BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Investigation of Columbia Gas of Ohio, Inc., Relative to its Compliance with the Natural Gas Pipeline Safety Standards and Related Matters.	: : : :	Case No. 19-452-GA-GPS

JOINT STIPULATION AND RECOMMENDATION

The Ohio Administrative Code (Ohio Adm.Code) 4901-1-30 provides that any two or more parties may enter into a written stipulation covering the issues presented in this proceeding. This Joint Stipulation and Recommendation ("Stipulation") sets forth the understanding of Columbia Gas of Ohio, Inc. ("Columbia") and the Staff of the Public Utilities Commission of Ohio ("Staff"), each of whom is a "Signatory Party" and together constitute the "Signatory Parties."[1] The Signatory Parties recommend that the Public Utilities Commission of Ohio ("Commission") approve and adopt this Stipulation, which resolves all of the issues identified by the Staff in its Compliance Order dated August 16, 2018 (Attachment B).

The Signatory Parties engaged in settlement discussions in an effort to reach a mutually acceptable resolution that would address the concerns raised in Staff's Compliance Order. As a result of those discussions, the Signatory Parties enter into this Stipulation. This Stipulation is supported by adequate data and information; represents a just and reasonable resolution of the issues raised in the Compliance Order; violates no regulatory principle or precedent; as a package, benefits ratepayers and the public interest; and is the product of serious negotiations

[1] Pursuant to Ohio Adm.Code 4901-1-10(C) and 4901-1-30, Staff is deemed a party for purposes of entering into this Stipulation.

among knowledgeable and capable parties to resolve the issues raised in the Compliance Order. Although the Signatory Parties recognize that this Stipulation is not binding upon the Commission, the Signatory Parties respectfully submit that it is entitled to careful consideration by the Commission. For purposes of resolving certain issues raised by these proceedings, the Signatory Parties stipulate, agree, and recommend as set forth below. This Stipulation is a reasonable compromise involving a balancing of competing positions and it does not necessarily reflect the position that either Signatory Party would have taken if these issues had been fully litigated.

The Signatory Parties fully support this Stipulation and request that the Commission accept and approve the terms.

WHEREAS, all of the related issues and concerns raised by the Signatory Parties have been addressed in the substantive provisions of this Stipulation and reflect, as a result of such discussions and compromises by the Signatory Parties, an overall reasonable resolution of all such issues. The Stipulation is not an admission or finding of liability, and is not intended to reflect the views or proposals that either Signatory Party may have advanced acting unilaterally. Accordingly, this Stipulation represents an accommodation of diverse interests represented by the Signatory Parties and is entitled to careful consideration by the Commission.

WHEREAS, this Stipulation represents a serious compromise of complex issues and involves substantial benefits that would not otherwise have been achievable;

WHEREAS, on August 16, 2018, Staff issued a Notice of Probable Noncompliance, which is attached hereto as Attachment A, and on August 16, 2018, Staff issued a Compliance Order to Columbia regarding several issues identified therein, which is attached hereto as Attachment B;

WHEREAS, Columbia and Staff met to address the issues raised in the Staff's Compliance Order and have reached a resolution of all issues; and

WHEREAS, the Signatory Parties believe that the terms and conditions agreed to herein represent a fair and reasonable solution to the issues raised in the Compliance Order:

NOW, THEREFORE, the Signatory Parties stipulate, agree and recommend that the Commission make the following findings and issue its Opinion and Order in this case approving this Stipulation in accordance with the following:

1. Columbia's pipeline system meets the definition of a distribution system found in Title 49 of the Code of Federal Regulations (C.F.R.) Part 192.3 and, as such, must be designed, constructed, operated, and maintained in accordance with the Pipeline Safety Regulations contained in Title 49 of the United States Code (U.S.C.) Chapter 601, 49 C.F.R. Part 192, Ohio Revised Code (R.C.) 4905.90 et. seq., and Ohio Adm.Code Chapter 4901:1-16.
2. On August 2, 2017, an incident, defined as an event that involves a release of gas from a pipeline resulting in estimated property damage of $50,000 or more under 49 C.F.R. Part 191, occurred at 4149 Case Road, Avon Ohio, caused by a release of natural gas from pipelines operated by Columbia.
3. Staff conducted an investigation on August 2, 2017 and issued a letter and a Notice of Probable Noncompliance ("PNC") (Attachment A) on August 16, 2018. Staff determined that Columbia failed to locate a natural gas service line while responding to a locate request ticket made through the Ohio Utilities Protection Service. In the PNC, Staff identified the following probable non-compliances with

portions of the federal pipeline safety regulations found in sections: 49 C.F.R. 192.13(c), 192.613(a), 192.614(c), 192.703(c), and 192.727(b).

4. Additionally, Staff issued a Compliance Order (Attachment B) on August 16, 2018, instructing Columbia to complete four tasks within thirty days and two tasks within ninety days.

5. On September 24, 2018, Columbia responded to the Staff's Compliance Order and indicated that it was in compliance with all of the directives that were to be performed within thirty days. (Attachment C).

6. On November 14, 2018, Columbia submitted a letter to Staff stating that it had complied with the Staff's ninety-day directives (Attachment D).

7. After reviewing Columbia's responses, Staff determined that Columbia satisfied the directives in the Compliance Order.

8. Staff and Columbia agree that Columbia will pay a forfeiture of $400,000. The payment shall be paid within thirty days of the order approving this Stipulation. The payment shall be made payable to "Treasurer State of Ohio," and mailed to PUCO, Attn: Fiscal Division, 180 E. Broad St., 4th floor, Columbus, OH 43215-3793. The case number (19-452-GA-GPS) should appear on the face of the check.

9. The Signatory Parties state that this Stipulation establishes no precedent to be relied upon in any manner in any other proceeding except any proceeding that may be necessary to enforce the provisions of this Stipulation.

10. This Stipulation constitutes a compromise resolution by the Signatory Parties of all issues raised by the Signatory Parties in this case. The Signatory Parties agree that if the Commission rejects all or any part of this Stipulation, or otherwise materially modifies its

terms, either Signatory Party shall have the right, within thirty days after the date of the Commission's order, either to file an application for rehearing or to terminate and withdraw from the Stipulation by filing a notice of termination and withdrawal with the Commission in this proceeding. If an application for rehearing is filed and if the Commission does not, on rehearing accept the Stipulation without material modification, either Signatory Party may terminate and withdraw from the Stipulation by filing a notice of termination and withdrawal with the Commission in this proceeding within ten business days after the date of the Commission's Entry on Rehearing. Upon filing of a notice of termination and withdrawal by either Signatory Party, the Stipulation shall immediately become null and void. In such event, a hearing shall go forward and the Signatory Parties shall be afforded the opportunity to present evidence through witnesses, to cross-examine all witnesses, to present rebuttal testimony, and to file briefs on all issues, and to have this proceeding decided on the record and briefs as if the Stipulation had never been executed.

