

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or the Company), pursuant to the Commission’s November 3, 2016 Opinion and Order adopting the Pipeline Safety Management Program (PSMP), respectfully submits its annual report detailing DEO’s PSMP-related expenses deferred in calendar year 2018 and a description of activity in 2018 on PSMP initiatives. In support of its annual report, DEO states as follows:

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

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

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

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

- **Attachment A:** Schedule of Deferred Costs for the Twelve Months Ended December 31, 2018
- **Attachment B:** Report Prepared by DEO's Independent Auditor
- **Attachment C:** Programmatic Review of PSMP Initiatives for 2018

5. The programmatic review contains various metrics, statistics, and other measures to assist in gauging and improving the effectiveness of these programs. (*See* Application ¶¶ 9–10 (Oct. 1, 2015).) The PSMP metrics, statistics, and other measures continue in various states of development, but are expected to be more fully established as implementation of the PSMP progresses. Efforts to identify appropriate baselines continue as the PSMP initiatives are developed and implemented. In accordance with the stipulation and application, the measures are subject to change based on further internal review and discussions with Staff. As the Company gains additional experience implementing and analyzing the programs, including newly available data, it may be determined that new or refined metrics provide better measures of program effectiveness.

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

WHEREFORE, DEO respectfully submits this annual report for Commission Staff's review, and requests a recommendation that all 2018 PSMP-related expenses be deferred.

Dated: May 31, 2019

Respectfully submitted,

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(Counsel willing to accept service by email)

ATTORNEYS FOR THE EAST OHIO GAS
COMPANY D/B/A DOMINION ENERGY OHIO

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Annual Report was served by electronic mail this 31st day of May 2019 to the following:

Thomas Lindgren
Office of the Ohio Attorney General
Public Utilities Section
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/s/ Christopher T. Kennedy
One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion Energy Ohio

Attachment A

[illegible]

Attachment B

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

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

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

We have performed the procedures enumerated below which were agreed to by The East Ohio Gas Company d/b/a Dominion Energy Ohio (a wholly-owned subsidiary of Dominion Energy, Inc.) (“DEO”, the “Company”, or “you” or “your”) and Dominion Energy Inc. (collectively, the “Companies”) solely to assist the Company and the Public Utility Commission of Ohio (the “PUCO”) (collectively, “the specified parties”) with respect to the PUCO’s evaluation of the Company’s compliance with PUCO Case No. 15-1712-GA-AAM in conjunction with the balance of accumulated cost deferrals for the Pipeline Safety Management Program (“PSMP”) for the period January 1, 2018 through December 31, 2018. The Company’s management is responsible for the Company’s compliance with these requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

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

1. We obtained from Company management the detail of the PSMP cost deferrals by month for the period from January 1, 2018 to December 31, 2018 and agreed the total deferrals to the Company’s summary schedule to be filed with the PUCO as part of the annual report, and performed the following procedures:
 - a. Remove all prior year (2016 – 2017) PSMP activity from current year totals. Agree the remaining activity to the change in the 2018 PSMP cost deferrals by agreeing the detail obtained in Step 1 above to account 1242153 (PSMP Deferral) in the Company’s general ledger and by adding the difference between the December PSMP deferral estimate and December PSMP deferral actual costs within account 1242153.
 - b. Agree the beginning balance of the PSMP deferral summary schedule of deferrals by month, to the beginning balance of the 2018 PSMP deferral account 1242153, and the difference between the December 2017 PSMP deferral estimate and PSMP actual deferrals.
 - c. We haphazardly selected 3 months included in the detail obtained in Step 1 above. For each month selected, we haphazardly selected 5 individual cost line items from the

activity detail (15 total selections) and agreed the cost included in the detail to supporting documentation for each selection.

