas of Ohio, Inc. Summary of Portsmouth Environmental Remediation Expenses September 2009 through November 30, 2018

30	December-13	3C23	07905	1541	54.19	Environmental Refresh Cost
31	Total				54.19	
32	March-14	3C23	07905	1541	3,492.29	Professional Services
33	Total				3,492.29	
34	April-14	3021	05602	E017	4,461.51	Site Visit and Data Review
35	April-14	3021	05602	E017	13.59	Environmental Refresh Cost
36	Total				4,475.10	
37	May-14	3021	05602	E017	162.13	Environmental Refresh Cost
38	Total				162.13	
39	June-14	3021	05602	E017	1 613 11	Site Visit and Data Review
40	June-14	3021	05602	E017		Professional Services
41	June-14	3021	05602	E017		Community Relations Support
42	June-14	3021	05602	E017	625.72	Environmental Refresh Cost
43	Total				14,232.10	
44	August-14	3021	05602	E017	2,373.07	Community Relations Support
45	Total				2,373.07	
46	September-14	3021	05602	E017	801.90	Community Relations Support
47	Total				801.90	
48	October-14	3021	05602	E017	2,588.45	Community Relations Support
49	Total				2,588.45	
50	November-14	3021	05602	E017	3,600.00	Site Access
51	Total				3,600.00	
52	Total December 2	2013 - Novem	ber 2014		31,779.23	
53	December-14	3021	05602	E017	550.33	Project Management
54	December-14	3021	05602	E017		Site Visit and Data Review
55	December-14	3021	05602	E017	,	Community Relations Support
56	December-14	3021	05602	E017		Site Investigation
57	December-14	3021	05602	E017		Community Relations Support
57	December-14	3021	05602	EUT	1,047.10	Community Relations Support
58	Total				40,913.22	
59	January-15	3021	05602	E017	144.380.35	Site Investigation
60	January-15	3021	05602	E017		Professional Services
	T			<u> </u>	_,	
	C - t - l				4 4 4 0 5 0 0 5	

144,650.35

61 Total

62 63	February-15 February-15	3021 3021	05602 05602	E017 E017		Environmental Refresh Cost Professional Services
64	Total				759.07	
65 66 67 68	March-15 March-15 March-15 March-15	3021 3021 3021 3021	05602 05602 05602 05602	E017 E017 E017 E017	960.24 2,933.53 270.00	Site Investigation Project Management Professional Services Professional Services
69	Total				8,163.90	
70 71	April-15 April-15	3021 3021	05602 05602	E017 E017		Project Management Project Management
72	Total				3,715.74	
73 74 75 76 77	May-15 May-15 May-15 May-15 May-15	3021 3021 3021 3021 3021 3021	05602 05602 05602 05602 05602	E017 E017 E017 E017 E017	434.05 1,753.38 19,921.78	Environmental Testing Project Management Project Management Site Investigation Environmental Refresh Cost
78	Total				49,260.59	
79 80 81	June-15 June-15 June-15	3021 3021 3021	05602 05602 05602	E017 E017 E017	2,151.09	Environmental Testing Professional Services Site Investigation
82	Total				41,021.59	
83 84 85	July-15 July-15 July-15	3021 3021 3021	05602 05602 05602	E017 E017 E017	446.34	Site Investigation Project Management Site Investigation
86	Total				8,886.61	
87 88	August-15 August-15	3021 3021	05602 05602	E017 E017		Project Management Project Management
89	Total				11,678.74	
90	September-15	3021	05602	E017	346.66	Environmental Refresh Cost
91	Total				346.66	
92 93 94 95	October-15 October-15 October-15 October-15	3021 3021 3021 3021	05602 05602 05602 05602	E017 E017 E017 E017	3,237.12 1,624.38 1,855.29	Project Management Site Investigation and Data Review Data Review Environmental Refresh Cost
96	Total				7,196.05	
97 98	November-15 November-15	3021 3021	05602 05602	E017 E017		Data Hosting Data Review