The undersigned hereby stipulate and agree and each represents that it is authorized to enter into this Stipulation and Recommendation on this 22nd day February 2019.

On behalf of the Columbia Gas of Ohio, Inc.

/s/Joseph M. Clark (per email authority)
Joseph M. Clark
Sr. Counsel
Columbia Gas of Ohio, Inc.
290 W. Nationwide Blvd.
Columbus, OH 43215
614.460.6988 (Telephone)
josephclark@nisource.com

Public Utilities Commission of Ohio

/s/Jodi J. Bair
Jodi J. Bair
Assistant Attorney General
Public Utilities Section
30 E. Broad St., 16th FL
Columbus, OH 43215
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Jodi.bair@ohioattorneygeneral.com

ATTACHMENT A

THE PUBLIC UTILITIES COMMISSION OF OHIO
GAS PIPELINE SAFETY SECTION

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

NOTICE OF PROBABLE NONCOMPLIANCE

Sent to Daniel Creekmur Title President
Operator Columbia Gas of Ohio, Inc.
Address 290 W Nationwide Blvd.
City Columbus State OH Zip Code 43215

Date of Inspection August 2, 2017
Place of Inspection 4149 Case Road, Avon, Ohio 44011
GPS Inspectors Chris Domonkos, Michael F. Purcell II, Keith Topovski

DESCRIPTION

ALL PROBABLE NONCOMPLIANCES LISTED BELOW SHOULD BE CORRECTED OR ACTION TAKEN TO CORRECT WITHIN 30 DAYS OF RECEIPT OF CERTIFIED LETTER.

(1) Section 192.13(c) (49 C.F.R.); Title: What general requirements apply to pipelines regulated under this part?
(2) Section 192.613(a) (49 C.F.R.); Title: Continuing surveillance.
(3) Section 192.614(c) (49 C.F.R.); Title: Damage prevention program.
(4) Section 192.703(c) (49 C.F.R.); Title: General.
(5) Section 192.727(b) (49 C.F.R.); Title: Abandonment or deactivation of facilities.

Describe Probable Noncompliance

49 C.F.R. 192.13 *(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

Columbia did not follow its Operation and Maintenance procedure GS 1740.010 "Abandonment of Facilities." Section 3.2 "Abandoning Service Lines" states "When abandoning service lines, the piping must be disconnected from the gas supply and customer's house lines, and the abandoned pipe end(s) sealed." Columbia abandoned a two-inch service line at 4149 Case Road, Avon, Ohio on November 8, 2012 without disconnecting the abandoned two-inch service line from the gas supply.

49 C.F.R. 192.613 *(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.*

Columbia failed to identify the unusual operating conditions at 4149 Case Road, Avon, Ohio and take appropriate action between 1979 and 2017. The Columbia Tap Card for the property dated 1979 describes a service line to two separate meters and two separate accounts. However, the map on the Tap Card shows a single service line extending to the location of the meter at the residence and nothing extending to the former greenhouse approximately 200 feet away. The Tap Card also shows the service line to the meter at the residence was a one-inch plastic line, but the meter at the greenhouse was connected to a two-inch riser. These descriptions are

inconsistent and identifiable while performing leak surveys, meter reads, a riser replacement in 1998, and during meter abandonment in 2012.

49 C.F.R. 192.614 *(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:*
***
(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

Columbia failed to mark an improperly abandoned two-inch idle service line at 4149 Case Road, Avon, Ohio after receiving notice of an intent to excavate in the area through the Ohio Utilities Protection Service (OUPS) one-call system. The company's records did not indicate the existence of the two-inch idle service line, instead identifying a tandem line stretching from the original service line and residential meter to the greenhouse.

49 C.F.R. 192.703 *(c) Hazardous leaks must be repaired promptly.*

Columbia failed to promptly repair the hazardous leak involved in this matter when it took approximately 45 minutes to arrive at the scene after being contacted by the fire department and then approximately one hour and 45 minutes to stop the flow of gas once responders arrived. A prompt response to the hazardous leak may have prevented significant property damage. Staff's Investigation revealed that the Columbia employees at the scene assumed the two-inch damaged service line was associated with a local production operation and did not want to take action to stop the flow of gas on a pipeline that they presumed was not owned by Columbia.

49 C.F.R. 192.727 *(b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.*

Columbia failed to physically disconnect the service line from the gas supply when abandoning the two-inch idle service line at 4149 Case Road, Avon, Ohio. The meter was removed, but the line was not purged and the pipe was not disconnected from the source of gas. The employees of Columbia failed to notice that the line they were disconnecting was a two-inch service line, while the meter attached to the residence was a one-inch service line, a situation that indicated there had to be a second service line.

ATTACHMENT B

Ohio | Public Utilities Commission

Asim Z. Haque, Chairman

Commissioners

M. Beth Trombold
Thomas W. Johnson
Lawrence K. Friedeman
Daniel R. Conway

August 16, 2018

Mr. Daniel Creekmur, President
Columbia Gas of Ohio, Inc.
290 W Nationwide Blvd.
Columbus, OH 43215

Mr. Creekmur:

On August 2, 2017, an incident occurred at 4149 Case Road, Avon, Ohio (hereinafter, the "Incident") resulting from a release of natural gas from pipelines operated by Columbia Gas of Ohio, Inc. ("Columbia"). The Public Utilities Commission of Ohio ("PUCO") Gas Pipeline Safety Staff ("Staff") conducted an investigation of the Incident and determined that Columbia failed to locate a natural gas service line while responding to a locate request ticket made through the Ohio Utilities Protection Service, which resulted in an excavator striking and damaging the line and starting a house fire at the residence located on the property. As a result of this investigation, the Staff has issued the following Notice of Probable Noncompliance to Columbia for review. A written response is expected within 30 days from the date of this letter.

The Staff investigation concluded that the root cause of the house fire at 4149 Case Road, Avon, Ohio was a failure to maintain adequate records regarding the location of a two-inch service line used to supply gas to a greenhouse on the property. This line was installed in the mid to late 1970's with service discontinued in 2012. Columbia had no documentation that the damaged service line service line was part of their system which led to a failure to mark the line when Columbia was notified of an excavation in the area. The problem was compounded by Columbia field personnel making an incorrect assumption that the greenhouse meter and home meter were part of the same service line when discontinuing service in 2012, which resulted in the line not being properly abandoned. Columbia employees had several opportunities to notice conditions at the property did not match available Columbia records, but those conditions were missed, including the undocumented capped and locked riser at the former greenhouse meter bar during line location.