- i. Selected 14 labor charges and recalculated the total charges selected by multiplying the total hours charged by the employee to a PSMP-related WBS code by the employee's activity rate without exception. We agreed the total hours charged to the WBS and the employee's activity rate to the Company's payroll system and found them to be in agreement. We inspected the Company's records and determined that the selected employees were assigned to a PSMP-eligible position.
 - ii. Selected 1 contractor service charge and agreed the selection to a third-party invoice by multiplying the hours charged by the service rate and found them to be in agreement.
 - iii. No vehicle expenses were included in the 15 haphazard selections made.
2. We obtained from Company management the monthly detail of the carrying charges included in the PSMP cost deferrals for the period from January 1, 2018 to December 31, 2018 and performed the following procedures:
 - a. We agreed the monthly detail of the carrying charges to the total carrying charges included in the detail obtained in Step 1 above and found them to be in agreement.
 - b. We haphazardly selected 3 months and recalculated the monthly carrying charges for the selected months without exception by multiplying the Company's average of the monthly beginning and ending balance by the Commission approved three percent per annum rate without compounding.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on the Company's compliance with PUCO Case No. 15-1712-GA-AAM in conjunction with the balance of accumulated cost deferrals for the PSMP for the period January 1, 2018 through December 31, 2018. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

Deloitte & Touche LLP

May 31, 2019

Attachment C

Dominion Energy Ohio

2019 Pipeline Safety Management Program (PSMP)

Annual Report

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Introduction

Dominion Energy Ohio (DEO) continued to make significant strides in enhancing its Pipeline Safety Management Programs (PSMP) during 2018. DEO implemented several key actions, which are discussed more fully below, to meet or exceed the PUCO and Company's own expectations.

DAMAGE PREVENTION INITIATIVES

As set forth below, there was a slight increase in the "Damages per one thousand tickets" metric in 2018. Based on its review, DEO believes that this increase may be attributed to several factors:

- The Damage Investigation Program was launched in August 2018. Through implementation of this Program, resources are now devoted to investigate all excavation damages. DEO believes that this is resulting in a more accurate assessment of total damages occurring on its system.
- In addition, DEO has improved several processes to better recognize and incorporate into the metric 2nd party damages (damages caused by DEO contractors).
- In 2018, DEO experienced an increase in fiber optic jobs in its service territory. This resulted in a 36% increase in damages resulting from horizontal direction drilling [from 2017 to 2018]. DEO personnel met with these excavators to reiterate and educate on damage prevention processes.

Given the impact of the Damage Investigation Program on this metric, and the continued focus on recognizing 2nd-party damages, DEO is considering whether 2019 may provide the proper baseline for the "Damages per one thousand tickets" metric.

Unconventional Locate Expert Program

In 2018, DEO continued its efforts with the Unconventional Locate Expert Program. DEO added a third crew from United States Infrastructure Corporation, LLC (USIC) that was solely dedicated to the unconventional locate efforts. DEO implemented a new tool called the Jameson Tool, which is a traceable rod that is inserted into the service riser and is fed the length of the service line allowing for the service line to be located. Also, DEO continued working with USIC to manage the metrics and track improvements in the accuracy of locating service lines and reduction in excavation damages resulting from this program.

Metrics¹:

Metric	2016	2017	2018
Damages per one thousand tickets	3.28	2.99	3.04
Tickets sent to unconventional crews		707	2,330
Service lines assessed through unconventional program		503	1,837
Service lines successfully located		405	1,569
Percentage of successfully located services		80.5%	85.4%
High profile services located		242	1,262
Number of Service Line Data Sheet (SLD) opportunities		319	1,315
Number of SLDs completed		255	1,178
SLD completion rate		79.9%	89.6%
Damages on assessed service lines		0	6

Enhanced Excavation Monitoring Program

In 2018, DEO continued the Ticket Risk Assessment (TRA) program with eight (8) full-time TRA technicians from USIC/RECON fully dedicated to the program. DEO continues to refine the program, including by evaluating the damage data and geographically realigning the resources to areas that experienced higher damage rates. Also, DEO continued working with USIC/RECON to manage the metrics and track improvements with the goals of gathering more data on high risk contractors and working to improve their damage rates.

