

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Columbia Gas of Ohio, Inc., for a	)	
Limited Waiver of Ohio	)	Case No. 20-1356-GA-WVR
Administrative Code 4901:1-16-	)	
04(H).	)	

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**APPLICATION OF  
COLUMBIA GAS OF OHIO, INC.**

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Pursuant to Ohio Adm.Code 4901:1-16-02(E), Columbia Gas of Ohio, Inc. (“Columbia”) files Application for a limited waiver of Ohio Adm.Code 4901:1-16-04(H). Per Ohio Adm.Code 4901:1-16-02(E), Columbia is requesting a limited waiver of the rule, which is not mandated by statute, for good cause shown below. In support of its Application, Columbia states as follows:

1. Columbia is an Ohio corporation engaged in supplying natural gas to approximately 1.4 million customers in 61 counties. Columbia is a public utility and natural gas company pursuant to R.C. 4905.02(A) and 4905.03(E), and is subject to the Commission’s jurisdiction.

2. Columbia requests a limited waiver of the time requirement to classify non-hazardous leaks pursuant to Ohio Adm.Code 4901:1-16-04(H). Ohio Adm.Code 4901:1-16-04(H) requires an operator to “classify all other [non-hazardous] leaks within two business days of discovery.” Columbia requests a limited waiver of this portion of the rule solely to allow Columbia to pilot new leak detection equipment until July 31, 2022. For all of Columbia’s remaining work, Columbia will continue to meet all requirements contained in Ohio Adm.Code 4901:1-16-04(H).

3. Columbia has engaged Picarro, Inc. (“Picarro”) to pilot Picarro’s mobile leak detection equipment on a preliminary basis. Columbia anticipates piloting the Picarro equipment to conduct supplemental leak surveys of Columbia’s Accelerated Mains Replacement Program (“AMRP”) projects, newly installed mains, and quality assurance of previously surveyed traditional leakage

compliance surveys. While Columbia is piloting this equipment, Columbia will continue to maintain its compliance with 49 CFR 192.723 by conducting leakage surveys with traditional leak survey equipment once every three calendar years not to exceed 39 months, and in business districts once each calendar year not exceeding 15 months.

4. To use the Picarro mobile leak detection equipment, Picarro must drive the designated survey area at least three separate drives (six passes), which is typically done over a minimum of two separate nights, weather dependent, to ensure the best probability of leak detection. After the third and final drive, Columbia will run an analytics report the following business day. During the analytics, each methane plume indication is risk ranked with Picarro's proprietary algorithm based on amplitude, concentration, ethane to methane ratio, disposition, and disposition confidence percentage. Picarro's analytics will likewise assign a risk score for each indication and group them into risk ranking groups, numbered 1-4. Risk ranking Group 1 is defined as the top 10 percentile of highest-risk leaks. Groups 2, 3, and 4 are the top 25, top 50, and bottom 50 percentile, respectively.

5. Columbia will investigate all methane plumes with an amplitude of 5.0 or greater within the same business day. Columbia will then investigate all methane plumes in risk ranking Group 1 within two business days. After all risk ranking Group 1 plumes are investigated, Columbia will continue to investigate Groups 2, 3, and 4 within five business days, pending inclement weather, not to exceed ten calendar days. After grading the leaks in each Group in these timeframes, Columbia will remediate all graded leaks in the timeframes required by Ohio Adm.Code 4901:1-16-04(I), including dispatching its crews immediately for any hazardous (*e.g.*, Grade 1) leaks.

6. With each methane plume investigation described in the previous paragraph, Columbia will follow the other requirements of Ohio Adm.Code 4901:1-16-04(H), including that Columbia shall: (1) classify all leaks utilizing leak detection equipment; and (2) classify leaks utilizing the grade-one, grade-two, and grade-three classifications listed in Ohio Adm.Code 4901:1-16-04(H)(1) – (H)(3).

7. Columbia anticipates that the pilot of Picarro's mobile leak detection equipment will last until July 31, 2022. At that time, Columbia will analyze whether it intends to expand the use of the Picarro mobile leak detection equipment or continue to solely use the traditional methods of leak detection.

**WHEREFORE**, for the reasons set forth above, Columbia respectfully requests that the Commission approve a limited rule waiver requested herein, and grant it all other necessary and proper relief.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ Joseph M. Clark

Joseph M. Clark, Asst. Gen. Counsel  
(0080711)

P.O. Box 117

290 W. Nationwide Blvd.

Columbus, Ohio 43216-0117

Telephone: (614) 460-6988

E-mail: josephclark@nisource.com

(Willing to accept service by e-mail)

Attorney for

**COLUMBIA GAS OF OHIO, INC.**

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**8/7/2020 3:48:43 PM**

**in**

**Case No(s). 20-1356-GA-WVR**

Summary: Application of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.