Staff also notes that it took approximately 2 ½ hours between the time Columbia was notified of the Incident and when gas feeding the fire at the property was shut off.

ATTACHMENT B

On June 23, 2015, in Commission Case No. 15-1351-GA-GPS, Columbia was cited for a failure to properly abandon a service line. That failure also resulted in a home explosion at 3418 Sunningdale Way, Upper Arlington, Ohio. Since that time Staff has issued three additional Notices of Probable Noncompliance to Columbia for failure to locate lines due to inadequate records. Staff concludes that the corrective action undertaken by Columbia as defined under the stipulation in Case No. 15-1351-GA-GPS have not been effective. A Compliance Order is included with this letter detailing the actions Columbia must take in order to minimize the potential for similar incidents to occur in the future.

Due to the magnitude of the present violation and history of similar violations, a forfeiture in the amount of $400,000.00 is assessed for violations of the Pipeline Safety Regulations in accordance with the Ohio Administrative Code 4901:1-16-09.

You may contact me at (614) 644-8983 or by e-mail at peter.chace@puco.ohio.gov with any questions.

Sincerely,

Peter A. Chace
Public Utilities Commission of Ohio
Gas Pipeline Safety Program Manager

PC:ts
Enclosures

COMPLIANCE ORDER

Pursuant to Ohio Administrative Code 4901:1-16-09, Staff issues Columbia the following Compliance Order requiring corrective action in order to return to compliance with pipeline safety regulations.

The following must be completed within thirty (30) days from the date of this Compliance Order:

1: The Commission ordered Columbia to perform certain actions to revise and update its training curriculum as part of the Commission's investigation into a home explosion in Upper Arlington on March 21, 2015. One of these requirements was that "Columbia employees will be trained to review the work location and identify abnormalities associated with facilities upon arrival at the work location."[1] Staff concludes Columbia's actions to comply with this requirement from the Commission were ineffective in this instance. Staff recommends a management review of the actions taken by company personnel at the scene in order to comply with this Commission order to ensure Columbia employees consider the possibility that maps and other records may be inaccurate, particularly for older systems, when considering taking actions to protect public safety.

2: Columbia should review its procedures for abandoning service meters and assess whether a review of the tap card(s) at the property prior to taking any action to abandon a meter short of excavating the service line and plugging it at the main should be required.

3: Columbia should review its Operator Qualification training materials for personnel involved in meter connection and disconnection, line locating, and other covered tasks such as leak surveys and class location surveys that involve inspecting pipeline systems in the field. Materials should emphasize that tap cards and other records of line locations may not be accurate, particularly for older pipeline systems, and that inconsistencies between records and field observations should be more fully investigated. The Columbia employees involved in the meter disconnection, line locating and emergency response all relied on inaccurate

[1] *In the matter of the Investigation of Columbia Gas of Ohio Relative to its Compliance with the Natural Gas Pipeline Safety Standards and Related Matters,* PUCO Case No: 15-1351-GA-GPS, page 6 at Paragraph(e).

records and did not react to observed conditions in the field by further investigating the locked off meter set at the abandoned greenhouse, attempting to locate curb boxes, etc.

4: Columbia should review its emergency response procedures to ensure expected response times and actions to stop the flow of gas are sufficient. Columbia took approximately 45 minutes to arrive at the scene after being contacted by the fire department, and then took approximately one hour and 45 minutes to stop the flow of gas once responders arrived. Staff finds that Columbia should have recognized the possibility that the damaged line may have been an undocumented service line and taken more aggressive action to investigate the source in an attempt to stop the flow of gas feeding the house fire.

The following must be completed within ninety (90) days from the date of this Compliance Order:

1: Columbia should perform a review of excavation damages with a reported cause of "Locating Practices Not Sufficient" for the purpose of identifying what parts of the Columbia system are more likely to experience problems with insufficient or inadequate records.

2: Columbia should review and update its current procedures for identifying high-risk one-call tickets. Tickets in portions of the Columbia system with a higher relative risk of incomplete and/or inaccurate records should be marked by more experienced locators that can better recognize inconsistencies in the field.

In addition to each of the aforementioned recommendations, Staff recommends Columbia develop and implement a holistic approach to ensuring similar instances do not reoccur. Staff further recommends that in developing this holistic plan, Columbia consider remedies beyond those considered through the resolution of the Upper Arlington matter.

ATTACHMENT C

3550 Johnny Appleseed Court
Columbus, Ohio 43231

Direct: 614.818.2110
rrsmith@nisource.com

Columbia Gas of Ohio
A NiSource Company

September 24, 2018

Mr. Peter Chace
Manager of Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

RE: Columbia Gas of Ohio, Inc.
Compliance Order
4149 Case Road, Avon, Ohio

Dear Mr. Chace:

This letter responds to the Compliance Order dated August 16, 2018, and received by Columbia Gas of Ohio, Inc. ("Columbia") on August 23, 2018. The Compliance Order arises from an incident at 4149 Case Road in Avon, Ohio on August 2, 2017 (the "Incident").

Pursuant to the Compliance Order, the following must be completed by **Monday, September 24, 2018**:

> *1: The Commission ordered Columbia to perform certain actions to revise and update its training curriculum as part of the Commission's investigation into a home explosion in Upper Arlington on March 21, 2015. One of these requirements was that "Columbia employees will be trained to review the work location and identify abnormalities associated with facilities upon arrival at the work location." Staff concludes Columbia's actions to comply with this requirement from the Commission were ineffective in this instance. Staff recommends a management review of the actions taken by company personnel at the scene in order to comply with this Commission order to ensure Columbia employees consider the possibility that maps and other records may be inaccurate, particularly for older systems, when considering taking actions to protect public safety.*

Columbia's Response:
Columbia conducted an after action review ("AAR") on the Incident promptly after it occurred. In response to the Compliance Order, Columbia revised its Operator

Qualification Modules M(1), M(1)(a), M(10), M(10)(a), M(2), M(2)(a), I(1), I(1)(a), I(1)(b), I(1)(c), and I(1)(d), effective as of September 21, 2018, to add that "field employees must consider the possibility that maps and other records may be inaccurate, particularly for older systems, when considering taking actions to protect public safety." Columbia's proposed changes to these Operator Qualification Modules is attached hereto as **Appendix A**. Columbia anticipates these proposed changes will be effective in September 21, 2018.