Metrics:

Metric	2016	2017	2018
Damages per one thousand tickets	3.28	2.99	3.04
Tickets assessed through risk algorithm		165,607	249,861
Percentage of tickets with risk probability score ≥ 5.0		10.8%	10.0%
Tickets monitored by TRA technician		5,892	14,069
Percentage of tickets with risk probability score ≥ 5.0 monitored by TRA technician		29.7%	49.6%
Total damages on tickets with risk score ≥ 5.0		171	337
Total number of damages w/ TRA technician on site		51	149
Damage ratio on tickets with a risk score ≥ 5.0		9.60	11.95
Damage ratio w/out utilizing a TRA technician		10.07	13.23
Damage ratio w/ utilization of TRA technician		8.66	10.64

¹ Here and throughout the report, the baseline metric for each initiative is identified as the first metric recorded for each individual metric.

Damage Investigation Program

In August 2018, DEO launched the Damage Investigation Program. DEO hired four (4) full-time Damage Prevention Specialists for the purpose of working with Operations, USIC and excavators to conduct root-cause investigations of excavation damages. Along with conducting root-cause investigations, the Damage Investigation team has been conducting field audits of USIC. DEO has also been engaging with other peer companies to identify best practices for locating tracer wire. The information that results from the investigations, audits and best practices will be used to identify opportunities for continuous improvement that will help reduce excavation damages.

With this dedicated team of damage investigators conducting root cause analysis on excavation damages, DEO identified and implemented the following process improvements for 2019:

- Updated the low pressure (LP) and medium pressure (MP) untoneable procedures.
- Developed on-time performance reports from USIC that are submitted daily to DEO.
- Developed internal reports to verify the accuracy of the USIC reports.
- Implemented a locator discrepancy investigation procedure.

In 2018, DEO began developing a database that tracks and manages all investigations completed by the Damage Investigation team. This database will be fully implemented in 2019; moving forward, investigations will be stored, facilitating extraction of analyses and reports.

Metrics:

Metric	2016	2017	2018*
Damages per one thousand tickets	3.28	2.99	3.04
Number of damages			530
Investigations completed			530
Investigations completed w/in 30 days			530
Percentage of investigations completed w/in 30 days			100.0%
Number of field investigations conducted			75

**Data is from August 1, 2018 to December 31, 2018*

Enhanced Leak Survey Program

In 2018, DEO continued with its Enhanced Leak Survey Program by leak surveying high-pressure distribution lines located outside of business districts. Results of the leak surveys will be analyzed in 2019 to determine the effectiveness of the program moving forward.

Metrics:

Metric	2017	2018
Total miles of HP distribution pipelines leak surveyed	377.1	411.8
Number of Grade 1 leaks discovered	0	0
Number of leaks confirmed on HP distribution	31	9