99	November-15	3021	05602	E017

### 670.21 Soil Boring & Well Installation

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100 101	November-15 November-15	3021 3021	05602 05602	E017 E017		Project Management Off-Site Access Support
102	Total				8,752.74	
103	Total December 2	014 - Noven	1ber 2015		325,345.26	
104 105 106	December-15 December-15 December-15	3021 3021 3021	05605 05602 05602	E017 E017 E017	4,290.00	Professional services Building Materials Professional services
107	Total				6,850.69	
108 109	January-16 January-16	3021 3021	05602 05602	E017 E017	•	Professional services Professional services
110	Total				8,698.35	
111 112 113	February-16 February-16 February-16	3021 3021 3021	05602 05602 05602	E017 E017 E017	11,004.50	Professional services Environmental Testing Professional services
114	Total				30,320.81	
115 116 117 118	April-16 April-16 April-16 April-16	3021 3021 3021 3021	05602 05602 05602 05602	E017 E017 E017 E017	16,424.17 6,755.02	Professional services Professional services Professional services Professional services
119	Total				23,785.17	
120	May-16	3021	05602	E017	3,009.73	Professional services
121	Total				3,009.73	
122	June-16	3021	05602	E017	768.19	Professional services
123	Total				768.19	
124	July-16	3021	05602	E017	1,461.00	Environmental Testing
125	Total				1,461.00	
126	September-16	3021	05602	E017	3,434.77	Professional services
127	Total				3,434.77	
128 129	October-16 October-16	3021 3021	05602 05602	E017 E017		Professional services Professional services
130	Total				1,271.27	
131	November-16	3021	05602	E017	2,831.00	Land Survey
132	Total				2,831.00	

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134 135	December-16 December-16	3021 3021	05602 05602	E017 E017		Professional Services Environmental Testing
136	Total				2,657.68	
137 138	January-17 January-17	3021 3021	05602 05602	E017 E017	•	Professional Services Professional Services
139	Total				14,856.80	
140 141	February-17	3021 3021	05602 05602	E017 E017	1,377.46 314.16	
141	February-17 February-17	3021	05002	E017 E017		Professional Services
143	Total				1,709.74	
144	June-17	3021	05602	E017	-	Professional Services
145 146	June-17 June-17	3021 3021	05602 05602	E017 E017		Professional Services Professional Services
147	Total				1,184.29	
148	July-17	3021	05602	E017	1,536.40	Professional Services
149	Total				1,536.40	
150	August-17	3021	05602	E017		Professional Services
151 152	August-17 August-17	3021 3021	05602 05602	E017 E017		Professional Services Professional Services
153	Total				644.36	
154	September-17	3021	05005	E017		Web Services and Support
155	September-17	3021	05602	E017		Professional Services
156	Total				894.24	
157 158	October-17 October-17	3021 3021	05602 05602	E017 E017		Professional Services Professional Services
158	October-17	3021	05602	E017 E017		Professional Services
160	October-17	3002	05605	E017		Building Materials
161	October-17	3021	05602	E017		Professional Services
162	October-17	3021	05602	E017		Professional Services
163	October-17	3021	05602	E017		Professional Services
164	Total				32,112.05	
165	November-17	3021	05602	E017	76.82	Professional Services
166	Total				76.82	
167	Total December 2	016 - Noven	nber 2017		55,672.38	
168 169	December-17 December-17	3021 3021	05602 05602	E017 E017		Professional Services Professional Services

170	December-17	3021	05602	E017	615.49	Professional Services
171	December-17	3021	05602	E017	90.10	Professional Services

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172	Total				1,360.31	
173	January-18	3021	05602	E017	31.75	Professional Services
174	Total				31.75	
175 176	February-18 February-18	3021 3021	05602 05603	E017 E017		Professional Services Professional Services
177	February-18	3021	05602	E017		Professional Services
178	Total				17,092.41	
179	March-18	3021	05602	E017	79.37	Professional Services
180	March-18	3021	05603	E017	4,334.11	Professional Services
181	March-18	3021	05602	E017	9,558.58	Professional Services
182	Total				13,972.06	
183	April-18	3021	05602	E017	1.34	Professional Services
184	April-18	3021	05603	E017	13,800.68	Professional Services
185	April-18	3021	05602	E017	21.87	Professional Services
186	Total				13,823.89	
187	May-18	3021	05602	E017	53.38	Professional Services
188	May-18	3021	05603	E017		Professional Services
189	Total				654,622.15	
190	June-18	3021	05603	E017	47,485,85	Professional Services
191	June-18	3021	05603	E017		Professional Services
192	June-18	3021	05602	E017		Professional Services
193	Total				48,481.65	
194	July-18	3021	05602	E017	240.50	Professional Services
195	Total				240.50	
196	August-18	3021	05602	E017	625.19	Professional Services
197	August-18	3021	05005	E017	94.34	Professional Services
198	August-18	3021	05602	E017	290.90	Professional Services
199	August-18	3021	05603	E017	20,704.19	Professional Services
200	August-18	3021	05602	E017	706.00	Environmental Testing
201	August-18	3021	05603	E017	85,520.46	Professional Services
202	August-18	3021	05603	E017	10,040.53	Professional Services
203	Total				117,981.61	
204	September-18	3021	05603	E017	12.473.40	Professional Services
205	September-18	3002	05605	E017		Building Materials
206	September-18	3021	05005	E017		Project start up and coordination, wipe sampling investigation

207	Total			43,416.42			
208 209	October-18 October-18	3021 3021	05602 05603	E017 E017		Professional Services Environmental Testing	

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210 211 212	October-18 October-18 October-18	3021 3021 3021	05603 05603 05603	E017 E017 E017	353.00	Professional Services Environmental Testing Environmental Testing
213	Total				9,414.70	
214 215 216 217	November-18 November-18 November-18 November-18	3021 3021 3021 3021	05603 05603 05603 05602	E017 E017 E017 E017	993.53 1,013.40	Professional Services Professional Services Professional Services Professional Services
218	Total				8,797.85	
219	Total December 20	nber 2018		929,235.30		
220	Total All Payments			1,447,383.73		
221	Less: Company Fu	ınt		25,000.00		
222	Net Deferred Amo			1,422,383.73		

# **ATTACHMENT 13**

## Lorain

<u>Description</u>: In 2013 and 2014, Columbia authorized a history consultant firm to research corporate successors to the late nineteenth century and early twentieth century entities known to have been associated with the former MGP Site located in Lorain, Ohio. In addition, Columbia asked that this review include a confirmation of site ownership, past operating practices, and available historic information to aid in future site evaluation. Columbia has reviewed its corporate history and has determined that it is a successor to entities that owned and/or operated the Lorain MGP. Because MGPs are a recognized environmental condition, Columbia will be conducting additional investigations at this property in the future. An SEC-required determination of an appropriate contingent environmental liability for the site was also developed.

During the twelve-month period ending in November 2014, limited activities were completed to finish the historic evaluation and update the contingent environmental liability.

No activities were performed during the twelve–month periods ending in November 2015, 2016, 2017, and 2018. In the future, Columbia will conduct investigations consistent with Ohio VAP regulations and conduct community outreach and negotiate access as required.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period December 2013 through November 2018, exclusive of the \$25,000 to be funded by Columbia, were \$1,473.00. This amount was deferred previously.

# **ATTACHMENT 14**

Accounting Period	Marion \$	Bellevue \$	Goodale \$	Toledo (Swan Creek) \$	Fremont \$	Fostoria \$
Prior Reporting Periods	910,678.93	555,823.98	475,000.00	55,963.33	557,611.04	71,520.54
Dec. 2017 - Nov. 2018	-	-	-	82,487.84	375,555.72	-
Total	910,678.93	555,823.98	475,000.00	138,451.17	933,166.76	71,520.54

### Attachment 14

Athens \$	Portsmouth \$	Lorain \$	Total \$
37,543.21	493,148.43	1,473.00	3,158,762.46
167,794.14	929,235.30	-	1,555,073.00
205,337.35	1,422,383.73	1,473.00	4,713,835.46

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Case No(s). 08-0606-GA-AAM

Summary: Annual Report of Environmental Investigation and Remediation Costs Deferral electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.