

November 19, 2020

Ms. Tanowa Troupe
Secretary, Office of Administration
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: Case Number 89-8003-GA-TRF
Case Number 20-1556-GA-ATA

Ms. Troupe:

In compliance with the Public Utilities Commission of Ohio's ("Commission") Finding and Order dated November 18, 2020 in the above-referenced proceeding, and in compliance with the Commission's rules governing Tariff Filing Procedures in Case No. 89-500-AU-TRF, Columbia Gas of Ohio, Inc. has enclosed for filing a copy of the following tariff sheets:

Section No.	Sheet No.	Description
	Three Hundred and Seventeenth Revised Sheet No. 1a	Index
	Two Hundred and Forty-Ninth Revised Sheet No. 1b	Index
Section VI	Second Revised Sheet No. 37	Part 6 – Quality of Gas Delivered to Company
Section VI	Original Sheet No. 37a	Part 6 – Quality of Gas Delivered to Company
Section VI	Fourth Revised Sheet No. 38	Part 6 – Quality of Gas Delivered to Company
Section VI	Original Sheet No. 38a	Part 6 – Quality of Gas Delivered to Company
Section VI	Original Sheet No. 38b	Part 7 – Authorized Daily Volume

Very truly yours,

Melissa L. Thompson
Director of Regulatory Policy

Enclosures

COLUMBIA GAS OF OHIO, INC.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION

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Filed in accordance with Public Utilities Commission of Ohio Finding and Order dated November 18, 2020 in Case No. 20-1556-GA-ATA.

Issued: November 19, 2020

Effective: November 19, 2020

Issued By
Vincent A. Parisi, President

P.U.C.O. No. 2

Two Hundred and Forty-Ninth Revised Sheet No. 1b

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Two Hundred and Forty-Eighth Revised Sheet No. 1b

**COLUMBIA GAS OF OHIO, INC.
RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

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on behalf of Customer to Company at point(s) of receipt with an interstate pipeline shall conform to the interstate pipeline's gas quality standards.

- B. **Quality of Gas at Other Point(s) of Receipt.** Gas delivered by or on behalf of Customer to Company at point(s) of receipt other than an interstate pipeline shall be commercially free from oil, water, air, salt, dust, gum, gum-forming constituents, harmful or noxious vapors, or other solid or liquid matter which might interfere with its merchantability or cause to or interference with proper operation of the lines, regulators, meters, and other equipment of Company or its customers.

Customer will indemnify and hold Company harmless from any suits, actions, debts, accounts, damages, costs, losses and expenses, including but not limited to, attorneys' fees and expenses, arising from personal injury, death, or damage to Company's equipment or facilities or arising from personal injuries, death, or damage to the facilities, products, or equipment of Company's other customers or third parties, or arising from additional hours worked by Company or its other customers or third parties, caused as a result of Customer's gas failing to meet the quality specifications set forth herein.

However, pursuant to the Commission's opinion and order in Case No. 85-1406-AU-COI, approval of the above tariff language by the Commission does not constitute a determination by the Commission that the limitation of liability imposed by the Company should be upheld in a court of law. Approval by the Commission merely recognizes that since it is a court's responsibility to adjudicate negligence and consequent damage claims, it is also the court's responsibility to determine the validity of the exculpatory clause.

To assure that the gas delivered by Customer to Company conforms to the quality specifications of this Section, Customer's gas shall be analyzed at the point(s) of receipt from time-to-time as Company deems necessary. The gas delivered shall conform to the following gas quality specifications:

Gas Quality Specifications¹

Gas Quality Parameter Specification	Low	High
Heat Content (Btu/scf) ²	967	1110
Wobbe Number (+/- 4% from historical average gas, which is 1341 – 1383)	1287	1400
Water Vapor Content (lbs./MM scf)		< 7
Product Gas Mercaptans (ppmv, does not include gas odorants)		< 1
Hydrocarbon Dew Point, (°F) CHDP		15
Hydrogen Sulfide (grain/100 scf)		0.25
Total Sulfur (grain/100 scf)		20
Total Diluent Gases including the following individual constituent limits: Carbon Dioxide (CO ₂) 2% max Nitrogen (N) 4% max Oxygen (O ₂) 1% max		5%
Hydrogen		0.3%
Total Bacteria ³ (If no filter installed, then limit is 6.4x10 ⁷ per 100 scf total bacteria)	Comm Free (≤ 0.2 microns)	
Mercury	Comm Free (< 0.06 µg/m ³)	
Other Volatile Metals (Lead)	Comm Free (< 213 µg/m ³)	
Siloxanes as Octamethylcyclotetrasiloxane ⁴	Comm Free (< 0.5 mg Si/m ³)	
Ammonia	Comm Free (< 10 ppmv)	

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COLUMBIA GAS OF OHIO, INC.