Enhanced Excavator Communication and Training

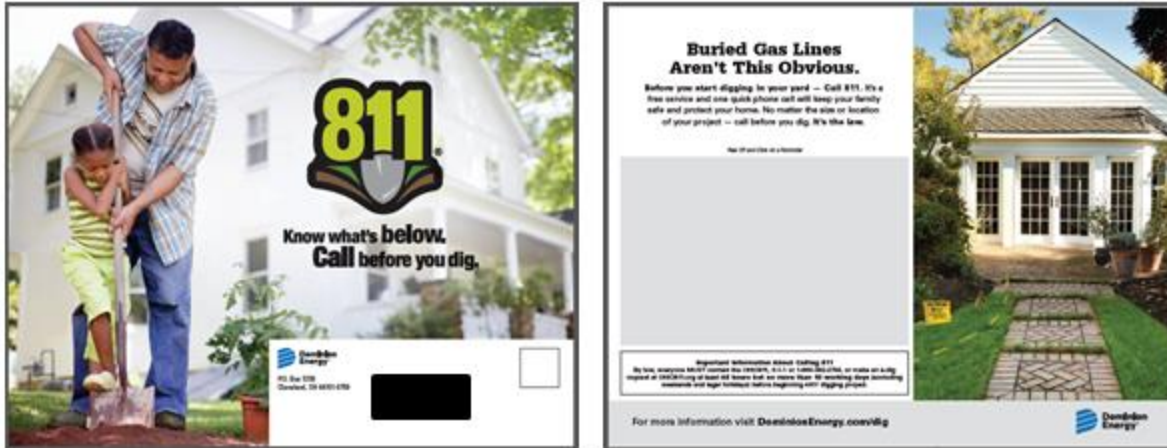
In 2018, DEO continued the programs that were launched in 2017 and began a program that targeted the areas with highest damage rate through increased communications, public-awareness initiatives, and mailers. These programs are detailed below:

- Cleveland Indians – 8-1-1 “Call Before You Dig” Campaign
 - Indians’ Radio Network
 - 162 live network read spots
 - 83,600 age 18+ average nightly listeners
 - Aired on WTAM 1100 and WMMS 100.7 simulcast and across the entire Indians’ Radio Network (18 AM stations and 9 FM stations)

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

- In-Park Digital
 - Upper LED signage at Progressive Field
 - 83 half-inning spots
- Outfield Wall Signage
 - Entire 2018 season
 - 1,293 exposures (national and local television)
 - QI Media Value - \$192,402

- Prominent in park presence
 - 2018 Cleveland Indians regular season attendance: 1,926,701
- National Excavator Initiative (NEI) – DEO continued its support of the National Excavator Initiative. In 2018, NEI delivered the following:
 - Developed and produced a *“Digging – Comes in all Shapes and Forms”* state-specific API RP 1162 compliant booklet distributed and mailed to over 665,000 excavators in 26 states in English and Spanish.
 - Safe Excavator App for iPhone and Android systems
 - Identifies state-specific requirements for excavation in an easy-to-understand format
 - Connects electronically to make a one call request
 - Lists how to contact state one call centers
 - Provides supporting operators emergency and general contact information
 - API RP 1162 required messages on: leak recognition, release response, and reporting damage.
 - Safe Excavator Website (www.safeexcavator.com)
 - Contains state laws by topic
 - Education videos
 - Safe digging checklist
 - The National Excavator Initiative Videos Featuring Mike Rowe
 - Three (3) short videos of 2-3 minutes in length
 - Six PSAs – three (3) 30-second PSAs and three (3) 15-second PSAs
- Public Opinion Strategy (POS)
 - DEO focused on areas that had the highest damage rate arising from the lack of a one-call ticket and identified the top 12 (“Dirty Dozen”) zip codes, which resulted in a targeted mailing campaign.
 - Target 8-1-1 “Call Before You Dig” Mailing – in an effort to reduce damages to underground facilities, an 8”x10” mailer was designed, produced and mailed to customers living within these identified areas.
 - An 8-1-1 peel and stick placard was also created to reinforce the 8-1-1 message.
 - 138,059 – 8”x10” postcards were mailed in December 2018
 - 52,000 – peel and stick placards were included in new customer packets



- Paradigm Collaborative Program
 - Increased pipeline safety public awareness to targeted stakeholder groups with a stakeholder-specific brochure, an operator profile, and a business reply survey.

