

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion Energy) Case No. 15-1712-GA-AAM
Ohio for Approval to Change Accounting)
Methods

**ANNUAL REPORT OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO**

The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or the Company), pursuant to the Commission’s November 3, 2016 Opinion and Order adopting the Pipeline Safety Management Program (PSMP), respectfully submits its annual report detailing DEO’s PSMP-related expenses deferred in calendar year 2020 and a description of activity in 2020 on PSMP initiatives. In support of its annual report, DEO states as follows:

1. DEO is an Ohio corporation engaged in the business of providing natural gas service to customers in Ohio and, as such, is a “natural gas company” and “public utility” as defined by R.C. 4905.03(E) and 4905.02(A), respectively.
2. On November 3, 2016, in accordance with R.C. 4905.13, the Commission approved DEO’s application to establish a regulatory asset to defer up to \$15 million annually through the PSMP to reduce key risks, continue to ensure the safe and reliable operation of its system, and ensure compliance with pipeline safety laws. The Commission initially required DEO to file an annual report for its PSMP by June 1 each year, beginning in 2017 for calendar year 2016 expenditures, detailing the deferred expenses, baseline performance levels for each safety initiative, safety performance improvements compared to the baselines, results of ongoing and future investigations, any mid-term adjustments, and efforts towards identifying efficiencies and implementing cost-savings measures. The Commission further required DEO’s annual report to include an audit report prepared by DEO’s external auditor summarizing its

findings with respect to the accuracy of DEO's accounting for PSMP-related expenditures.

3. The Commission also established that, with the filing of the annual report, Staff should conduct an annual review of reported program expenditures and file a Staff Report no later than 90 days subsequent to the annual report filing. Once the Staff Report is filed, DEO is granted 30 days to accept Staff's recommendations or to object thereto.

4. The Commission modified and clarified these procedures in its Supplemental Finding and Order issued in this case on March 11, 2020. The Commission modified the filing schedule, requiring DEO to file its annual report on or before September 1 of each year. The Commission also clarified the process for including new PSMP initiatives. New initiatives must be proposed in the appropriate annual report, and if Staff objects to a new initiative in its Staff Report, DEO may not begin deferring expenses associated with a new initiative until the Commission issues an order approving the inclusion of the new initiative.

5. In support of this annual report, DEO includes the following appendices:

- **Attachment A:** Schedule of Deferred Costs for the Twelve Months Ended December 31, 2020
- **Attachment B:** Report Prepared by DEO's Independent Auditor
- **Attachment C:** Programmatic Review of PSMP Initiatives for 2020

6. The programmatic review contains various metrics, statistics, and other measures to assist in gauging and improving the effectiveness of these programs. (*See* Application ¶¶ 9–10 (Oct. 1, 2015).) In accordance with the stipulation and application, the measures are subject to change based on internal review of the PSMP initiatives and discussions with Staff. As the Company continues to implement and analyze the programs, including newly available data, it may be determined that new or refined metrics provide better measures of program effectiveness.

7. DEO will continue to identify savings and efficiency opportunities as the initiatives are fully implemented.

8. DEO would also note that it does propose one new initiative for consideration by the Staff and Commission for 2022: compliance with OAC 4901:1-16-04(J) (effective Aug. 5, 2021). Further detail regarding this proposal is included in the attached Programmatic Review. If this initiative is not objected to by Staff or is approved by the Commission, DEO intends to begin deferring incremental costs associated with this initiative in 2022.

WHEREFORE, DEO respectfully submits this annual report for Commission Staff's review, and requests a recommendation that all 2020 PSMP-related expenses be deferred.

Dated: September 1, 2021

Respectfully submitted,

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ATTORNEYS FOR THE EAST OHIO GAS
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Annual Report was served by electronic mail this 1st day of September 2021 to the following:

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/s/ Lucas A. Fykes
One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion Energy Ohio

Attachment A

[illegible]

Attachment B

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors
The East Ohio Gas Company
Cleveland, Ohio

RE: Public Utility Commission of Ohio Case No. 15-1712-GA-AAM

We have performed the procedures enumerated below to assist The East Ohio Gas Company d/b/a Dominion Energy Ohio (a wholly-owned subsidiary of Dominion Energy, Inc.) ("DEO", the "Company", or "you" or "your") and the Public Utilities Commission of Ohio (the "PUCO") with respect to the PUCO's evaluation of the Company's compliance with PUCO Case No. 15-1712-GA-AAM in conjunction with the balance of accumulated cost deferrals for the Pipeline Safety Management Program ("PSMP") for the period January 1, 2020 through December 31, 2020. The Company's management is responsible for the Company's compliance with these requirements.

DEO has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of the engagement, as described above. Additionally, Dominion Energy Inc. and the PUCO have agreed to and acknowledged that the procedures performed are appropriate for their purposes. Accordingly, this report may not be suitable for either the purpose of which this report has been requested or for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures that were performed and our findings are as follows:

1. Obtained from Company management the detail of the PSMP cost deferrals by month for the period from January 1, 2020 to December 31, 2020 and agreed the total deferrals to the Company's summary schedule to be filed with the PUCO as part of the PSMP annual report, and performed the following procedures:
 - a. Removed all prior year (cumulative cost deferrals through 2019) PSMP activity from current year totals. Agreed the remaining activity to the change in the 2020 PSMP cost deferrals by agreeing the detail obtained in Step 1 above to account 1242153 (PSMP Deferral) in the Company's general ledger and by adding the difference between the December PSMP deferral estimate and December PSMP deferral actual costs within account 1242153 with a difference of \$73.91. The Company informed us this difference was recorded in a subsequent month.
 - b. Agreed the beginning balance of the PSMP deferral summary schedule of deferrals by month, to the beginning balance of the 2020 PSMP deferral account 1242153, and the difference between the December 2019 PSMP deferral estimate and PSMP actual deferrals.

- c. Haphazardly selected 3 months included in the detail obtained in Step 1 above. For each month selected, haphazardly selected 5 individual cost line items from the activity detail (15 total selections) and agreed the cost included in the detail to supporting documentation for each selection.
 - i. For the 13 labor charges in our selections, we recalculated the total charges selected by multiplying the total hours charged by the employee to a PSMP-related WBS code by the employee's activity rate without exception. We agreed the total hours charged to the WBS and the employee's activity rate to the Company's payroll system and found them to be in agreement. We inspected the Company's records and determined that the selected employees were assigned to a PSMP-eligible position.
 - ii. For the 2 contractor service charges included in our selections, we agreed the selections to a third-party invoice by multiplying the hours charged by the service rate and found them to be in agreement.
 - iii. No vehicle expenses were included in the 15 haphazard selections made.
- 2. We obtained from Company management the monthly detail of the carrying charges included in the PSMP cost deferrals for the period from January 1, 2020 to December 31, 2020 and performed the following procedures:
 - a. Agreed the monthly detail of the carrying charges to the total carrying charges included in the detail obtained in Step 1 above and found them to be in agreement.
 - b. Haphazardly selected 3 months and recalculated the monthly carrying charges for the selected months without exception by multiplying the Company's average of the monthly beginning and ending balance from the PSMP Deferral Monthly Summary (obtained in Step 1) by the Commission approved three percent per annum rate without compounding.

We were engaged by the Company to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not, conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the Company's compliance with PUCO Case No. 15-1712-GA-AAM in conjunction with the balance of accumulated cost deferrals for the PSMP for the period January 1, 2020 through December 31, 2020. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Company and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Company, Dominion Energy, Inc., and the PUCO and is not intended to be, and should not be, used by anyone other than these specified parties.

DeBaitte & Touche LLP

August 30, 2021

Attachment C

Dominion Energy Ohio

2021 Pipeline Safety Management Program (PSMP)

Annual Report

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INTRODUCTION

Dominion Energy Ohio (DEO) continued to make significant strides in enhancing its Pipeline Safety Management Program (PSMP) during 2020. Even with the difficulties posed due to the COVID pandemic restrictions, DEO continued several key actions, which are discussed more fully below, to meet or exceed the Company's expectations.

DAMAGE PREVENTION INITIATIVES

DEO received approximately 4% less excavation tickets in 2020 as compared to 2019. This decrease was likely due to two factors. As reported in its last annual report, DEO reevaluated its OH811 grids in the 4th quarter of 2019 and as a result over 1,000 grids were eliminated and ticket reductions resulted. In addition, the COVID-19 pandemic likely had the effect of slowing excavation activity, resulting in lower ticket volume.

At the same time, DEO experienced a 15% decrease in excavation damages in 2020 as compared to 2019. Therefore, while one may have predicted that less one call tickets would result in less damages, DEO's damage reductions significantly outpaced ticket reductions. DEO believes that this reduction could be attributed to the following factors:

- The Damage Investigation Program is now fully staffed and has matured over the last two years since the team's creation. Resources now investigate all excavation damages. DEO believes that this is resulting in a more accurate assessment of total damages occurring on its system.
- DEO continues to leverage risk-modeling software to prevent excavation damages. Using predictive analytics to determine where damages are most likely to occur, DEO deploys resources to work with excavators in order to encourage safe digging and prevent damages.

Metrics:

Metrics	2016	2017	2018	2019	2020
Damages per one thousand tickets	3.28	2.99	3.04	3.50	3.10

Unconventional Locate Expert Program

In 2020, DEO continued its work with USIC/Reconn to improve locating accuracy for service lines and to reduce excavation damages. DEO implemented a marker ball installation program for the Unconventional Locate Program. When an unlocatable service line is located, in addition to updating Service Line Data Sheets, marker balls are installed which will then allow the service line to be located by the production locators, DEO's contracted resources who locate the standard one call tickets that are received.

In 2020, the percentage of successfully located service lines increased and damages on service lines that were assessed through the program were reduced. In 2021, DEO will continue the program to locate service lines and to complete service line data sheets. Both of these activities will improve records and increase our ability to accurately locate service lines.

Metrics:

Metrics	2016	2017	2018	2019	2020
Tickets sent to unconventional crews		707	2,330	2,320	1,828
Service lines assessed through unconventional program		503	1,837	1,962	1,536
Service lines successfully located		405	1,569	1,561	1,322
Percentage of successfully located services		80.5%	85.4%	79.6%	86.1%
High profile services located		242	1,262	1,050	696
Number of Service Line Data Sheet (SLD) opportunities		319	1,315	1,227	1,125
Number of SLDs completed		255	1,178	1,034	864
SLD completion rate		79.9%	89.6%	84.3%	76.8%
Damages on assessed service lines		0	6	4	2

Enhanced Excavation Monitoring Program

In 2020, DEO continued to use the Ticket Risk Assessment (TRA) program with TRA technicians from USIC/RECON fully dedicated to the program. DEO emphasized quality interventions over the quantity of ticket interventions by TRA technicians in 2020, resulting in a lower overall number and percentage of tickets being monitored by a TRA technician. A focus on quality interventions, where the TRA technician spends more time with each excavator discussing safe digging practices, appears to be producing the desired result. The damage ratio on tickets worked by a TRA technician decreased in 2020 as compared to 2019.

DEO's damage investigation team continued to provide key information to inform the predictive analytical model and DEO's allocation of resources to address higher damage areas also contributed to the decrease of DEO's overall damage rate from 3.50 in 2019 to 3.10 in 2020.

Metrics:

Metrics	2016	2017	2018	2019	2020
Tickets assessed through risk algorithm		165,607	249,861	293,271	282,642
Percentage of tickets with risk probability score ≥ 5.0		10.8%	10.0%	10.0%	10.0%
Tickets monitored by TRA technician		5,892	14,069	16,969	11,398
Percentage of tickets with risk probability score ≥ 5.0 monitored by TRA technician		29.7%	49.6%	57.6%	39.9%
Total damages on tickets with risk score ≥ 5.0		171	337	355	255
Total number of damages within areas worked by TRA technician		51	149	144	100
Damage ratio on tickets with a risk score ≥ 5.0		9.60	11.95	12.04	8.92
Damage ratio w/out utilizing a TRA technician		10.07	13.23	12.23	9.02

Damage ratio w/ utilization of TRA technician		8.66	10.64	8.49	4.30
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Damage Investigation Program

In 2020, DEO continued its efforts with the Damage Investigation Program. DEO fully implemented its Damage Prevention database, which provides near real time data on damaged facilities. Through this program, DEO continues to investigate all excavations damages to its facilities and as stated above, uses data from investigations to inform the predictive analytical model.

Metrics:

Metrics	2016	2017	2018	2019	2020
Number of damages			530	1,171	992
Investigations completed			530	1,171	992
Investigations completed w/in 30 days			530	1,171	992
Percentage of investigations completed w/in 30 days			100%	100%	100%
Number of field investigations conducted			75	277	630

Enhanced Leak Survey Program

DEO continued its Enhanced Leak Survey Program by leak surveying high-pressure distribution lines located outside of business districts during 2020. Results of the leak surveys have been analyzed and as shown in the metrics below, no Grade 1 leaks were discovered via this program throughout its duration. For this reason, DEO has determined that PSMP resources would be more effectively directed toward other PSMP initiatives to manage risk and therefore, as initially reported during the March biannual meeting with PUCO Staff, DEO will discontinue this program for 2021.

Metrics:

Metrics	2016	2017	2018	2019	2020
Miles of HP distribution pipelines leak surveyed		377.1	411.8	427.8	514.0
Number of Grade 1 leaks discovered		0	0	0	0
Number of leaks confirmed on HP distribution		31	17	37	27

Enhanced Excavator Communication and Training

In 2020, DEO continued the programs associated with the Enhanced Excavator Communication and Training initiative. While the major league baseball season was abbreviated in duration and stadium capacity was limited due to the COVID-19 pandemic, DEO's partnership with the Cleveland Indians continues to be an important outreach vehicle for the "Call Before You Dig" message, particularly with local Northeast Ohio audiences.

This program and other outreach initiatives are detailed below:

Cleveland Indians – 8-1-1 “Call Before You Dig” campaign

Live Radio Read Script: *"Dominion Energy wants to remind you, whether you are an individual or contractor, state law requires you to "Call 8-1-1 Before You Dig" to have underground utilities marked. It's simple and FREE, dial 8-1-1 at least two business days prior to digging for your safety!"*



- Cleveland Indians Radio Network:
 - 20,000 listeners during any 15-minute increment of in-game broadcast
 - Aired on WTAM 1100 and WMMS 100.7 simulcast and across the entire Indians Radio Network (18 AM stations and 9 FM stations)
 - #1 rated TV audience across MLB in 2020 with over 90,000 households viewing per game
 - Games streamed over iHeart Radio over 5.5 million times.
 - Over 8,000 streams per game over the MLB At Bat App.

Paradigm Collaborative Program – DEO continued its participation in the Paradigm Collaborative Program, which assists pipeline operators to increase public awareness of pipeline safety through consistent messaging specifically targeted to individual stakeholder groups.

- Stakeholder groups include: Affected Public, Emergency Officials, Excavators, Public Officials, Farmers and Schools.
- Each communication includes a stakeholder-specific brochure, an operator profile, and a business reply survey to measure understandability of the message, outreach, and behavior.
- Annual Paradigm Collaborative Program Effectiveness Measures

	Paradigm Collaborative Program Effectiveness Measures																							
Targeted Audience Questions	Affected Public				Emergency Officials				Excavators				Public Officials				Farmers				Schools			
	2017	2018	2019	2020	2017	2018	2019	2020	2017	2018	2019	2020	2017	2018	2019	2020	2017	2018	2019	2020	2017	2018	2019	2020
Within the past 2 years, do you recall receiving information from a pipeline company?	30%	46%	56%	59%	82%	85%	100%	96%	80%	88%	85%	79%	72%	76%	84%	81%	79%	85%	90%	91%	35%	53%	71%	59%
Do you know how to recognize a pipeline right-of-way?	73%	75%	75%	79%	90%	88%	100%	97%	94%	93%	96%	94%	77%	84%	94%	87%	92%	97%	93%	97%	77%	81%	100%	100%
Do you know how to recognize a pipeline leak?	68%	71%	70%	73%	91%	89%	100%	96%	92%	92%	92%	89%	85%	82%	92%	84%	90%	88%	90%	89%	73%	72%	86%	85%
Have you ever heard of 811?	52%	63%	64%	69%					95%	94%	98%	96%	92%	90%	98%	96%	74%	85%	90%	89%	81%	84%	100%	93%
If you were planning on digging, which of the following actions would you be likely to take? (Call 811)	70%	72%	79%	80%					86%	96%	95%	97%	88%	94%	100%	98%	74%	82%	97%	93%	73%	83%	100%	89%
What will you do if you see suspicious activity on or near a pipeline right-of-way? (Call 911, Pipeline Company)	91%	91%	91%	93%					98%	95%	99%	96%	99%	96%	94%	92%	95%	91%	87%	94%	95%	97%	100%	100%
What would you do if the event of a pipeline emergency? (Call 911, Pipeline Company)	95%	96%	97%	97%					100%	95%	100%	99%					100%	91%	100%	97%	98%	97%	100%	100%



DEO continued its participation with this organization, whose mission is to provide meaningful information and helpful resources related to damage prevention and safety that not only captures the attention of excavators, but all stakeholders involved in the damage prevention process, as well as the general public.

NEI 2020 Media Outreach Successes:

Print Media

Newspaper – Print and Online

- Produced articles on Cross Bore awareness
- 1,937 Outlets in English and Spanish
- Total Impressions: 203 million

Brochures

- Continued the deployment of the “**Protect Them & Yourself**” state-specific API RP 1162 compliant brochure and mailed to over 200,000 excavators in 18 states in English and Spanish.

Electronic Media



Produced a series of “Call Before You Dig” ads featuring Mike Rowe as the spokesperson promoting the importance of safe excavating practices. Ads were run in:

Broadcast & Cable Television

- 168 markets throughout the United States
- 784 television networks
- 21,756 advertisements run
- Estimated impressions: 136 million

Broadcast Radio

- 154 United States markets
- 483 stations
- 72,032 advertisements run
- Estimated impressions: 392 million

Gas Station Television (GSTV)

- Target: 133 gas stations in areas identified as likely serving people in landscaping services
- Timeframe: 4 weeks during October and November

Electronic Banners on Webpages and Cell Phone Apps

- Ads rotated monthly with specific themes
- Total impressions: 7.5 million



Facebook

- 25 educational ads produced and deployed
- Total impressions: 2 million

Billboards

- 104 locations throughout the United States
- 8 months of coverage
- Total impressions: 62 million

Safe Excavator App for iPhone and Android systems

- Identifies state-specific requirements for excavation in an easy-to-understand format
- Connects electronically to make a one call request
- Lists how to contact state one call centers
- Provides supporting operators emergency and general contact information
- API RP 1162 required messages on:
 - ☐ Leak recognition
 - ☐ Release response
 - ☐ Reporting damage

Safe Excavator Website (www.safeexcavator.com)

- Contains state laws by topic
- Educational videos
- Safe digging checklist

Enhanced Monitoring – Low Pressure Regulating Stations

In 2020, DEO assessed and monitored excavation activity near its low pressure (LP) regulating stations. Assessment of stations is being completed to affirm the correct location and documentation of existing control lines through records review and field verification. Where documentation and records are insufficient, DEO is exposing the control lines, updating the records, and installing locator/marketing balls. As of December 2020, DEO has assessed 37% of low pressure regulating stations and will continue assessments until all are completed. Instances where buried control lines do not terminate inside a regulating station building or inside DEO's fence will be monitored when excavation activity is in the immediate vicinity. All LP regulating stations will be monitored until the assessment is complete and DEO verifies that the control lines are not at risk.

DEO has also invested in a database that tracks 811 tickets in real time that are near low pressure regulating stations in order to mitigate more effectively the risk of damage during excavation.

Metrics: As this program matures and as assessments are completed, these metrics will be evaluated and refined or redefined as needed.

Metrics	2016	2017	2018	2019	2020
Total number of LP stations assessed					430
Percentage of LP stations assessed					37%
Number of OH811 tickets within a 100' proximity to LP stations					4353
Number of excavation damages on control lines at LP stations					0

ADVANCED WORKFORCE TRAINING INITIATIVE

DEO continued implementation of its comprehensive workforce training strategy in partnership with Mosaic in 2020. Below are the milestones reached in 2020:

- Instructor Development
 - Continued implementation of the comprehensive Instructor Development Plan, including:
 - Training from Friesen, Kaye and Associates on facilitation skills, classroom coaching skills and adult learning methodologies.
- Training Development Production Process
 - Continued to adhere to Style Guide and development processes to document training materials for new curricula.
- Technology
 - Completed a technology sustainment plan
- Curriculum Development
 - Conducted SME interviews and completed C&M (Construction and Maintenance), Inspection and Design job role analyses
 - Finalized C&M and Inspection task analyses.
 - Completed C&M and Inspection Learning Solutions proposals.
 - Completed approximately 10% of needed curriculum development for C&M and Inspection and Design roles.
 - Completed first pilot class for C&M curriculum.
 - Additional train the trainer and pilots are scheduled throughout the rest of the year.
- Continue to implement new system for Operator Qualification.

Metrics:

Note: In prior years, the metrics below were reported separately for each particular job role/grouping. As the AWTI program continues to mature, prior-developed training modules and job aids will be utilized in part and further specialized for additional roles. Therefore, going forward, the development of training hours and job aids will be reported in total rather than by job role. Likewise, the average score of knowledge assessments represents the combined average score of all DEO employees who have been assessed.

Metrics		2016	2017	2018	2019	2020
Total number of training hours developed			179	328	80	16
Total number of job aids created			139	315	83	32
Number of employees completing training courses				6	60	66
Average score of knowledge assessments	Overall			94%	92%	89%

Metrics		2017	2018	2019	2020
Instructional Effectiveness	Surveys completed in Survey Monkey	314	289	361	37
	Respondents <i>Agree</i> or <i>Strongly Agree</i> that content supports their learning experience		89%	84%	94%
	Respondents <i>Agree</i> or <i>Strongly Agree</i> that instructor was knowledgeable		98%	89%	100%
Technology Tools	Number of employees utilizing the electronic Help & Support tools	8	38	38	All DEO employees have access
Training Facility Completion	Training Town	50%	80%	90%	90%
	Flow Labs	80%	90%	95%	95%

ASSET DATA COLLECTION

In 2020, DEO made significant progress on three primary components of the Asset Data Collection initiative: Asset Data Strategy, Data Governance and MAOP Validation.

Asset Data Strategy (ADS)

The ADS team completed projects in these areas:

- GIS projects:

- Completed data mapping of DEO GIS assets from GE Smallworld to the Esri ArcGIS for use with Esri's internal web-based GIS service, Portal. Field users now have mobile GIS view access in the field and have the ability to customize views, including or excluding information as desired. Esri Portal also expands asset data analytical capabilities in the office and has enabled the quick development of data collection apps, including one used to track pipeline construction jobs in-service.
- Completed landbase and conflation project to improve positional accuracy of GIS assets and replace existing GIS landbase with a commercially available landbase.
- Construction Mobility:
 - Completed use cases and selected GPS & Barcode equipment to be used in pilot. The project is designed to capture asset data in the field electronically for tracking and traceability as well as GPS-based location information.
 - Pilot project planned for distribution plastic mainline by Q4 2021.
- Inspection Monitoring System (IMS) Migration:
 - Implemented an application to provide due dates and a data repository for odorant reads and odorometer calibrations.
 - Continued work on a multi-year project to migrate legacy maintenance and inspection system (IMS) to enterprise solutions. The current system contains DOT and non-DOT inspections, most notably critical valve inspections. Anticipated full deployment for asset-related inspections is planned for the end of 2021.

Metrics: Metrics identified for Asset Data Strategy are shown below. DEO continually evaluates its processes for the reporting of metrics to ensure that the most comprehensive data set is used in order to show progress most accurately. In that regard, starting with reporting for January 2021, the process to calculate the "Average Days to Final Update" will be revised. Further detail regarding the new calculation process and a restatement of historical data will be provided when 2021 metrics are shared.

Metrics		2016	2017	2018	2019	2020
Average days to final update of mapping in GIS after construction are complete		71	79	62	89	75
Percentage of new construction facilities mapped to the GIS with complete data		94.9%	99.6%	99.4%	99.2%	99.7%
DOT Report	Miles of main with unknown decade of installation	94.40	88.93	83.06	79.95	78.52
	Number of services with unknown material	462,858	451,137	439,631	427,904	416,691
	Number of services with unknown size	676,992	665,729	655,475	644,706	633,297

	Number of services with unknown decade of installation	607,700	602,719	595,506	583,790	572,830
	Miles of transmission with unknown decade of installation	0.37	0.36	0.32	0.02	0.00
	Miles of Gathering Type B with unknown decade of installation	10.18	10.18	9.91	9.92	9.92

Asset Data Governance

In 2020, DEO completed installation of its data governance software (Informatica Suite) and migrated and enriched data in the software. Software training was also completed for subject matter experts and an extensive data catalog was populated.

In 2021, DEO will formalize its Data Governance Council to address program prioritization/updates and will establish a Data Governance Working Group to regularly review and handle issues relating to data quality.

Metrics: As seen in the metrics below, the initial creation of the data catalog was completed in 2019. In 2020, the focus shifted to maintenance of activities, datasets, and fields that had been collected, cataloged, or identified. During 2020, the data governance team also focused on annual reviews that will ensure data quality moving forward.

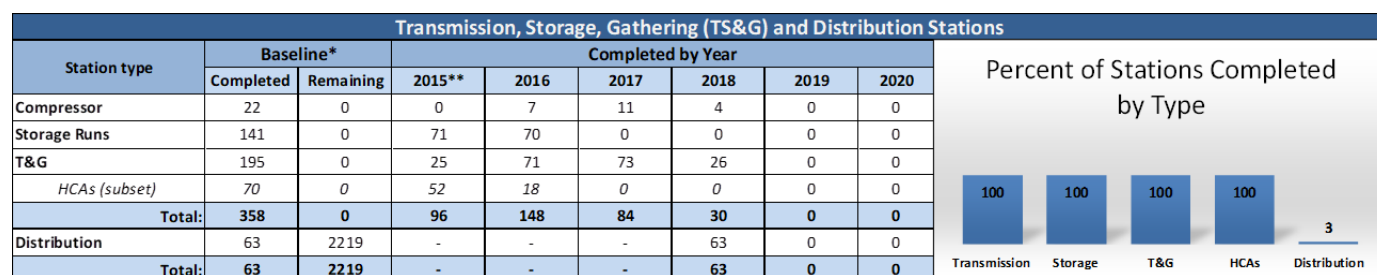
Metrics		2016	2017	2018	2019	2020
Asset Data Catalog	Number of activities collected			306	2	
	Percentage of activities cataloged			99%	100%	
	Number of activities maintained					295
	Number of datasets collected			857	19	
	Percentage of datasets cataloged			98%	100%	
	Number of datasets maintained					940
	Total number of fields identified			16,105	640	
	Number of fields defined			6,764	8,838	
	Total number of fields maintained					16,052
	Percentage complete			58%	100%	
	Datasets/Forms reviewed annually					86
	Data quality rules built					0

MAOP Validation

Another focus under the Asset Data Collection Initiative is the continued review of MAOP data to ensure it is traceable, verifiable and complete (TVC) for all Transmission, Storage, Gathering and Distribution stations, as well as Transmission and Storage pipeline systems.

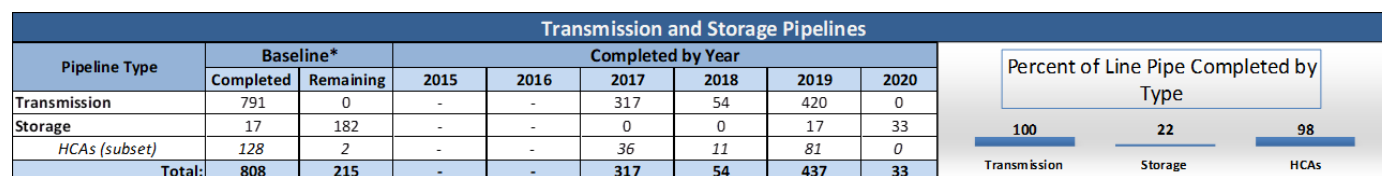
In 2019, DEO completed review of MAOP data for all Transmission pipeline systems and began TVC validation of remaining Storage pipelines. As of the end of 2020, MAOP validation was completed for 22% of Storage pipelines.

Metrics:



*Baseline is the total number of stations identified for review: 358 TS&G stations and 2282 Distribution stations

**Validation of 2015 stations predated effective date of deferral authority



*Baseline is the total number of pipeline miles identified for review: 1,023 miles

QUALITY ASSURANCE

DEO Quality Management team members continue to support specific operating territories in order to increase pipeline safety presence, improve consistent communication of pipeline safety topics, and help ensure commitments to the PUCO are completed or in progress. Challenges related to the COVID-19 pandemic restricted the team's ability to complete internal audits for all operating shops and to complete issue management audits in 2020, as seen in the metrics below.

In 2021, DEO is reviewing and modernizing its approach to quality management. The team will prioritize its focus on areas most in need of QA/QC review and plans to use Survey 123 technology to track and communicate audit results in order to identify continuous improvements that should be considered internally.

Metrics: When assessing documentation, a score of satisfactory was given to documentation that was deemed complete and accurate. Any portion of the documentation or any single document that failed

to meet the aforementioned criteria resulted in a score of unsatisfactory. A score of unsatisfactory does not mean that the underlying activities were improperly performed or necessarily indicate that the documentation is out of compliance but that the documentation is not complete and/or accurate for the purposes of this assessment.

As the program matures metrics will be reviewed, refined, and redefined to align with the growth of the program.

Metrics:

Metrics		2016	2017	2018	2019	2020
Internal Audit	Number of internal audits completed			7	14	3
	Percentage of operating shops audited			50%	100%	21%
Construction Oversight Program	Number of construction packets audited			54	100	111
	Number of processes reviewed			22	30	32
	Percentage of documentation deemed complete and accurate			72.8%	79.7%	90.3%
Issue Management Assessments	Number of assessments completed			4	2	0
	Total number of records reviewed			957	167	NA
	Field audits conducted			110	167	NA
	Percentage of documentation deemed complete and accurate			94.1%	99.4%	NA

UNDERGROUND STORAGE INTEGRITY PROGRAM

In 2020, DEO completed casing inspection logs on 82 wells, of which 78 were baseline logs bringing the baseline completion to 81%. Seventy-nine wellhead valves were replaced, which are comprised of master gates, side gates, and flow gates. Monthly wellsite inspections on over 800 wells were completed for 2020. A total of 2,531 individual wellhead valve inspections were completed in 2020. A review of risk input variables was conducted, and the 2020 risk ranking was completed.

The 2019 Annual DOT report was completed and filed with PHMSA, and PHMSA personnel conducted a construction inspection in June and July 2020. DEO also permanently plugged four wells to address integrity issues.

DEO also implemented improved procedures for well construction and workover activities including:

- Well Construction Checklist
- Well Plug and Abandon Checklist
- Cement Design Evaluation and Worksheet
- Cement Calculation Guidelines
- Tubular Design Evaluation and Worksheet
- Casing Handling Procedure
- Completion and Stimulation Procedure and Worksheet
- Mechanical Integrity Testing Guidelines
- Mechanical Integrity Testing Form
- Well Work Assessment Form

Metrics: Continuing improvements in Dominion Energy’s risk model resulted in additional refinements, which were included for previous years by re-generating the results. The results of the refined model are reflected for 2017, 2018 and 2019 in the tables and graphs below.

DEO Risk Ranking					
Metrics	2016	2017	2018	2019	2020
Normalized Risk from Design Score		3.25	2.84	2.19	2.23
Normalized Risk from Integrity Score		9.85	9.00	8.73	8.22
Normalized Risk from O&M Score		0.78	0.46	0.44	0.46
Normalized Risk from Well Intervention Score		0.22	0.22	0.25	0.24
Normalized Risk from Well: Third Party Score		0.05	0.05	0.05	0.05
Normalized Risk from Surface: Third Party Score		1.42	1.11	1.16	1.20
Normalized Risk from Weather and Outside Forces Score		0.39	0.38	0.38	0.39
Normalized Risk from Reservoir: Third Party Score		0.44	0.24	0.44	0.44
Normalized Risk from Geologic Uncertainty Score		0.18	0.14	0.19	0.19
Normalized Risk from Reservoir Fluids Score		0.14	0.14	0.14	0.14

Metrics	2016	2017	2018	2019	2020
Percentage of Baseline Casing Inspection Logs Completed		53%	62%	71%	81%
Casing Inspection Logs Completed			76	81	82
Wellhead Valve Inspections Completed			2,497	2,547	2,531
Wellhead Valves Replaced			45	54	79
Plugged & Abandoned Well Inspections Completed			229	492	244

GATHERING RIGHTS OF WAY MAINTENANCE

In 2020, DEO partnered with its vendor to complete scheduled clearing in the Type B Gathering ROW in two New Philadelphia project areas. As in previous project areas, the vendor performed line locating, planning of vegetation work, customer notifications and installed line markers. Additionally, line exposures and encroachments were identified. As a continuous improvement and cost-savings measure for this program, DEO's land department performed easement research for the northern sections of the 2020 projects, while the vendor completed this work for the southern portions of the project. Dominion will continue to leverage this cost savings and efficiency measure when possible for easement research in future years of the program.

Previously cleared project areas were also reviewed in 2020 and herbicide applications were made to ensure continued maintenance of the recently cleared areas. The goal of the vegetation management plan is to at minimum greatly reduce the frequency in which the rights-of-way need mowed, encourage growth of low native grasses, and prevent the growth of the woody species.

Metrics:

Metrics	2016	2017	2018	2019	2020
Cumulative percentage of Type B Gathering lines cleared and/or assessed		2.2%	16.1%	42.2%	58.0%
Miles of Type B Gathering lines cleared and/or assessed		13.5	84.5	158.5	95.6
Miles of Type B Gathering lines located		21	77	165	100
Number of new line markers or replacement stickers installed		420	155	617	171
Number of encroachments identified and reported			29	9	30
Number of exposures identified and reported			7	17	14

SERVICE OFF SERVICE

In 2020, a dedicated project team was established, and a new prioritization and assessment methodology was initiated to address Service Off Service situations in an accelerated manner. The team combined known taps into "campuses," a process using a combination of GIS, DEO's customer database, and Google Earth to create logical groups of 20-30 taps (typically) within the same geographical area. The team also created field verification packets which will be used to verify the configuration of sites in the field that have been researched using internal company records and systems. By the end of 2020, approximately 20% of higher potential sites were assessed through this stage of the process.

Throughout 2020, the SOS team continued to add and train resources. The team is continually assessing its progress using this methodology and making efficiency improvement to the process. The team

continually recalibrates the process to ensure that it is considering the right data and using the correct factors to accurately identify SOS situations in the field.

In parallel with the accelerated assessment process, the team is starting remediation efforts as well. PSMP funding will be used for remediation efforts that may include surveys, mapping, painting, and addressing coating issues on pipeline components.

Metrics: As the program matures, the metrics below will be evaluated and refined or redefined as needed.

Metrics	2016	2017	2018	2019	2020
Number of original customer accounts to be reviewed in accelerated assessment					496,038
Number of customer accounts assessed					12,576
Number of SOS situations confirmed					233
Percentage of confirmed SOS situations mapped in GIS					49%

NEW INITIATIVES IN 2021

As discussed with Staff on August 28, 2020, as part of the biannual meeting and formalized in the 2020 Annual Report filed on September 1, 2020, DEO proposed inclusion of two new initiatives to the PSMP in 2021: the Mega Rule initiative, an initiative to assess and comply with PHMSA's ongoing rule-making, part one of which is entitled "Safety of Gas Transmission Lines: MAOP Reconfirmation, Expansion of Assessments, and Other Related Amendments," and the HP Distribution Farm Tap initiative, a program to accelerate the assessment and remediation of certain taps. In its Report and Recommendation filed on November 18, 2020, Staff did not oppose inclusion of the Mega Rule initiative in DEO's PSMP but recommended that the HP Distribution Farm Tap initiative not be included in the PSMP.

On December 16, 2020, DEO filed its response to Staff's recommendation and did not oppose Staff's recommendation regarding HP Distribution Farm Taps at that time. On the basis of Staff's recommendation and in accordance with the Commission-approved terms regarding the inclusion of new initiatives in the PSMP, DEO continued to assess a program related to compliance with the Mega Rule in 2020 and may begin deferring related expenses in Q4 2021.

Details of the Mega Rule initiative are provided below:

Mega Rule

Part 1 of the Mega Rule was published on October 1, 2019, with effective dates in 2020 and 2021. Beginning in 2019, and extending into the 2020 calendar year, DEO's efforts were focused on developing processes, procedures, and standards to support the regulatory changes. This work was completed by existing employees and no incremental resources were used. As the plans were still under development,

no assessments outside of high consequence areas (HCAs) or maximum allowable operating pressure (MAOP) reconfirmation projects were completed in 2020.

The first half of 2021 was focused on developing additional processes, procedures, and standards, and finalizing plans for assessments outside of HCAs and MAOP reconfirmation. The MAOP reconfirmation work scheduled in 2021 can be capitalized per guidance from PHMSA. DEO expects that work for assessments outside of HCAs that could be covered under PSMP will ramp up in 2022. Accordingly, while DEO may begin deferring related expenses in Q4 2021, such expenses are anticipated to be deferred beginning in 2022.

Metrics: As explained, DEO is still in the early stages of developing this initiative and is still in the process of evaluating appropriate performance metrics. As the program matures and as additional parts of the Mega Rule are issued by PHMSA, additional metrics are expected to be added and will be reported and monitored accordingly.

PROPOSED INITIATIVES BEGINNING 2022

DEO proposes the inclusion of one new initiative associated with compliance with a new requirement of Ohio Administrative Code (OAC) 4901:1-16. Made effective on August 5, 2021, OAC 4901:1-16-04 (J) requires operators to have and follow a written plan for tracking and abandoning inactive service lines in accordance with 49 C.F.R. 192.727. The plan is required to be complete and in effect by August 5, 2023.

DEO is assessing the impact of this rule change on its operations and is determining whether incremental costs associated with compliance would be eligible for inclusion in the PSMP.

DEO will continue to assess the new rule and develop plans for compliance. Additional detail regarding assessment and planning efforts will be shared with Staff at the next biannual PSMP meeting in Q1 2022. For this initiative, only incremental costs would be included, and total PSMP deferrals would not exceed the \$15 million cap.

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Summary: Report 2021 PSMP Annual Report electronically filed by Christopher T. Kennedy
on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio