### 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 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 2010 through November 2011, and which Columbia proposes to defer, were \$3,137,961.68. These costs are comprised of expenses incurred in the continued remediation of sites in Marion and Bellevue, and remediation of sites in Toledo, Freemont and Fostoria. The projects and costs are described in the following attachments:

> Attachment 1 – Marion project description Attachment 2 – Marion cost detail Attachment 3 – Bellevue project description Attachment 4 – Bellevue cost detail Attachment 5 – Toledo (structure) project description Attachment 6 – Toledo (structure) cost detail

Attachment 7 – Toledo (Swan Creek) project description Attachment 8 – Toledo (Swan Creek) cost detail Attachment 9 – Fremont project description Attachment 10 – Fremont cost detail Attachment 11 – Fostoria project description Attachment 12 – Fostoria cost detail

In addition, Columbia has included in this report, as Attachment 13, a schedule showing the amounts previously deferred for all projects, and the amounts deferred during the last 12 calendar months.

Respectfully Submitted,

<u>/s/ Stephen B. Seiple</u> Stephen B. Seiple (Counsel of Record)

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

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Annual Report of Columbia Gas of Ohio, Inc. was served upon parties of record by regular U.S. Mail this 6<sup>th</sup> day of December 2011.

<u>/s/ Stephen B. Seiple</u> By: Stephen B. Seiple Attorney for Columbia Gas of Ohio, Inc.

### SERVICE LIST

Larry S. Sauer Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, OH 43215-3485

### Remediation - Marion, Ohio

Description: This was a former 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.

Phase I Assessment: 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 OEPA. By March 2006 access to the 18 properties for a Phase I Property Assessment, following OEPA, 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 OEPA 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 MGP-related compounds, including benzene, naphthalene, and polyaromatic hydrocarbons were detected in soils above OEPA 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. 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 OEPA 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 will result 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 most recent twelve-month period 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, and remediation was substantially completed by June. 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 offsite. 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. Additional activities required under Ohio's Voluntary Action Program ("VAP") were also completed, including data evaluation, groundwater classification, multiple chemical adjustments on site data, etc. A meeting with the Ohio EPA, under the VAP's technical assistance program was completed in November. Responses from the EPA on questions raised by Columbia during this meeting are pending.

<u>Total Project Costs to Date</u>: Total incremental costs incurred by Columbia during the period January 2008 through November 2011, exclusive of the \$25,000 to be funded by Columbia, were \$739,243.49. This amount is comprised of \$300,455.16 previously deferred and \$438,788.33 for work performed during the period December 2010 through November 2011. Attachment 2 sets forth a detailed breakdown of these expenses incurred during the period December 2010 through November 2011.

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#### Columbia Gas of Ohio, Inc. Summary of Marion Environmental Expense December 2010 - November 2011

Attach	ment	2
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Month	CE	ACTIV	TRAN CNTR	Amount	Description
10-Dec	3C23	7505	1732	1,150.00	Hosting Costs for Web Based Data Mgt System
10-Dec	3C23	7505	1732		Remedial design and project management
10-Dec	3C23	7505	1732		Remedial design documentation
Total				9,668.80	
11-Jan	3C23	7505	1732	462.19	Property management
11-Jan	3C23	7505	1732	4,186.97	Remedial design documentation
11-Jan	3C23	7505	1732	3,000.00	Risk management plan preparation
Total				7,649.16	
11-Feb	3C23	7505	1732	10,944.50	General risk work
11-Feb	3C23	7505	1732	1,763.96	Legal notice
11-Feb	3C23	7505	1732	7,015.83	Remedial design documentation
11-Feb	3C23	7505	1732	393.45	Site and property management
Total				20,117.74	
11-Mar	3C23	7505	1732	2,077.75	General risk work
11-Mar	3C23	7505	1732	40,914.02	Oversight/field activities and sampling
Total				42,991.77	
11-Apr	3C23	7505	1732	4,571.99	Remedial design documentation
11-Apr	3B60	7505	1732		Environmental testing
Total				4,628.24	
11-May	3C23	7505	1732	120,073.83	Oversight/field activities and sampling
11- <b>M</b> ay	3C23	7505	1732	1,454.04	Remedial design documentation
Total				121,527.87	
11-Jun	3C23	7505	1732	53,641.84	Oversight/field activities and sampling
Total				53,641.84	
11-Jul	3C23	7505	1732	862.02	Technical assistance from Ohio EPA
11-Jul	3C23	7505	1732	37,227.81	Oversight/field activities and sampling