Metrics:

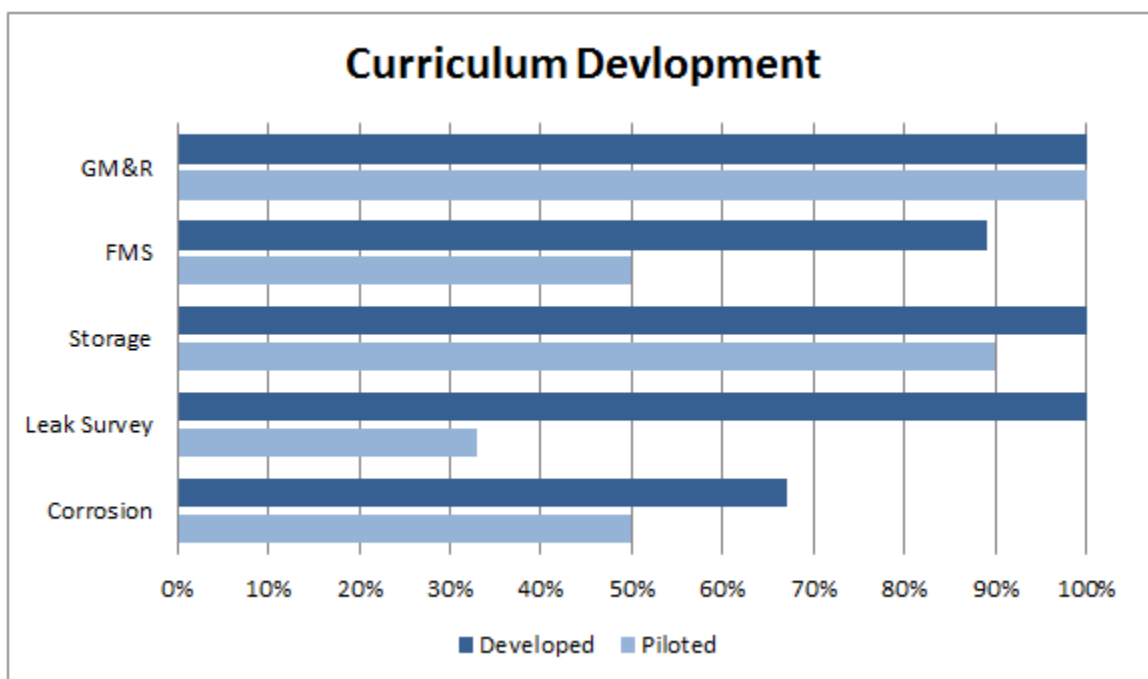
Paradigm Collaborative Program Effectiveness Measures

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

ADVANCED WORKFORCE TRAINING INITIATIVE

In 2018, DEO continued implementing the comprehensive workforce training strategy in partnership with Mosaic. Below are the milestones reached in 2018 for each of the five work streams:

- Instructor Development
 - Continued implementation of the comprehensive Instructor Development Plan, including:
 - Training from Friesen, Kaye and Associates on facilitation skills, classroom coaching skills and adult learning methodologies.
 - Deployed pilot for training observation form (TL&DS Delivery Observation Form).
- Training Development Production Process
 - Continued to adhere to Style Guide and development processes to document training materials for new curricula.
- Technology
 - Continued implementing Survey Monkey, Xyleme, Questionmark, Performance Support and the Advanced Workforce Training System.
- Curriculum Development
 - Completed pilots for the Gas Measurement and Regulation (GM&R) curriculum.
 - Developed the Field Metering Services (FMS) & Emergency Response and Storage curricula, which includes scenario-based activities allowing for the full utilization of Technical Training facilities areas (*i.e.*, Training Town and Flow Lab).
 - Completed Leak Survey and Corrosion task analysis and began developing content for both.
- Structured On-the-Job Training (S-OJT)
 - Identified on-the-job training tasks and appropriate repetitions for FMS & Emergency Response and Storage.
 - Created skills checks for FMS & Emergency Response and Storage OJT tasks.