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Gas Quality Specifications¹

Gas Quality Parameter Specification	Low	High
Non-Halogenated Semi-Volatile and Volatile Compounds	Comm Free (< 500 ppmv)	
Halocarbons (total measured halocarbons) ⁵	< 3 ppmv	
Aldehyde/Ketones	Aldehydes/Ketones must be at a level that does not unreasonably interfere with odorization of Company's gas.	
PCBs/Pesticides	Comm Free (< 1 ppbv)	

- For purposes of this Tariff, "Commercially Free" is defined as "Not Detectable" relative to typical pipeline gas flowing at the interconnect location that results in RNG being compositionally equivalent to flowing supplies. The analytical method, associated detection threshold, and testing facility shall be determined by the Company. Periodic testing will be required where potential Constituents of Concern are reasonably expected.
- Higher Heating Value is dry, @ 14.73 psia 60°F.
- An acceptable alternative to Total Bacteria testing would be to include installation of a 0.2 micron particulate filter, coupled with appropriate filter maintenance practices. Initial start-up testing may include filter effectiveness analysis. Customer shall be responsible for all costs associated with acceptable alternatives, including, but not limited to, initial start-up testing.
- Historical testing and data presented in this document include a siloxane detection threshold of <0.5mg Si/m³. Analytical methods have recently been improved resulting in a reduced detection threshold of <0.1mg Si/m³. Due to specific limitations of certain identified applications within an affected zone of influence, Company and Customer may agree upon a reduced threshold.
- Company may refuse to accept gas containing lower levels of halocarbons if Company reasonably determines that such gas is causing harm to its facilities or the gas-burning equipment of its customers, or is adversely affecting the operation of such facilities. In addition, Company and Customer may agree upon a different specification for halocarbons, provided that (1) Customer has delivered RNG to Company for a period of at least five years prior to the effective date of this tariff section, and (2) Customer has demonstrated, to the reasonable satisfaction of Company, that the RNG meeting the agreed-upon specification will not adversely affect (a) the quality of public utility service provided by Company; (b) the operation or Company's equipment; or (c) the operation of the gas-burning equipment of Company's customers.

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As used in the foregoing table, "Btu" means British thermal unit; "scf" means standard cubic foot; "MM" means one million; "CHDP" means cricondenthem hydrocarbon dew point; "ppmv" means parts per million by volume; and "ppbv" means parts per billion by volume. As used in Section 6.2 and 6.3, "RNG" or "Renewable Natural Gas" means gas, consistently primarily of methane, which (1) is derived from biogas produced by landfills, animal farms, wastewater treatment plans, or other sources, and (2) is subsequently processed by removing carbon dioxide, nitrogen, and other constituents in order to convert the biogas into pipeline-compatible gaseous fuel.

The Total Heating Value of the gas shall be determined by taking samples of the gas at the point(s) of receipt at such reasonable times as may be designated by Company. The Btu content per cubic foot shall be determined by an accepted type of calorimeter or other suitable instrument for a cubic foot of gas at a temperature of sixty (60) degrees Fahrenheit when saturated with water vapor and at a pressure of 14.73 psia. The Btu determination designated by Company shall be made by Company at its expense. Any additional Btu determinations requested by Customer shall be at Customer's expense.

Company may, on a not-unduly discriminatory basis, accept volumes of gas, including renewable natural gas, that fail to meet the quality specifications set forth in this tariff section, if Company determines that it can do so without adversely affecting (1) system operations; (2) the operation of the Company's equipment; (3) the operation of gas-burning equipment of Company's other customers; or (4) the quality of public utility service provided by Company. In deciding whether to accept such volumes of gas, the Company shall consider, without limitation, (1) which specifications are not being met; (2) the sensitivity of customer equipment and potential impact on such equipment; (3) Customer's plan to improve gas quality; (4) the effect on system supply; (5) interchangeability; (6) the anticipated duration of the quality deviation; and (7) the blending ratio between geological natural gas and RNG in the area of Company's distribution system where RNG is being injected.