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#### Columbia Gas of Ohio, Inc. Summary of Marion Environmental Expense December 2010 - November 2011

Attachment 2

11-Aug 3C23 7505 1732 27,322.10 Excavation and dewatering 11-Aug 3C23 7505 1732 31,190.07 Excavation and dewatering 11-Aug 3C23 7505 1732 10,125.14 Oversight/field activities and sampling 11-Aug 3C23 7505 1732 59.97 Remedial design documentation Total 68,697.28 1732 11-Sep 3C23 7505 15,205.06 Oversight/field activities and sampling Total 15,205.06 11-Nov 3C23 7505 1732 6,345.00 11-Nov 3C23 7505 1732 19,626.09 11-Nov 3C23 15,530.39 7505 1732 11-Nov 3C23 7505 1732 10,079.81 11-Nov 3C23 7505 1732 4,989.45 Total 56,570.74 Total 438,788.33

### Bellevue, Ohio Manufactured Gas Plant

<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 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>: Between May and August 2011, a Phase II Site Investigation was completed which involved test pitting, soil borings, installation of groundwater monitoring wells and soil vapor sampling. The results of this investigation are presented in a Final VAP Phase II Report, and indicate relatively minor impacts. In the fourth quarter of 2011, a site specific Human Health Risk Assessment ("HHRA") will be completed to determine if further actions are necessary. Should further actions be needed, in early 2012, a Corrective Action Plan will be completed and submitted, along with the Phase II SI and HHRA, to the Ohio EPA's VAP Technical Assistance group for review. Any future remedial efforts would likely take place in 2012.

<u>Total Project Costs to Date:</u> Total incremental costs incurred by Columbia during the period July 2009 through November 2011, exclusive of the \$25,000 to be funded by Columbia, were \$193,610.75. This amount is comprised of \$18,971.29 previously deferred for the period November 2008 through November 2010 and

\$174,639.46 for work performed during the period December 2010 through November 2011. Attachment 4 sets forth a detailed description of these expenses during the period December 2010 through November 2011.

#### Columbia Gas of Ohio, Inc. Summary of Bellevue Envrionmental Expenses December 2010 - November 2011

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	Month	CE	ACTIV	RAN CNTI	Amount	Description
	10-Dec	3C23	7503	1054	266.50	Community Relations Activities
Total					266.50	
	11-Jan	3C23	7503	1054	4,883.91	Community Relations Activities
	11-Jan	3C23	7503	1054	2,640.00	Environmental Data Management fee
Total					7,523.91	
	11-Feb	3C23	7503	1054	2,931.55	Community Relations Activities
Total					2,931.55	
	11-Mar 11-Mar	3C23 3C23	7503 7503	1054 1.054		Comm. Rel. Act. & Phase I Property Assess. Access agreement
Total	TT-MO	3023	7505	1004	7,894.04	Access agreement
Total			75.00	1071	·	
	11-Apr	3C23	7503	1054		Access agreement
Total					840.00	
	11-May	3C23	7503	1054	533.00	Community Relations Activities
Total					533.00	
	11-Jun 11-Jun	3C23 3C23	7503 7503	1054 1054		Community Relations Activities and Phase II Property Assessment Community Relations Activities
	11-Jun	3C23	7503	1054		Community Relations Activities and Phase II Property Assessment
Total					52,811.95	
	11-Jul	3B60	7503	1054		Environmental testing
	11-Jul 11-Jul	3B60	7503	1054		Environmental testing
	11-Jul	3B60 3B60	7503 7503	1054 1054		Environmental testing Environmental testing
	11-Jul	3B60	7503	1054		Environmental testing
	11-Jul	3C23	7503	1054		Community Relations Activities and Phase II Property Assessment
Total					55,716.73	
	11-Aug	3B60	7503	1054	1,175.00	Environmental testing
	11-Aug	3B60	7503	1054		Environmental testing
	11-Aug	3C23	7503	1054		Environmental testing
	11-Aug	3C23	7503	1054	9,500.00	Phase II Property Assessment
Total					13,253.00	
	11-Sep	3B60	7503	1054		Environmental testing
	11-Sep	3C23	7503	1054	9,494.69	Phase II Property Assessment
Total					9,559.69	
	11-Oct	3C23	7503	1054	12,824.38	

### Columbia Gas of Ohio, Inc. Summary of Bellevue Envrionmental Expenses December 2010 - November 2011

Total					12,824.38			
	11-Nov	3C23	7503	1054	3,920.83	Phase II Porpety Assessment		
	11-Nov	3C23	7503	1054	6,563.88	Phase II Porpety Assessment		
Total					10,484.71			
Total Decem	ber - Nove	mber 201 <b>1</b>			174,639.46			

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### Toledo Land and Structure - Manufactured Gas Plant

<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. This sale resulted in the reclassification of all environmental remediation costs incurred on and after January 1, 2008, from capital to operation and maintenance expenses. The site is in the process of being remediated in accordance with Ohio EPA's Voluntary Action Program ("VAP") regulations by the new Property Owner, River Road Redevelopment II, 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.

Columbia intended to remediate the land portion of the MGP under the VAP; therefore, Columbia conducted many site investigations prior to sale of the property. Columbia relocated all its employees at the property to new offices mid-2010 in order to complete the environmental investigations. Columbia subsequently partnered with R3II and the City of Toledo to pursue a Clean Ohio Revitalization Fund ("CORF") grant. The CORF application was submitted to Ohio EPA and Ohio Department of Development on July 23, 2010. Notice of a CORF grant award of \$3,000,000 was announced in November 2010. Columbia sold the property in March 2011 to R3II under an agreement that involves the remediation of the site and construction of a new commercial office building. Remedial work is being implemented by R3II in 2011 and 2012. The terms of the agreement hold R3II responsible for remedy implementation and R3II indemnifies Columbia for any future work necessary on the land portion of the site.

<u>Total Project Costs to Date</u>: Total incremental costs incurred by Columbia through November 2011, exclusive of the \$25,000 to be funded by Columbia, were \$2,455,167.65. This amount is comprised of \$718,780.97 previously incurred during prior periods and \$1,736,386.68 for work performed during the period December 2010 through November 2011. Attachment 6 sets forth a detailed breakdown of these expenses incurred during the period December, 2010 through November 2011.

Attachment 6

### Columbia Gas of Ohio, Inc. Summary of Toledo Structure Environmental Expenses January 1, 2008 - November 2011

Month	CE	ACTIV	TRAN CNTR	Amount	Description
8-Jan	3C23	7329	1121	586.67	Web Environmental Software
Total				586.67	
8-Feb	3C23	7329	1121	75.00	Vapor intrusion data base development
8-Feb	3C23	7329	1121	250.00	Lab data logic development
Total				325.00	
8-Mar	3C23	7329	1121	3,001.31	Toledo MGP Phase II follow up
8-Mar	3C23	7329	1121	2,904.10	Toledo MGP, product recovery and Pha
8-Mar	3C23	7329	1121	500.00	Arsenic data base review, background e
8-Mar	3C23	7329	1121	586.67	Web Environmental Software
8-Mar	3C23	7329	1 <b>12</b> 1	600.00	Review of soil vapor
Total				7,592.08	
8-Apr	3C23	7329	1121	7,816.63	Toledo MGP Phase II follow up
8-Apr	3C23	7329	1121	586.67	Web Environmental Software
8-Apr	3C23	7329	11 <b>21</b>	1,367.52	MGP general risk work
8-Apr	3C23	7329	1121	5,908.71	Toledo MGP Phase II follow up
Total				15,679.53	
8-Jun	3C23	7329	1121	5,280.40	Boundary and topographic survey
8-Jun	3C23	7329	1121	586.67	Web Environmental Software
8-Jun	3C23	7329	1121	586.67	Web Environmental Software
8-Jun	3C23	7329	1121	586.67	Web Environmental Software
8-Jun	3C23	7329	1121	586.67	Web Environmental Software
8-Jun	3C23	7329	1121	586.67	Web Environmental Software
8-Jun	3C23	7329	1121	2,496.00	Toledo MGP Phase II follow up
Total				10,709.75	
8-Jul	3C23	7329	1121	3,270.00	Boundary and topographic survey
8-Jul	3C23	7329	1121	1,673.16	Toledo MGP Phase II follow up

Total

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Attachment 6

	8-Aug	2081	7329	1121	25.71	Equipment charge
	8-Aug	3C23	7329	1121	2,234.50	Boundary and topographic survey
	8-Aug	3C23	7329	1121	713.36	Boundary and topographic survey
	0 Aug	5025	7525	T T T T	715.50	boundary and topographic survey
Tot	al				2,973.57	
	8-Sep	3C23	7329	1121	1,383.26	Toledo MGP Phase II follow up
Tot	al				1,383.26	
	8-Oct	3C23	7329	1121	4,083.00	Toledo MGP Phase II follow up
Tot	al				4,083.00	
	• •					
Tot	al Januar	y 2008 - O	ctober 2008		48,276.02	
	8-Nov	3C23	7329	1121	586.67	Web Environmental Software
	8-Nov	3C23	7329	1121	586.67	Web Environmental Software
	8-Nov	3C23	7329	1121	586.67	Web Environmental Software
Tot	al				1,760.01	
	8-Dec	3C23	7329	1121	29,135.00	Toledo MGP Phase II follow up
	8-Dec	3C23	7329	1121	586.67	Web Environmental Software
	8-Dec	3C23	7329	1121	586.67	Web Environmental Software
	8-Dec	3C23	7329	1121	586.67	Web Environmental Software
Tot	al				30,895.01	
	9-Jan	3B60	7329	1121	3,470.93	Aqueous/cyanide environmental testing
	9-Jan	3B60	7329	1121	2,362.34	Soil/cyanide environmental testing
	9-Jan	3B60	7329	1121	4,837.03	Aqueous/cyanide environmental testing
	9-Jan	3C23	7329	1121	172.80	NIS MGP Risk - general
	9-Jan	3B60	7329	1121	5,774.60	Soil/cyanide environmental testing
	9-Jan	3C23	7329	1121	1,089.60	NIS MGP Risk - general
	9-Jan	3C23	7329	1121	76,056.43	Toledo MGP Phase II follow up
	9-Jan	3C23	7329	1121	11,844.69	Toledo MGP Phase II follow up
	9-Jan	3C23	7329	1121	714.28	Evaluation of arsenic background data
	_ 0011				, <b>1</b> -n20	
	9-Jan	3B60	7329	1121	3,149.78	Soil/cyanide environmental testing
	9-Jan	3K14	7329	1121	1,747.52	Office design services
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Total

Attachment 6

9-Feb	3B60	7329	1121	1,242.54	Technical assistance from Ohio EPA
9-Feb	3C23	7329	1121	6,933.35	Toledo MGP Phase II follow up
9-Feb	3C23	7329	1121	818.00	NIS MGP Risk - general
9-Feb	3C23	7329	1121	586.67	Web Environmental Software
Total				9,580.56	
9-Mar	3C23	7329	1121	6,374.99	Toledo MGP Phase II follow up
9-Mar	3C23	7329	1121	77.66	NIS MGP Risk - general
9-Mar	3C23	7329	1121	750.00	Site windshield survey
9-Mar	3K14	7329	1121	9,578.14	Relocation service
9-Mar	3K14	7329	1121	7,785.06	Relocation service
9-Mar	3K14	7329	1121	1,804.08	Relocation service
9-Mar	3K14	7329	1121	978.50	Relocation service
Total				27,348.43	
9-Apr	3C23	7329	1121	586.67	Web Environmental Software
9-Apr	2020	7329	1121	2,241.75	Installation services
5140	2020	,020		2,2-12.7 3	
Total				2,828.42	
9-May	3C23	7329	1121	3,955.70	Toledo MGP Phase II follow up
9-May	3C23	7329	1121	586.67	Web Environmental Software
Total				4,542.37	
10101				4,342.37	
9-Jun	3C23	7329	1121	2,904.67	Toledo MGP Phase II follow up
9-Jun	3C23	7329	1121	586.66	Web Environmental Software
9-Jun	3C23	7329	1121	473.09	Toledo MGP Phase II follow up
9-Jun	3C23	7329	1121	308.00	Dues for MGP Consortium
Total				4 572 42	
Total				4,272.42	
9-Jul	3C23	7329	1121	3,032.92	Toledo MGP Phase II follow up
9-Jul	3C23	7329	1121	586.67	Web Environmental Software
9-Jul	3C23	7329	1121	586.67	Web Environmental Software
<b>T</b>					
Total				4,206.26	
9-Aug	3B60	7329	1121	500.00	Dues for MGP Consortium
9-Aug	3C23	7329	1121	586.66	Web Environmental Software
0 4	2011	7000	4474	334 54	Tolodo MCD Dhara U.f. U
9-Aug	3C23	7329	1121	331.24	Toledo MGP Phase II follow up

Tota	1				1,417.90	
	9-Sep	3C23	7329	1121	7,094.15	Toledo MGP Phase II follow up
	9-Sep	3C23	7329	1121	586.67	Web Environmental Software
Tota	l				7,680.82	
	9-Oct	3C23	7329	1121	6,021.92	Toledo MGP Phase II follow up
	9-Oct	3C23	7329	1121	586.67	Web Environmental Software
	9-Oct	3C23	7329	<b>1</b> 1 <b>2</b> 1	586.67	Web Environmental Software
	9-Oct	3K14	7329	1121	14,182.00	Relocation services
	9-Oct	3K14	7329	1121	5,924.06	Relocation services
Tota	1				27,301.32	
Tota	l Novem	ber 2008 - C	october 200	9	233,053.52	
	9-Nov	3C23	7329	1121	586.67	Web Environmental Software
	9-Nov	3C23	7329	1121	9,086.02	Toledo MGP Phase II follow up
Tota	ıl				9,672.69	
	9-Dec	3C23	7329	1121	1,760.00	Web Environmental Software
Tota	ıl				1,760.00	
	10-Jan	3B60	7329	1121	5,973.98	Environmental testing
	10-Jan	3C23	7329	1121	30,944.68	Toledo MGP Phase II follow up
	10-Jan	3C23	7329	1121	25,257.62	Toledo MGP Phase II follow up
Tota	ıl				62,176.28	
-	10-Feb	3B60	7329 <sup>·</sup>	1121	2,526.31	Environmental testing
	10-Feb	3B60	7329	1121	2,767.10	Environmental testing
	10-Feb	3B60	7329	1121	3,138.75	Environmental testing
•	10-Feb	3B60	7329	1121	4,611.83	Environmental testing
-	10-Feb	3B60	7329	1121	3,689.46	Environmental testing
-	10-Feb	3B60	7329	1121	1,844.73	Environmental testing
	10-Feb	3C23	7329	1121	563.20	Web Environmental Software
	10-Feb	3C23	7329	1121	50,769.90	Toledo MGP Phase II follow up
Tota	al				69,911.28	
1	0-Mar	3C23	7329	1121	28,095.33	Toledo MGP Phase II follow up

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Attachment 6

Total				28,095.33	
10-Apr	3C23	7329	1121	62,608.53	Toledo MGP Phase II follow up
Total				62,608.53	
10-May	3C23	7329	1121	38,483.87	Toledo MGP Phase II follow up
10-May	3C23	7329	1121	11,045.72	Valuation of real estate
10-May	3C23	7329	1121	3,200.00	Commercial summary report
10-May	3C23	7329	1121	100.00	Calculation of acreage
Total				52,829.59	
10-Jun	3C23	7329	1121	22,032.97	Toledo MGP Phase II follow up
10-Jun	3B60	7329	1121	500.00	Flow controller rental
10-Jun	3C23	7329	1121	526.34	Environmental application design and d
Total				23,059.31	
10-Jul	3C23	7329	1121	6,365.51	Toledo MGP Phase II follow up
10-Jul	3C23	7329	1121	445.20	Public notice
10-Jul	50	7329	1121	97,790.02	Property purchase
10-Jul	50	7329	1121	580.65	Prorated lease buyout
10-Jul	50	7329	1121	20.00	Prorated lease buyout
Total				105,201.38	
10-Aug	3C23	7329	1121	500.00	Dues for MGP Consortium
10-Aug	3C23	7329	1121	17,590.41	Toledo MGP services
10-Aug	3C23	7329	1121	3,138.90	Legal descriptions and drawings
10-Aug	3C23	7329	1121	445.83	Environmental application design and d
10-Aug	3B66	7329	1221	2,198.00	Transportation and disposal of waste
Total				23,873.14	
10-Sep	3C23	7329	1121	3,419.57	Toledo MGP services
10-Sep	3B60	7329	1121	14,383.99	Technical assistance from Ohio EPA
Total				17,803.56	
10-Oct	3C23	7329	1121	3,299.67	Toledo MGP services
Total				3,299.67	

Total November 2009 - October 2010 460,290.76 10-Nov 3C23 7329 1121 2,160.67 Toledo MGP services Total 2,160.67 Total Jan 08 - Nov 10 743,780.97 3C23 7329 1121 10-Dec **Toledo MGP services** 1,981.56 Total 1,981.56 11-Feb 3C23 7329 1121 450.26 **Toledo MGP services** Total 450.26 3C23 7329 1121 11-Mar 1,282.82 **Toledo MGP services** 11-Mar 3B66 7329 1121 694.00 Transportation and disposal of waste Total 1,976.82 11-Apr 3C23 7329 1121 276,455.00 Funding to the remediation escrow 11-Apr 3C23 7329 1121 1.82 Equipment charge 11-Apr 3K40 7329 1121 199,101.00 Pollution legal liability insurance Total 475,557.82 11-May 3C23 7329 1261 363.19 **Toledo MGP services** 11-May 3C23 7329 1261 560.00 **Engineering review** Total 923.19 11-Jun 3C23 7329 1121 4.06 Equipment charge Funding to the remediation escrow 11-Jun 3C23 7329 1121 165,260.00 Total 165,264.06 11-Jul 3C23 7329 1261 210.00 Project management support Total 210.00 7329 1121 11-Aug 3C23 60.77 Equipment charge

Attachment 6

Total 60.77 11-Sep Technical assistance from Ohio EPA 3C23 7329 1121 410.20 11-Sep 3C23 7329 1261 755.00 Engineering review 11-Sep 3C23 7329 1121 Funding to the remediation escrow 1,086,242.00 Total 1,087,407.20 11-Oct 3C23 7329 1261 615.00 **Engineering review** Total 615.00 11-Nov 3C23 7329 1261 1,940.00 **Engineering review** Total 1,940.00 Total Dec 10 - Nov 11 1,736,386.68 **Total All Payments** 2,480,167.65 Less: Company Funded Amount 25,000.00 **Net Deferred Amount** 2,455,167.65

#### Swan Creek - Manufactured Gas Plant

<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 EPA's Voluntary Action Program ("VAP") regulations by the new property owner, River Road Redevelopment II, 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 former MGP property, located at 333 South Erie Street, Toledo, is adjacent to Swan Creek. The indemnification with R3ll 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 with 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 in 2011. As a result, Columbia will be investigating and remediating the sediments in Swan Creek for the foreseeable future.

<u>Total Project Costs to Date</u>: Total incremental costs incurred by Columbia during the period December 2010 through November 2011, exclusive of the \$25,000 to be funded by Columbia, were \$3,000.00. Attachment 8 sets forth a detailed breakdown of these expenses incurred during the period December 2010 through November 2011.

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#### Columbia Gas of Ohio, Inc. Summary of Toledo - Swan Creek Environmental Expenses December 2010 - November 2011

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Month	CE	ACTIV	TRAN CNTR	Amount	Description
11-Nov	3C23	7330	1121	28,000.00	Installation of data logger and summarization of sediment issues
Total through November 2011					
Total All Payments				28,000.00	
Less: Company Funded Amount					
Net Deferred Amount					

#### Fremont Manufactured Gas Plant, Fremont, Ohio

Description: Columbia Gas of Ohio, Inc.'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 it 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 Property Assessment ("PA") in conformance with Ohio EPA's Voluntary Action Program 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. Therefore, additional investigation is warranted. As a result, Columbia will be investigating this property for the foreseeable future.

<u>Total Project Costs to Date</u>: Total incremental costs incurred by Columbia during the period December 2010 through November 2011, exclusive of the \$25,000 to be funded by Columbia, were \$18,223.18. Attachment 10 sets forth a detailed break-down of these expenses incurred during the period December 2010 through November 2011.

### Columbia Gas of Ohio, Inc. Summary of Freemont Environmental Expenses December 2010 - November 2011

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Month	CE	ACTIV	TRAN CNTR	Amount	Description
11-Sep	3C23	7703	1053	488.75	Community relations services
Total				488.75	
11-Oct 11-Oct	3C23 3C23	7703 7703	1053 1053	1,148.00 32,765.63	Dues for MGP Consortium Site assessment
Total				33,913.63	
11-Nov	3C23	7703	1053	8,820.80	Site assessment
Total				8,820.80	
Total December 2010 -	November	2011		43,223.18	
Total All Payments				43,223.18	
Less: Company Funded	Amount			25,000.00	
Net Deferred Amount				18,223.18	

### Former Manufactured Gas Plant Sites, Fostoria, OH

<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 EPA's Voluntary Action Program regulations . Since MGPs are a recognized environmental condition, Columbia will be conducting additional investigations at this MGP property for the foreseeable future.

<u>Total Project Costs to Date</u>: Total incremental costs incurred by Columbia during the period December 2010 through November, 2011, exclusive of the \$25,000 to be funded by Columbia, were \$48,143.06. Attachment 12 sets forth a detailed breakdown of these expenses incurred during the period December 2010 through November 2011.

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### Columbia Gas of Ohio, Inc. Summary of Fostoria Environmental Expenses December 2010 - November 2011

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Month	CE	ACTIV	TRAN CNTR	Amount	Description
11-Jan	3C23	7901	1031	562.00	Title searches
Total				562.00	
11-Jul	3C23	7901	1031	3,939.74	Targeted historical research - Phase I
Total				3,939.74	
11-Aug	3C23	7901	1031	7,151.32	Targeted historical research - Phase II
Total				7,151.32	
<b>11-</b> Sep	3C23	7901	1031	1,490.00	Targeted historical research - Phase II
Total				1,490.00	
11-Oct	3C23	7901	1031	60,000.00	Site assessment
Total				60,000.00	
Total December 2010	) - November	2011		73,143.06	
Total All Payments			73,143.06		
Less: Company Fund	ed Amount		25,000.00		
Net Deferred Amoun	t			48,143.06	

#### Columbia Gas of Ohio, inc. Summary of Environmental Expenses January 2008 - November 2011

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Accounting Period	Marion \$	Bellevue \$	Goodale \$	Toledo Structure \$	Toledo River \$	Freemont \$	Fostoria \$	Total \$
Prior Reporting Periods	300,455.16	18,971.29	475,000.00	-	-	-	-	<b>794,426.4</b> 5
Dec. 2010 - Nov 2011	438,788.33	174,639.46	-	2,455,167.65	3,000.00	18,223.18	48,143.06	3,137,961.68
Total	739,243.49	193,610.75	475,000.00	2,455,167.65	3,000.00	18,223.18	48,143.06	3,932,388.13

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

Summary: Annual Report Annual Deferral Report of Columbia Gas of Ohio, Inc. electronically filed by B. Scott on behalf of Columbia Gas of Ohio