Metrics:


	GM&R		FMS		Storage		Leak Survey		Corrosion	
Metric	2017	2018	2017	2018	2017	2018	2017	2018	2017	2018
Total number of training hours developed	179	8		174		84		36		36
Total number of job aids created	139	5		112		106		52		40
Number of employees completing training courses		6								
Average score of knowledge assessments		94.1%								

Metric		2017	2018
Instructional Effectiveness	Surveys completed in Survey Monkey	314	289
	Survey completion percentage	23%	22%
	Respondents Agree or Strongly Agree that content supports their learning experience		89%
	Respondents Agree or Strongly Agree that instructor was knowledgeable		98%
Technology Tools	Number of employees utilizing the electronic Help & Support tools	8	38
Training Facility Completion	Training Town	50%	80%
	Flow Labs	80%	90%

ASSET DATA COLLECTION

In 2018, DEO focused on three primary components of the Asset Data Collection initiative: Asset Data Strategy, Data Governance and MAOP Validation.

Asset Data Strategy (ADS)

The ADS team focused its 2018 efforts in three main areas:

- Initiated the development of an asset data governance program.
- Initiated several GIS projects:
 - Performed data mapping of DEO GIS assets from GE Smallworld to the Esri ArcGIS for use with Esri's internal web based GIS service, Portal. Esri Portal will expand accessibility and configurability of mapped asset information to personnel that work in the field while also expanding asset data analytical capabilities in the office. Implementation of the Esri Portal will provide GIS view access to field employees who currently have no GIS access. In addition, GIS mobile users will have custom views by department, including or excluding information as requested. The first wave of Portal's deployment is projected to be the 2nd quarter of 2019.
 - Landbase and conflation project to improve positional accuracy of GIS assets and replace existing GIS landbase with a commercially available landbase. Conflating the GIS system will allow for more efficient usage of GPS coordinates collected in the field. The Conflation project began in early 2019. Phased implementation based on geographic location is scheduled to begin in the 3rd quarter of 2019 with anticipated project completion in 2nd quarter of 2020.
- Completed a construction mobile software assessment to provide comparisons of several commercially available solutions to be used to capture construction data, including data for tracking and traceability and GPS based location information.

Metrics: Metrics identified for Asset Data Strategy are shown below. Because the ADS component is still being developed and not yet fully implemented, the baseline will be the first full year preceding implementation. Metric baselines will be reported back in subsequent years and the metrics will continue to be evaluated as this program is deployed.

Metric		2016	2017	2018
Average days to final update of mapping in GIS after construction is complete		71	79	62
Percentage of new construction facilities mapped to the GIS with complete data		94.9%	99.6%	99.4%
DOT Report	Miles of main with unknown decade of installation	94.40	88.93	83.06
	Number of services with unknown material	462,858	451,137	439,631
	Number of services with unknown size	676,992	665,729	655,475
	Number of services with unknown decade of installation	607,700	602,719	595,506
	Miles of transmission with unknown decade of installation	0.37	0.36	0.32
	Miles of Gathering Type B with unknown decade of installation	10.18	10.18	9.91

Asset Data Governance

Data Governance involves setting processes, policies, procedures and standards in place to ensure data is correct, consistent and sustainable across the organization. Data governance encompasses people, processes and information technology required to create to a consistent and proper handling of an organization's data. Dominion intends to leverage data governance to formalize asset data behavior that will support the collection, defining and usage of data to improve quality and usability of the data. Formalizing and guiding behavior to leverage shared data will provide for improved business decisions.

In 2018, DEO initiated Data Governance for gas infrastructure data; including establishing data ownership and providing an operating framework for the Data Governance roles and processes. A full-time position of Data Quality and Governance Specialist was created and filled in the first quarter of 2018. An evaluation of Data Governance software as a permanent support tool for the program was also started and led by the DEO Data Quality and Governance Specialist. DEO also began the creation of an asset data catalog, which consists of identifying activities and datasets and defining the fields for each asset data form.

Metrics: The metrics below are distinct to the creation of the data catalog. As the program matures and software is implemented, additional metrics will be defined with a focus on metrics surrounding data quality.

Asset Data Catalog

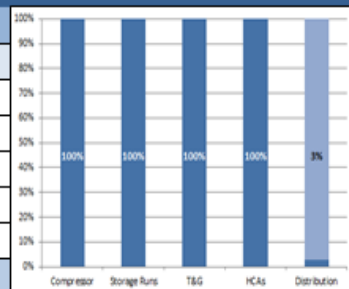
Metric		2018
Activities	Number of activities collected	306
	Percentage of activities cataloged	100%
Datasets	Number of datasets collected	857
	Percentage of datasets cataloged	100%
Defined Fields	Total number of fields identified	16,105
	Number of fields defined	6,764
	Percentage complete	58%

MAOP Validation

In 2018, DEO continued its review of MAOP data to ensure traceable, verifiable and complete (TVC) data for all Transmission, Storage, Gathering and Distribution stations, as well as Transmission and Storage pipeline systems. In 2018, DEO completed the TVC validation of all of the Transmission, Storage and Gathering (TS&G) stations. Also in 2018, Distribution station MAOP validation began in earnest and will continue, along with Transmission and Storage pipeline systems, through 2019 and beyond.

Metrics:

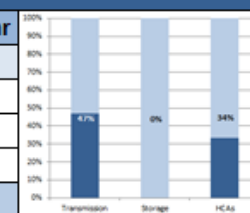
Transmission, Storage & Gathering (TSG) & Distribution Stations						
Station Type	Baseline*		Completed by Year			
	Completed	Remaining	2015**	2016	2017	2018
Compressor Stations	22	0	0	7	11	4
Storage Runs	141	0	71	70	0	0
T&G Stations	195	0	25	71	73	26
HCA's (subset)	70	0	52	18	0	0
Distribution	63	2219	-	-	-	63
Total:	421	2219	96	148	84	93



*Baseline is the total number of stations identified for review

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

Transmission & Storage Pipeline Systems				
Pipeline Type	Baseline*		Completed by Year	
	Completed	Remaining	2017	2018
Transmission	371	420	317	54
Storage	0	232	0	0
HCA's (subset)	47	93	36	11
Total:	371	652	317	54



*Baseline is the total number of pipeline miles identified for review

QUALITY ASSURANCE

In 2018, DEO continued implementing the Quality Assurance program. DEO published a Quality Management Plan that outlines the scope of the program, the different types of assessments that will be conducted and the frequency in which the assessments will be conducted. The plan also defines the difference between Quality Assurance and Quality Control assessments. The plan established that Quality Assurance is the task of assessing procedures and policies to ensure compliance with company procedures and state and federal regulations. Quality Control, as defined by the plan, is the act of evaluating contractor and employee work through field assessments for adherence to established policies and procedures. Also in 2018, DEO hired two full-time employees dedicated to the Quality Assurance program.

DEO launched its program by conducting and piloting quality assurance assessments focusing around internal audits (of both shop and program) and issue management assessments. Issue management assessments, as defined by the Quality Management Plan, are assessments intended to ensure that commitments made to regulatory agencies are being completed in a timely manner.

Metrics: When assessing documentation, a score of satisfactory was given to documentation that was deemed complete and accurate. Any portion of the documentation or any single document that failed to meet the aforementioned criteria resulted in a score of unsatisfactory. A score of unsatisfactory does not mean that the underlying activity was improperly performed or necessarily indicate that the documentation is out of compliance but that the documentation is not complete and/or accurate for the purposes of this assessment.