Company shall not be obligated to accept gas which it reasonably believes may adversely affect the standard of public utility service offered by Company, or gas which it reasonably believes may adversely affect the operation of its equipment or the gas-burning equipment of its customers. If any gas delivered hereunder fails to meet the quality specifications set forth herein, Company may, at any time, elect to refuse to accept all or any portions of such gas until Customer brings the gas into conformity with such specifications.

6.3. GAS QUALITY TESTING

Gas delivered to Company must be continuously monitored, at Customer's expense, to ensure it meets the quality specifications set forth in Section 6.2. Constituents that are not continuously monitored using currently-available technology must be tested in a laboratory once per year at Company's expense. If the quality of the gas, based on a laboratory test, does not meet the standards in Section 6.2, the gas must be tested in a laboratory monthly, at the Customer's expense, until the gas meets the standards in Section 6.2 for three consecutive months or the Customer otherwise demonstrates to the Company, in the Company's reasonable discretion, that it has remediated the constituent deficiency. Such tests shall include only the test method or methods that tests for the specific standard or standards that were not met, but Company may consider any results provided by such test method(s). Company will provide Customer with at least three (3) business days' notice of the tests described in this Section 6.3, and Customer will be given the opportunity to be present and observe such tests. Company may, at its option, require Customer to install automatic shutoff devices, at Customer's expense, to prevent gas that fails to meet the quality specifications set forth in Section 6.2 from entering Company's pipeline system.

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The scope of all gas testing shall follow the parameters below based on the origin of the gas. The parameters for each origin of gas are based on the source of gas and likelihood of a constituent being present in the source gas. The Company has the discretion to test for additional constituents on the list below, notwithstanding the origin of the gas, if the Company reasonably believes those constituents may be present.

Gas Quality Testing Parameters and Scope¹

Gas Quality Parameter	Testing Method ²	Origin of Gas			
		Geological	Landfill	Agricultural and Clean Energy	Waste Water Treatment Plant
Heat Content	In-field	X	X	X	X
Wobbe Number	In-field	X	X	X	X
Water Vapor Content	In-field	X	X	X	X
Product Gas Mercaptans	In-field	X	X	X	X
Hydrocarbon Dew Point	In-field	X	X	X	X
Hydrogen Sulfide	In-field or Lab	X	X	X	X
Total Sulfur	In-field or Lab	X	X	X	X
Total Diluent Gases including: Carbon Dioxide (CO ₂) Nitrogen (N) Oxygen (O ₂)	In-field	X	X	X	X
Hydrogen	Lab	X	X	X	X
Total Bacteria	Lab	X	X	X	X
Mercury	Lab		X		X
Other Volatile Metals (Lead)	Lab		X		
Siloxanes	Lab		X		X
Ammonia	Lab		X		X
Non-Halogenated Semi-volatile and Volatile Compounds	Lab		X		X
Halocarbons (total measured halocarbons)	Lab		X		X
Aldehyde/Ketones	Lab		X		
PCBs/Pesticides	Lab		X		

¹ Constituents to be tested for each category of gas are indicated with an "X."

² Testing method is defined as "In-Field" or "Lab." "In-Field" testing requires the Customer's use of readily available, continuously testing, industry-standard equipment, which has been reviewed and approved by Company. "Lab" testing requires the Customer and the Company to coordinate the sampling of gas and sending it to a laboratory for testing and analysis.

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7. AUTHORIZED DAILY VOLUME

Customer's Authorized Daily Volume on any day consists of the sum of Customer's transported volumes (as determined herein) plus any Backup Service for which Customer has contracted, plus any additional volumes that Company, in its sole discretion, authorizes Customer to use on that day. Delivery of Customer's Authorized Daily Volume is firm, with no planned interruptions, except as provided in Part 8 hereof. Consumption at Customer's facility in excess of the Authorized Daily Volume is interruptible service, and upon notice to Customer, Company may require Customer to reduce consumption to Customer's Authorized Daily Volume whenever Company, in its discretion, deems necessary to do so. Company may, at its option, require such reductions in consumption by Large General Transportation Service Customers prior to imposing similar reductions on Small General and General Transportation Service Customers. The Authorized Daily Volume for an Aggregation Pool shall equal the sum of the Authorized Daily Volumes (including Backup Service) for each Customer in the Aggregation Pool.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/19/2020 12:08:25 PM

in

Case No(s). 89-8003-GA-TRF, 20-1556-GA-ATA

Summary: Tariff Revised Tariff Pages, P.U.C.O. No. 2, for Gas Quality Specifications effective November 19, 2020 electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.