> *2: Columbia should review its procedures for abandoning service meters and assess whether a review of the tap card(s) at the property prior to taking any action to abandon a meter short of excavating the service line and plugging it at the main should be required.*

Columbia's Response:
Columbia reviewed its procedures for abandoning service meters and service lines. Columbia agrees with Commission Staff that company records (including service line records or tap cards) for abandonments, which are not a physical field abandonment (cutting, capping and plugging the line), will be reviewed to confirm that the physical infrastructure is no longer attached to our system or was properly abandoned. Columbia's gas standards defining the paper abandonment process, and the proposed changes thereto in response to this Compliance order, are attached hereto as **Appendix B**. Columbia anticipates these proposed changes will be effective as of September 21, 2018.

> *3: Columbia should review its Operator Qualification training materials for personnel involved in meter connection and disconnection, line locating, and other covered tasks such as leak surveys and class location surveys that involve inspecting pipeline systems in the field. Materials should emphasize that tap cards and other records of line locations may not be accurate, particularly for older pipeline systems, and that inconsistencies between records and field observations should be more fully investigated. The Columbia employees involved in the meter disconnection, line locating and emergency response all relied on inaccurate records and did not react to observed conditions in the field by further investigating the locked off meter set at the abandonment greenhouse attempting to locate curb boxes, etc.*

Columbia's Response:
Columbia reviewed its Operator Qualification modules for meter connection and disconnection, line locating, leak surveys, class location surveys, and other tasks

involving inspecting pipeline systems in the field. Columbia incorporated changes into its Operator Qualifications attached as **Appendix A** that the "tap cards and other records of line locations may not be accurate, particularly for older pipeline systems, and that inconsistencies between records and field observations should be more fully investigated." Columbia also included additional language to address the remediation of these inconsistencies.

> *4: Columbia should review its emergency response procedures to ensure expected response times and actions to stop the flow of gas are sufficient. Columbia took approximately 45 minutes to arrive at the scene after being contacted by the fire department, and then took approximately on house and 45 minutes to stop the flow of gas once responders arrived. Staff finds that Columbia should have recognized the possibility that the damaged line may have been an undocumented service line and taken more aggressive action to investigate the source in an attempt to stop the flow of gas feeding the house fire.*

Columbia's Response:
Columbia has reviewed its procedures for emergency response. Columbia incorporated into the gas standards changes to ensure that its service personnel promptly take action by controlling escaping gas by either stopping, closing valves, or other means, when its personnel determine there is "a hazardous situation." This change is incorporated into the gas standards attached hereto as **Appendix C**.

* * *

Pursuant to the Commission's Notice of Probable Noncompliance ("NOPN"), Columbia is required to correct or take action to correct by **Monday, September 24, 2018** of the following findings of probable noncompliance:

> *49 CFR 192.13(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*
>
> *Columbia did not follow its Operation and Maintenance procedure GS 1740.010 "Abandonment of Facilities." Section 3.2 "Abandoning Service Lines" states "When abandoning service lines, the piping must be disconnected from the gas supply and customer's house lines, and the abandoned pipe end(s) sealed." Columbia abandoned a*

two-inch service line at 4149 Case Road, Avon, Ohio on November 8, 2012 without disconnecting the abandoned two-inch service line from the gas supply.

Columbia's Response:
Columbia agrees with this finding of probable noncompliance, and is meeting the Compliance Order requirements to address this finding by September 24, 2018.

49 CFR 192.613(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

Columbia failed to identify the unusual operating conditions at 4149 Case Road, Avon, Ohio, and take appropriate action between 1979 and 2017. The Columbia Tap Card for the property dated 1979 describes a service line to two separate meters and two separate accounts. However, the map on the Tap Card shows a single service line extending to the location of the meter at the residence and nothing extending to the former greenhouse approximately 200 feet away. The Tap Card also shows the service line to the meter at the residence was a one-inch plastic line, but the meter at the greenhouse was connected to a two-inch riser. These descriptions are inconsistent and identifiable while performing leak surveys, meter reads, a riser replacement in 1998, and during meter abandonment in 2012.

Columbia's Response:
Columbia agrees with this finding of probable noncompliance, and is meeting the Compliance Order requirements to address this finding by September 24, 2018.

49 CFR 192.614(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:
***
(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

Columbia failed to mark an improperly abandoned two-inch idle service line at 4149 Case Road, Avon, Ohio after receiving notice of an intent to excavate in the area through the Ohio Utilities Protection Service (OUPS) one-call system. The company's records did not indicate the existence of the two-inch idle service line, instead

identifying a tandem line stretching from the original service line and residential meter to the greenhouse.

Columbia's Response:
Columbia agrees with this finding of probable noncompliance, and is meeting the Compliance Order requirements to address this finding by September 24, 2018.

49 CFR 192.703(c) Hazardous leaks must be repaired promptly.

Columbia failed to promptly repair the hazardous leak involved in this matter when it took approximately 45 minutes to arrive at the scene after being contacted by the fire department and then approximately one hour and 45 minutes to stop the flow of gas once responders arrived. A prompt response to the hazardous leak may have prevented significant property damage. Staff's investigation revealed that the Columbia employees at the scene assumed the two-inch damaged service line was associated with a local production operation and did not want to take action to stop the flow of gas on a pipeline that they presumed was not owned by Columbia.

Columbia's Response:
Columbia agrees with this finding of probable noncompliance, and is meeting the Compliance Order requirements to address this finding by September 24, 2018.

49 CFR 192.727(b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.

Columbia failed to physically disconnect the service line from the gas supply when abandoning the two-inch idle service line at 4149 Case Road, Avon, Ohio. The meter was removed, but the line was not purged and the pipe was not disconnected from the source of gas. The employees of Columbia failed to notice that the line they were disconnecting was a two-inch service line, while the meter attached to the residence was a one-inch service line, a situation that indicated there had to be second service line.

Columbia's Response:
Columbia agrees with this finding of probable noncompliance, and is meeting the Compliance Order requirements to address this finding by September 24, 2018.

Finally, in Commission Staff's correspondence, Staff assesses a forfeiture amount of $400,000. Columbia respectfully requests that this amount be held in abeyance to allow Columbia and Staff to work through the actions items contained in the Compliance Order.

Columbia will file a supplemental response to the Compliance Order addressing the 90-day action items by November 14, 2018. Should you have questions or need additional information please contact me at 614-818-2110.

Sincerely,

Rob Smith
Operations Compliance Manager
Columbia Gas of Ohio, Inc.

1. ***Locate the Pipeline.*** The pipeline shall be located by direct conductive method. The equipment should have the capability of obtaining depth readings, with peak and null indicators.

> Field employees must consider the possibility that service line records, maps and other records may be inaccurate, particularly for older pipeline systems. If you encounter inconsistencies between records and field observations they should be more fully investigated to protect public safety by taking action. Actions can range from additional record reviews to physical excavation. Discrepancies in records shall be corrected when identified.

2. ***Field Marking.*** The pipeline shall be marked at intervals of 10 to 100 feet spacing, depending on pipeline deflection and/or topography. The marking material (e.g., paint mark, flag) shall be visible from the previous marker while the survey is conducted.

   When completing a CIS for Pipeline Integrity the spacing will also depend on the data integration process (see Section 5 below).

3. ***Global Positioning Satellite (GPS).*** Typically, GPS coordinates will be obtained for a CIS completed for Pipeline Integrity purposes.

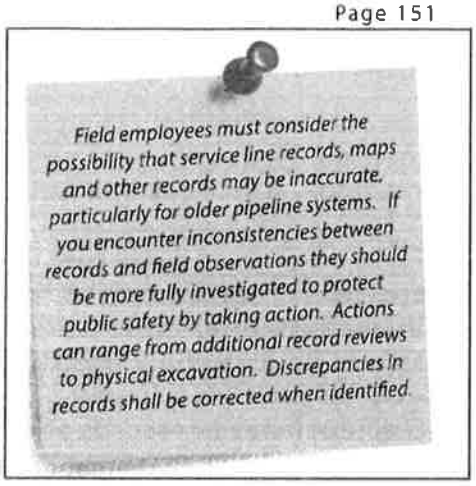
   GPS equipment used for the purpose of surveying must have sub-meter accuracy. The GPS unit must be given adequate time for logging depending on the satellite power reception indicator. Batteries shall be checked daily before the equipment is used.

   All post-processing should be completed within two weeks of survey.

   A. ***Locations.*** GPS points are to be taken at intervals according to Section 2 of this procedure, within the boundary of the survey (e.g., HCA) at the beginning and ending station locations, significant geographical locations (e.g., top of creek banks, ditch bottom, edges of pavement), locations where different pipe properties (e.g., diameter, wall thickness, pipe grade) meet, wire breaks, foreign crossings, and proximity of AC or other current sources, if practical.

      Comments shall be documented on each point to indicate geographical locations, address, pole numbers, or any other land marks to identify alignment.

4. ***Interruption***. All rectifiers shall be interrupted and synchronized by using GPS or master/slave methodology. The pipeline shall be checked on oscilloscope for inverted AC or DC spikes due to another influence



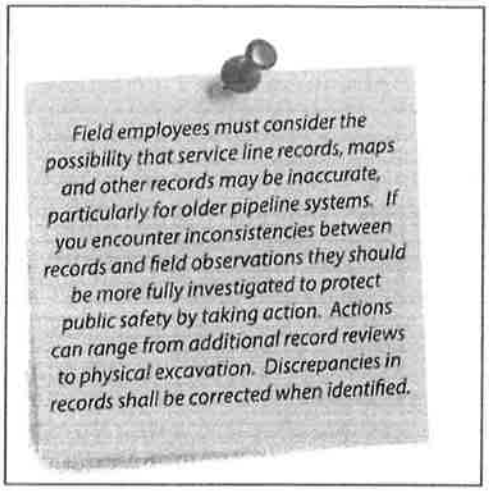
Guidelines to determine if monitoring is needed:

- Excavation site within 25 feet of center line of the pipeline
- Directional drilling above or below pipeline structure
- Any blasting within a 300 foot radius of the facility

Monitoring

Operations personnel will evaluate the site upon arrival and perform the following steps:

- Evaluate maps and confirm location of pipeline
- Establish an emergency response with valve locations
- No valves shall be closed without the approval of your leader
- Evaluate the excavation process (within 25 feet of pipeline)
- Maintain constant communication and surveillance of the excavation
- If the excavator is within 5 feet of the facility, pinpoint the pipeline by a non-mechanical tool such as a VAC excavation, shovel or probe
- Anytime TC main is exposed, a Corrosion Personnel shall be notified
  - » Corrosion personnel will need to collect pertinent pipeline integrity data
- If coating damaged contact Corrosion personnel for repair recommendations
- If pipeline is damaged, refer to GS 1730.010 table 3, notify your leader and the pipeline integrity management team
- Document all findings and actions onto WMS or equivalent job order remarks section and execute job order



Guidelines to determine if monitoring is needed:

- Excavation site within 25 feet of center line of the pipeline
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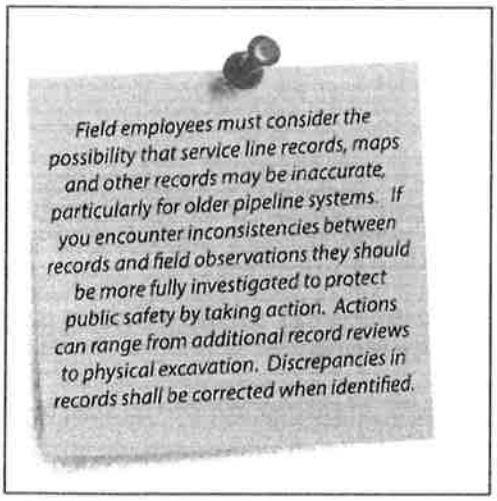
Monitoring

Operations personnel will evaluate the site upon arrival and perform the following steps:

- Evaluate maps and confirm location of pipeline
- Establish an emergency response with valve locations
- No valves shall be closed without the approval of your leader
- Evaluate the excavation process (within 25 feet of pipeline)
- Maintain constant communication and surveillance of the excavation
- If the excavator is within 5 feet of the facility, pinpoint the pipeline by a non-mechanical tool such as a VAC excavation, shovel or probe
- Anytime TC main is exposed, a Corrosion Personnel shall be notified
  - » Corrosion personnel will need to collect pertinent pipeline integrity data
- If coating damaged contact Corrosion personnel for repair recommendations
- If pipeline is damaged, refer to GS 1730.010 table 3, notify your leader and the pipeline integrity management team



Guidelines to determine if monitoring is needed:

- Excavation site within 25 feet of center line of the pipeline
- Directional drilling above or below pipeline structure
- Any blasting within a 300 foot radius of the facility

Monitoring

Operations personnel will evaluate the site upon arrival and perform the following steps:

- Evaluate maps and confirm location of pipeline.
- Establish an emergency response with valve locations.
- No valves shall be closed without the approval of your leader.
- Evaluate the excavation process (within 25 feet of pipeline).
- Maintain constant communication and surveillance of the excavation.
- If the excavator is within 5 feet of the facility, pinpoint the pipeline by a non-mechanical tool such as a VAC excavation, shovel or probe.
- Anytime TC main is exposed, a Corrosion Personnel shall be notified.
    - » Corrosion personnel will need to collect pertinent pipeline integrity data.
- If coating damaged contact Corrosion personnel for repair recommendations.
- If pipeline is damaged, refer to GS 1730.010 table 3, notify your leader and the pipeline integrity management team.
- Document all findings and actions onto WMS or equivalent job order remarks section and execute job order.

Subpart O—Gas Transmission Pipeline Integrity Management

This subpart prescribes minimum requirements for an integrity management program on any gas transmission pipeline covered under this part. For gas transmission pipelines constructed of plastic, only the requirements in §§192.917, 192.921, 192.935 and 192.937 apply.

Field employees must consider the possibility that service line records, maps and other records may be inaccurate, particularly for older pipeline systems. If you encounter inconsistencies between records and field observations they should be more fully investigated to protect public safety by taking action. Actions can range from additional record reviews to physical excavation. Discrepancies in records shall be corrected when identified.

- *Third Party Monitoring...*

Federal regulations now require operators to monitor excavation within the vicinity of transmission class (TC) pipelines. In accordance with Federal inspection protocols, state inspectors review records to verify compliance.

Qualified operator personnel must monitor all excavations conducted on covered segments.

- If an operator finds physical evidence of encroachment involving excavation near a covered segment that the operator did not monitor, then the operator must either excavate the area near the encroachment or conduct an above ground survey using methods defined in NACE RP0502-2002.
- Operators must document that excavations were monitored. Inspectors may select sample one-call tickets for detailed review of excavation records to verify that the operator documented the excavation and that it was monitored by a qualified person. Records should also document how the operator became aware of the excavation, such as:
    - » One call
    - » Direct contact by excavators
    - » ROW patrol

- Specific circumstances relating to patrolling and leakage
- Potential for, or evidence of, soil or water accumulation in vaults or pits

Periodic review and analysis of records, such as the following:

- Patrols
- Leakage surveys
- Valve inspections
- Vault inspections
- Pressure regulating, relieving and limiting equipment inspections
- Corrosion control inspections
- Facility failure investigations

Field employees must consider the possibility that service line records, maps and other records may be inaccurate, particularly for older pipeline systems. If you encounter inconsistencies between records and field observations they should be more fully investigated to protect public safety by taking action. Actions can range from additional record reviews to physical excavation. Discrepancies in records shall be corrected when identified.

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- OQ Task Specific AOCs...

The following list contains AOCs related to this OQ Task. Be advised that this is not a complete listing. Always be aware of safety and hazard recognition in the workplace.

Form GS 1652.010-1 "Facility Failure Report" shall be submitted for failures on components that are part of an in-service pipeline facility.

RECOGNIZE:		REACT:
Pipeline markers that are improperly located.	➲	Install new markers as needed.
When required pipeline markers are missing.	➲	Install new markers as needed.
Damaged, missing or unreadable markers.	➲	Re-label or replace as needed.
Unable to locate using pipeline locator.	➲	Notify appropriate personnel to verify and update location.
Inaccurate records.	➲	Notify appropriate personnel and update records according to Gas Standards.

Field employees must consider the possibility that service line records, maps and other records may be inaccurate, particularly for older pipeline systems. If you encounter inconsistencies between records and field observations they should be more fully investigated to protect public safety by taking action. Actions can range from additional record reviews to physical excavation. Discrepancies in records shall be corrected when identified.

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- *Documenting Discontinued Service...*

Record the necessary information on the DIS Order, Form C-2650-34, "Shut Off Order," or the Mobile Data Terminal, as applicable.

Abandon Service Lines[4]

Service line meters and premises are classified as inactive or active. A service line, meter and premise status is classified as ***inactive*** when the meter valve and/or curb valve is turned off and the meter is not removed from the meter set assembly. For manifold settings, only one inactive meter must remain for the master service line (PSID) to be classified as inactive. An ***inactive*** service line is considered to have a prospect for future use.

A service line and premise status are classified as idle when the meter of a single meter set assembly or the last remaining meter of a manifold setting has been removed.

A service line and premise status are classified as New Service Line (NSL) during the time interval between the service line installation and execution of the New Set Meter Order.

A service line is classified as abandoned when it has been physically separated from the main and plugged or sealed.

Field employees must consider the possibility that service line records, maps and other records may be inaccurate, particularly for older pipeline systems. If you encounter inconsistencies between records and field observations they should be more fully investigated to protect public safety by taking action. Actions can range from additional record reviews to physical excavation. Discrepancies in records shall be corrected when identified

- ***Conditions Requiring Abandonment.*** Service lines shall be abandoned not later than the end of the 60th month from either the date that the gas service was discontinued, or when the service line was placed in service for a service line that has not had a meter installed.

- *Discontinuing Gas Service[1]...*

When discontinuing service at the request of a customer during the heating season, if there is a possibility of freeze damage, every effort should be made to determine if service can be continued in the owner's name. Good judgment must be exercised to avoid Company liability.

When gas is "Left on for Heat," the person making the disconnect shall note it on the DIS Order or Form C-2650-34, "Shut Off Order," and return it to the office for follow-up.

Before discontinuing service to the customer, review the DIS order to verify the following:

- Customer's name and address
- Meter serial number and current meter reading

Field employees must consider the possibility that service line records, maps and other records may be inaccurate, particularly for older pipeline systems. If you encounter inconsistencies between records and field observations they should be more fully investigated to protect public safety by taking action. Actions can range from additional record reviews to physical excavation. Discrepancies in records shall be corrected when identified.

Gas Turned Off at Meter Valve Only.

On domestic meters, seal the meter valve and install a metal disc or solid swivel at the inlet connection to the meter. For large volume meters, the meter valve shall be sealed or locked.

Gas Turned Off at Curb and Meter Valves.

- Be sure the correct curb box is identified before shutting off the valve. If there is doubt that the correct curb valve has been turned off, it may be necessary to bleed gas off at the meter or burn gas off at an appliance.
- On domestic meters, seal the meter valve and install a metal disc or solid swivel at the inlet connection to the meter. For large volume meters, the meter valve shall be sealed or locked.

NiSource
Distribution Operations

Gas Standard

Effective Date: Xx/xx/2018	**Abandonment of Facilities**	Standard Number: **GS 1740.010(OH)**
Supersedes: 07/01/2014		Page 1 of 6

Companies Affected:	☐ NIPSCO	☐ CVA	☐ CMD
		☐ CKY	☒ COH
		☐ CMA	☐ CPA

REFERENCE 49 CFR Part 192.727

1. GENERAL

This standard shall apply to the abandonment or deactivation of pipeline facilities.

An inactive pipeline not being maintained by the Company shall be abandoned.

2. DISTRIBUTION MAINS AND TRANSMISSION LINES

When it has been determined that a distribution main or transmission line (pipeline) has no reasonable prospect for future use, it shall be scheduled for retirement.

Each pipeline abandoned in place must be disconnected from all sources of gas supply, purged of all gas, and the ends sealed.

2.1 Written Plan

Field Engineering shall prepare a written plan to accomplish the work, ensuring proper supply is maintained to the parts of the system to remain in service, and gas to the pipeline to be abandoned is properly stopped by disconnecting all sources. If the plan requires modification prior to being executed, it shall be reviewed and approved by the preparer.

The written plan shall identify the method for stopping the gas flow from the sources. Typical methods include the use of valves, squeezers, stoppers, or bag(s). Alternate methods for each source should be identified in case the planned method cannot accomplish stopping the gas, such as inoperable valves or conflicts with other underground facilities.

The following actions should be considered when developing the written plan.

a. Installing gauge(s) to monitor upstream pressure before stopping the gas.
b. Installing fittings for pressure verification and gas venting.
c. Stopping gas from all sources.
d. Venting to allow pressure to decrease in pipe being abandoned.

of future use by the end of the 24th month from the day the gas service was discontinued. If no prospect for future can be determined, then the service line shall be abandoned.

Service lines that have not had a meter installed (e.g., NSL classification for CDC) should be evaluated for the prospect of future use by the end of the 24th month from the date the service line was placed in service. The service line shall be abandoned if it is determined that the service line has no prospect for future use or before the Company's state regulatory required maximum length of time to abandon it, whichever occurs first.

Service lines shall be abandoned not later than the end of the 60th month from either the date that the gas service was discontinued, or when the service line was placed in service for a service line that has not had a meter installed.

3.2 Abandoning Service Lines

When abandoning service lines, the piping must be disconnected from the gas supply and customers' house lines, and the abandoned pipe end(s) sealed. This should be accomplished similar to the procedure in Section 2, with the following exceptions.

a. A written plan is not needed.

b. Verification and venting can be accomplished by aboveground piping at a meter setting.

c. Natural venting is normally sufficient to purge a service line that is being abandoned. However, a service line being abandoned shall be purged with a purging medium if natural venting is not effective.

d. The service line should be disconnected as close as practical to the supplying pipeline, so that the remaining live service line stub does not exceed 18" in length from the outside edge of the distribution main or transmission line to the dead-end cap on the service line stub.

   If extenuating conditions result in a live service line stub that extends beyond 18" from the outside edge of the distribution main or transmission line, job order comments shall include an explanation for exceeding the 18" length and a map revision shall be submitted in accordance with GS 2610.040 "Map Revisions" to map the remaining live service line stub within the Company's Geographical Information System (GIS).

~~d.~~e. Where a service line enters below grade through a basement wall, the end of the service line should be plugged and capped as close to the face of the wall as practical. It is not necessary to remove pipe from the wall unless required by particular circumstances.

f. Aboveground piping and fittings, such as a measurement setting, should be removed unless attached to a structure.

e.g. Prior to working a paper abandonment (i.e., 566 job order for a meter abandonment on a manifold meter set assembly or split service for the sole purpose of retiring a PSID), a site visit shall be performed to review visible facilities, including all associated accounts, compared to existing Company records (e.g., Service Line Data, SLR form, SLO, GIS). Inconsistencies shall be investigated and records shall be corrected, in accordance with GS 3020.012 "Service Line Records," prior to executing the job order.

Where positive-stop tapping tees exist, it is preferred to stop the gas flow with the positive-stop tapping tees and cap the outlet of the tees. If the "punch" or "cutter" of positive-stop tapping tees is used to affect the disconnection at the main, the "punch" or "cutter" shall be retracted until even with the top of the tees before replacing the tee caps.

Where the tapping tees do not have a positive stop, the outlet piping of plastic tees can be squeezed and some steel tees can have the gas stopped in the tee body, such as by pinning with a metal rod or wooden dowel. The connected piping can then be cut and the outlet of the tee capped.

Other methods to abandon service lines, such as plugging saddles or installing clamps on the main, can be used.

If service lines are abandoned in conjunction with the abandonment of the supply pipeline, the service lines do not need to be disconnected from the pipeline and no venting of the service line is required if the volume of gas in the line is not considered potentially hazardous.

When service lines are abandoned, curb boxes (if they exist) shall be removed and the hole filled with a suitable compacting material. If the curb boxes cannot be removed due to their location in concrete or pavement, the curb box lids shall be removed and the curb boxes filled with concrete or similar material.

4. VAULTS

Each abandoned vault must be filled with a suitable compacting-type material. While filling the vault, ensure that the material flows into all areas so that no voids remain. If necessary, the material can be tamped while filling to achieve some initial compaction.

As an alternate to abandoning a vault, it could be removed and the space previously occupied filled as a typical excavation. All proper safety precautions must be followed considering the depth and all other factors of the work.

5. ABANDONMENT OF PIPELINE FACILITIES INVOLVING COMMERCIALLY NAVIGABLE WATERWAYS

If the pipeline facility abandoned is an onshore pipeline that crosses over, under, or through a commercially navigable waterway, a report must be prepared and submitted by either of

the following methods.

5.1 Submit Report to the National Pipeline Mapping System (NPMS)

The preferred method to submit data on pipeline facilities abandoned is to the National Pipeline Mapping System (NPMS) in accordance with the NPMS "Standards for Pipeline and Liquefied Natural Gas Operator. A digital data format is preferred, but hard copy submissions are acceptable if they comply with the NPMS Standards.

In addition to the NPMS-required attributes, the Company must submit the date of abandonment, diameter, method of abandonment, and certification that, to the best of the Company's knowledge, all of the reasonably available information requested was provided and, to the best of the Company's knowledge, the abandonment was completed in accordance with applicable laws.

Refer to the NPMS Standards for details in preparing data for submission.

5.2 Submit Report to the PHMSA Information Officer

Alternatively, the Company may submit reports by mail, fax or e-mail to the Information Officer, Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, Information Resources Manager, PHP-10, 1200 New Jersey Avenue, SE., Washington, DC 20590-0001; fax (202) 366-4566; e-mail InformationResourcesManager@phmsa.dot.gov.

The information in the report must contain all reasonably available information related to the facility, including information in the possession of a third party. The report must contain the location, size, date, method of abandonment, and a certification that the facility has been abandoned in accordance with all applicable laws.

6. RECORDS

Abandoned facilities shall be included on the applicable work completion report for the retirement.

Abandoned service lines shall be documented in accordance with GS 3020.012 "Service Line Records."

NiSource
Distribution Operations

Gas Standard

Effective Date: Xx/xx/2018	**Emergency Response – General Guidelines**	Standard Number: **GS 1150.010**
Supersedes: 4/11/2014		Page 1 of 3

Companies Affected:	☐ NIPSCO	☒ CVA	☒ CMD
		☒ CKY	☒ COH
		☐ CMA	☒ CPA

REFERENCE 49 CFR Part 192.615

1. SCOPE

The primary role, as a first responder, is to make the situation safe in order to prevent injury to persons or damage to property.

These guidelines provide a reference for employees taking action in response to an emergency involving gas facilities. During emergency response, employees must follow all applicable state or federal guidelines, as well as company policies and procedures. All employees must be aware of their qualifications that enable or limit their performance of necessary tasks during an emergency and act accordingly.

Appropriate Personal Protective Equipment (PPE) should always be utilized. Follow all safety procedures when a leak investigation leads to an underground vault or other confined space.

2. GENERAL GUIDELINES

If immediate emergency assistance is needed, request the Company's dispatch center[1] to make the first emergency contacts. In the event such contact cannot be made by the dispatch center, the first responder on site may call fire, police or other emergency services directly using 911.

Record arrival time and report any significant initial observations to the dispatch center such as evidence of fire, explosion, evacuations, police or fire department on the scene, blowing gas, damaged gas facilities, road closings, strong odor of gas, and other external hazards such as damage to other utilities or structures.

Direct all news media inquiries to local Supervision and/or Communications.

[1] Depending upon the Company, the dispatch center refers to either the Work Management Center (Indiana) or the Integration Center.

2.1 Determine if a Hazardous Situation Exists

Determine if a hazardous situation exists based on the following conditions.

a. Eescaping or uncontrolled gas;.
b. Rresults from tests made with leak detection equipment;.
c. Llocation of escaping gas and its migration, (follow company procedure for gaining access). ~~, and/or~~
d. Oother conditions observed at the scene of the reported emergency.

2.2 Determine What Actions Are Necessary

Determine, based upon Company procedures, what actions are necessary to make the condition safe, such as the following.

a. Evacuate.
    1. Coordinate with fire department if they are on the scene.
    2. Make sure buildings are secure to prevent re-entry.
    3. Communicate with evacuees the procedure for re-entry.
b. Direct occupants and bystanders away from the area.
c. Eliminate ignition sources including electric service (Refer to GS 1770.010 "Prevention of Accidental Ignition" for additional guidance).
d. Promptly Ccontrol escaping gas (e.g., by stopping the flow of gas by closing valves or other means).
e. Ventilate affected buildings.
f. Purge or vent outside leakage (e.g., by removing manhole covers, bar holing, installing vent holes or other means).
g. As needed, establish and monitor the perimeter and check for migrating gas.
h. Notify fire, police or others on site that you are from the gas company and determine who is in charge at the site.
i. Take efforts not to disturb potential evidence at the scene of the fires, explosions and breaches of security.
j. Continue to assess the situation. Update Supervision or the dispatch center and indicate what assistance may be needed.
k. As needed, call for facility locates.
l. As needed, ask fire or police for assistance in controlling traffic.
m. If a line marker or sign is found on-site that indicates another gas pipeline

ATTACHMENT C

ATTACHMENT D

3550 Johnny Appleseed Court
Columbus, Ohio 43231

Direct: 614.818.2110
rrsmith@nisource.com

Columbia Gas® of Ohio
A NiSource Company

November 14, 2018

Mr. Peter Chace
Manager of Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

RE: Columbia Gas of Ohio, Inc.
Compliance Order
4149 Case Road, Avon, Ohio

Dear Mr. Chace:

This letter responds to the Compliance Order dated August 16, 2018, and received by Columbia Gas of Ohio, Inc. ("Columbia") on August 23, 2018. The Compliance Order arises from an incident at 4149 Case Road in Avon, Ohio on August 2, 2017 (the "Incident").

Pursuant to the Compliance Order, the following must be completed by **Wednesday, November 14, 2018**:

> *1: Columbia should perform a review of excavation damages with a reported cause of "Locating Practices Not Sufficient" for the purpose of identifying what parts of the Columbia system are more likely to experience problems with insufficient or inadequate records.*

Columbia's Response:
Columbia has reviewed its excavation damages due to the poor records root cause. Columbia has attached a heat map showing these areas with data from 2015 through September 2018, which is attached hereto as **Appendix A.**

2: Columbia should review and update its current procedures for identifying high-risk one-call tickets. Tickets in portions of the Columbia system with a higher relative risk of incomplete and/or inaccurate records should be marked by more experienced locators that can better recognize inconsistencies in the field.

Columbia's Response:
Columbia sends one-call tickets to be located in the field. When an inconsistency is found during the locate, including an inconsistency with maps and records, Columbia's second-party locate contractors escalate the locate to more experienced personnel to locate Columbia's facilities in this area. In the event the second-party locate contractor cannot locate the main or service, Columbia's internal personnel will be sent to the field to locate Columbia's facilities.

Columbia also utilizes its Damage Prevention Risk Model ("DPRM") to risk rank one-call tickets that it receives. Columbia incorporates poor records into this algorithm to ensure that its risk-ranking system identifies high-risk tickets in areas where Columbia has been experiencing damages due to poor records. Columbia's Damage Prevention Specialists ("DPS") utilize DPRM to conduct in-field QA/QC on high risk tickets. In 2018, year-to-date, Columbia's DPS has conducted 2,800 in-field audits.

Columbia is also sharing the heat map in **Appendix A** with its one-call locators, both in-house and second-party locate contractors, as well as Columbia's Damage Prevention Specialists.

Finally, as Columbia's second-party locate contractor agreements expire at the end of 2019, Columbia will commit to look for ways to incorporate more experienced locate personnel in areas where it has previously experienced damages due to poor records.

Should you have questions or need additional information please contact me at 614-818-2110.

Sincerely,

Rob Smith
Operations Compliance Manager
Columbia Gas of Ohio, Inc.

Summary: Stipulation Joint Stipulation and Recommendation electronically filed by Ms. Tonnetta Scott on behalf of PUC