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

Metric		2018
Internal Shop Audits	Number of shops audited	7
	Total number of records reviewed	2,380
	Percentage of documentation deemed complete and accurate	94.1%
Construction Oversight Program*	Number of construction packets audited	54
	Number of processes reviewed	22
	Percentage of documentation deemed complete and accurate	72.8%
Issue Management Assessments	Number of assessments completed	4
	Total number of records reviewed	957
	Field audits conducted	110
	Percentage of documentation deemed complete and accurate	94.1%

**Construction Oversight is a review of the records contained in the construction project folders*

UNDERGROUND STORAGE INTEGRITY PROGRAM

In 2018, DEO continued progressing with the Underground Storage Integrity Program. DEO developed an electronic inspection system to replace the paper forms that were used to record well-site inspection information. Inspections on over 800 wells were completed monthly. Along with the monthly well inspections, DEO conducted numerous other inspections including: casing inspection logs, inspections on plugged and/or abandoned wells and wellhead valve inspections. A new wellhead valve inspection and testing procedure was developed for the wellhead valves, which comprise master gates, side gates and flow gates. Over 800 wells were inspected and tested. Also, additional well data research was conducted to obtain casing and cement information from the well files. A review of risk input variables was conducted and the 2018 risk ranking was completed.

In 2018, DEO filed its 2017 Annual DOT report to PHMSA. Also in 2018, PHMSA personnel conducted an inspection of DEO's Chippewa and Gabor/Wertz storage fields with participation from ODNR and PUCO staff.

Metrics: As part of Dominion Energy Ohio's commitment towards continuous improvement, the 2018 risk model was refined. The data used in the 2017 risk ranking was re-generated using the refined model, resulting in a change in the baseline metrics. The results of the refined model are reflected for both 2017 and 2018 in the table below.

Metric	2017	2018
Percentage of Baseline Casing Inspection Logs Completed	53%	62%
Casing Inspection Logs Completed		76
Wellhead Valve Inspections Completed		2,497
Wellhead Valves Replaced		45
Plugged & Abandoned Well Inspections Completed		229

DEO Risk Ranking

Performance Measure	2017	2018
Normalized Risk from Design Score	2.41	2.10
Normalized Risk from Integrity Score	6.75	5.88
Normalized Risk from O&M Score	0.56	0.28
Normalized Risk from Well Intervention Score	0.00	0.01
Normalized Risk from Well: Third Party Score	0.00	0.00
Normalized Risk from Surface: Third Party Score	1.02	0.79
Normalized Risk from Weather and Outside Forces Score	0.28	0.27
Normalized Risk from Reservoir: Third Party Score	0.14	0.12
Normalized Risk from Geologic Uncertainty Score	0.13	0.10
Normalized Risk from Reservoir Fluids Score	0.10	0.10

GATHERING RIGHTS OF WAY MAINTENANCE

In 2018, DEO continued to utilize two vendors to finish off the pilot program that was launched in 2017. Upon extensive analysis of the pilot data several areas were identified for process improvements. As a result, the work to be completed in 2019 was bid out as a bundled project, which includes line locating, mowing, clearing, timbering, line marker installation and maintenance, and cleanup (residential stump grinding and seeding). DEO also enhanced the process for easement research and customer notification. Previously, easement research was initiated relying on GIS data, before the pipeline was physically located. DEO determined, however, that physically locating the pipeline before research was commenced ensured that ROW and parcel information is accurate and correct, avoiding unnecessary research.

DEO also developed a vegetation management plan, which will be put into action in 2019 for the areas previously cleared. The geographic areas that were cleared in the pilot are being assessed for vegetation management through herbicide application. The well planned execution of the vegetation management phase of the program will at minimum greatly reduce the frequency in which the right-of-ways need mowed. The application will encourage growth of low native grasses and prevent the growth of the woody species resulting in an easily assessable right-of-way.

Metrics:

Metric	2017	2018
Percentage of Gathering lines cleared and/or assessed	2.3%	16.8%
Miles of Gathering lines cleared and/or assessed	13.5	84.5
Miles of Gathering lines located	21	77
Number of new line markers or replacement stickers installed	420	155
Number of encroachments identified and reported		29
Number of exposures identified and reported		7

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Summary: Report 2019 PSMP Annual Report electronically filed by Mr. Christopher T Kennedy on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio