

**BEFORE  
THE OHIO POWER SITING BOARD**

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| In the Matter of Columbia Gas of Ohio, | ) |                         |
| Inc.'s Letter of Notification for the  | ) | Case No. 19-2148-GA-BLN |
| Marysville Connector Pipeline Project. | ) |                         |
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**INITIAL COMMENTS OF THE  
OHIO GAS ACCESS PARTNERSHIP, INC.**

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**I. INTRODUCTION**

Pursuant to Ohio Adm.Code 4906-4-08(A), the Ohio Gas Access Partnership, Inc. (“OGAP”) submits these initial comments for the Board’s consideration on the Columbia Gas of Ohio, Inc. (“Columbia”) Letter of Notification Application for the Marysville Connector Pipeline Project (the “Project”). OGAP’s current members include both private and public entities located in Franklin, Logan, Madison, and Union counties, and have an interest in pursuing long-term regional solutions to current natural gas capacity concerns. OGAP appreciate Columbia’s recognition that there are natural gas supply constraints in western Central Ohio, but believes that the Project is not an effective or correct way to address those concerns. To that end, OGAP has the following initial comments on the Project and the Letter of Notification Application.

**II. INITIAL COMMENTS**

**A. An Accelerated Application Process is not Appropriate for the Project**

Because the Project appears to be part of a larger pipeline project (the Northern Loop Project), the Board should review the Project as part of the Northern Loop Project to the extent the Northern Loop Project is subject to the Board’s jurisdiction. The Northern Loop Project is “designed to bring natural gas from pipelines on the eastern side of Franklin County, where supplies are abundant, to areas north and west of Columbus”, and will likely connect with the

Marysville Connector.<sup>1</sup> Columbia itself refers to the Northern Loop and the Marysville Connector **as a single project**.<sup>2</sup>

The Board can also take note of public statements that support a finding that the Marysville Connector is part of a much longer pipeline system. Published news reports describe the Project and the Northern Loop Project as part of a single “initiative”.<sup>3</sup> Indeed, both the Project and the Northern Loop Project have essentially identical construction schedules (February 2022) and projected in-service dates.<sup>4</sup> Additionally, the southeastern terminus of the Project, as shown in Letter of Notification Application Appendix A, Figure 2 and Appendix B, Figure 1, does not connect to any other Columbia gas pipeline, and appears to be located in an open rural area far from any development. This is very likely where the Northern Loop Project will connect to the Project which raises the question and issue of whether the Project is part of a longer pipeline (and therefore not eligible for an accelerated application).

Instead of filing a standard certificate application, Columbia has filed a letter of notification application under R.C. 4906.03(F)(3) for only the Marysville Connector.<sup>5</sup> Columbia states in its letter of notification application that the Project qualifies for accelerated treatment

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<sup>1</sup> <https://www.columbiagasohio.com/services/work-in-your-neighborhood/northern-loop-project> “How does the Northern Loop project answer the need for new gas supplies?” (Last visited January 2, 2020.)

<sup>2</sup> See Updates - <https://www.linkedin.com/company/columbia-gas-of-ohio->. (“Proud to share **one** of our biggest projects to date: The Columbus Northern Loop and Marysville Connector. Exciting to see this area's growth.”) (Emphasis added) (Last visited January 2, 2020.)

<sup>3</sup> <https://www.10tv.com/article/columbia-gas-planning-135-million-pipeline-project-central-ohio-2019-dec> (“The final phase is currently in the planning stages and will run from southern Delaware County to southwest Union County, where it will connect to the existing gas distribution system. Another part of the initiative, called the Marysville Connector project, is designed to bring natural gas to Union County.”) (Last visited January 2, 2020).

<sup>4</sup> Compare Columbia Letter of Notification Application at 4 (“Installation of the proposed pipeline is scheduled to begin on or about February 21, 2022, and the in-service date (completion date) of this Project is expected to be on or about December 26, 2022.”) and Northern Loop Timeline: <https://www.columbiagasohio.com/services/work-in-your-neighborhood/northern-loop-project> (“We hope to receive approval of the project by 2020 so that construction can take place in 2022, with the line going into service by the end of that year.”) (Last Visited January 2, 2020)

<sup>5</sup> R.C. 4906.03(F)(3) empowers the Board to adopt rules for accelerated review of a “gas pipeline that is not more than five miles in length or is primarily needed to meet the requirements of a specific customer or specific customers.” The Board, through Ohio Adm.Code 4906-1-01, Appendix B, has established a letter of notification process for pipelines or pipeline segments greater than one mile in length but not greater than five miles in length.

under a Letter of Notification because it is 4.78 miles in distance. Columbia, however, does not identify any specific customer or customers in its application, instead noting that the purpose of the Project is for economic development near Marysville, Union County, Ohio and system reliability. (Columbia Letter of Notification Application at 2). The lack of detail on the Project supports, at a minimum, an investigation whether the Project and its likely connection to the Northern Loop Project together constitute a single major utility facility, as that term is defined under R.C. Chapter 4906. Segments of a pipeline system cannot be truncated for purposes of an OPSB application, and the Project with the rest of the pipeline would require a standard application filing if over five miles in length.

A standard application filing for the Project and the Northern Loop Project pipeline connecting to the Project (to the extent the pipeline is subject to the Board's jurisdiction) will allow all interested parties to engage in a fuller and more comprehensive consideration of the supply issues facing western Central Ohio. It will also afford the Board and the Board's Staff more time to complete a review of the overall project, including the need for the pipeline as a whole and to determine if that specific multi-million dollar investment is in the public interest. The standard certificate process would also require Columbia to expressly consider alternative routes for the Project, and to identify and discuss an alternate route for the Project, in addition to the "preferred" route identified in the Letter of Notification application. For example, an alternative route could be another source for natural gas supply from existing interstate pipelines such as the Rockies Express Pipeline.

To ensure the Marysville Connector is appropriately presented to the Board, Columbia should be required to withdraw the letter of notification application and refile a standard application for the pipeline that will make up the Marysville Connector and the portion of the

Northern Loop Project connecting to the Marysville Connector (to the extent the pipeline is subject to the Board's jurisdiction).

**B. Other Alternatives to Alleviate Natural Gas Supply Concerns in Western Central Ohio should be Explored**

OGAP is concerned that the Project is not the best comprehensive, regional, long-term solution to the area's energy needs, especially as it could easily preclude other investment from Columbia, either alone or in partnership with other entities, to bring natural gas supply to the area. Given the ongoing growth in the area, OGAP is concerned that the Project is an expensive and short-term action that will drive up costs for Columbia's rate-payers without solving the natural gas supply issue in the area.

Rather than a short-term fix, OGAP believes that a long-term solution can be achieved by developing connections to an existing interstate pipeline. For example, the Rockies Express Pipeline ("REX") is a 1,698-mile natural gas pipeline system that spans from Rio Blanco County, Colorado, to Monroe County, Ohio. REX became fully operational in November 2009 with a capacity of 1.8 billion cubic feet per day.<sup>6</sup> REX runs through southwestern Central Ohio, including Fayette County and Pickaway County.<sup>7</sup> OGAP believes that a pipeline running north from REX west of Columbus, through Madison County and into the area in Union County in which the Project is planned, is a better solution to the gas supply issues in western Central Ohio. A REX pipeline connection could be routed through less populated areas, have fewer cultural and environmental impacts, and bring more natural gas supply to the area when compared to the Project.

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<sup>6</sup> <https://pipeline.tallgrassenergy.com/Pages/Content.aspx?pipeline=501&type=SMRY> (Last Visited January 2, 2020)

<sup>7</sup> <https://pipeline.tallgrassenergy.com/Content/General/Tallgrass%20System%20Map.pdf> (Last Visited January 2, 2020)

The Board should fully evaluate all potential alternatives as it evaluates whether the Project is in the public interest and balance whether Columbia's plan warrants the impact and investment.

**C. Good Cause Exists for the Board to Suspend Consideration of the Project's Accelerated Certificate Application and set the Matter for Hearing**

Under rules applicable to accelerated certificate applications, the Project could be automatically approved no sooner than seven days after the issuance of a staff report and no later than ninety days after the filing of the application. Ohio Adm.Code 4906-6-10(A). However, the Board can, upon good cause, suspend consideration of an accelerated certification application. Ohio Adm.Code 4906-6-09(A). The Board also has the discretion to set the matter for hearing. Ohio Adm.Code 4906-6-09(C). Given the concerns raised by OGAP with respect to the Project, a hearing will allow for a full discussion and consideration of need and the public interest if the application is allowed to proceed as a letter of notification.

**III. CONCLUSION**

The Ohio Gas Access Partnership is dedicated to developing viable and long-term solutions to resolve the natural gas constraints that exist in western Central Ohio. Long-term solutions will require significant capital investment by many entities, including Columbia and other natural gas utilities, like Vectren Energy Delivery of Ohio. The Project, which actually appears to be part of a much longer pipeline, is not a long-term solution and if implemented will result in capital being diverted to build a pipeline that will not meet the needs of the region and will not be in the public interest. That is why a standard application should be prepared and submitted for the portion of the pipeline system that is subject to the Board's jurisdiction, and not just for the Marysville Connector.

OGAP appreciates the opportunity to submit these comments and reserves the right to file additional comments throughout the proceeding.

Respectfully submitted,

/s/ Michael J. Settineri

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Summary: Comments Initial Comments electronically filed by Mr. Michael J. Settineri on behalf of Ohio Gas Access Partnership, Inc.