

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Ohio Power Siting	)	
Board's Review of Ohio Adm.Code	)	Case No. 21-902-GE-BRO
Chapters 4906-1, 4906-2, 4906-3, 4906-4,	)	
4906-6, and 4906-7.	)	

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**SUPPLEMENTAL INITIAL COMMENTS OF  
COLUMBIA GAS OF OHIO, INC.**

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On June 16, 2022, the Ohio Power Siting Board (the "Board") issued an Entry in this proceeding ("Entry") attaching Board Staff's proposed revisions to the Board's Rules for Ohio Adm.Code Chapters 4906-1, 4906-2, 4906-3, 4906-4, 4906-5, 4906-6, and 4906-7 ("Rules"). Columbia Gas of Ohio, Inc. ("Columbia") filed initial and reply comments in this docket on August 5, 2022 and September 2, 2022, respectively. On January 19, 2023, the Board issued an Entry requesting comments on further modifications proposed by Staff ("Supplemental Modifications").

Columbia submits the below Supplemental Initial Comments to offer support for Staff's proposed changes to Ohio Adm.Code Sections 4906-1-01(NN) and 4906-3-05. Further, Columbia respectfully requests that the arguments raised in Columbia's initial and reply comments continue to be considered by the Board in its review of potential changes to the Rules.

**I. Ohio Adm.Code 4906-1-01(NN) – Definition for "Route"**

Staff's Supplemental Modifications included a new definition for the term "Route," that recognizes the concept of a corridor, which was recommended by Columbia in its initial<sup>1</sup> and reply<sup>2</sup> comments. The adoption of this change eliminates a practical disincentive for Columbia and other applicants before the Board to work with landowners after the issuance of a certificate to make minor adjustments to the placement of a pipeline. Under the current version of the Board's rules, once a certificate is issued, adjustments to the approved route can require Board approval. As

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<sup>1</sup> Initial Comments of Columbia Gas of Ohio, Inc. at 2.

<sup>2</sup> Reply Comments of Columbia Gas of Ohio, Inc. at 4.

a result, certificate holders have a disincentive to make landowner-requested adjustments to the route. If it is a corridor that is approved, and not an exact route, certificate holders have the flexibility to make minor alterations to the route so long as those changes occur within the approved corridor. These alterations can accommodate landowner requests, respond to late-discovered practical issues with the exact route approved by the Board, and any other change beyond engineering adjustments. This flexibility affords certificate holders to be responsive to citizens whose property is impacted by proposed pipelines.

## **II. Ohio Adm.Code 4906-3-05 – Site or Route Information**

Staff's Supplemental Modifications also included a clarification that a standard application should include an alternative route, but that an applicant need not provide "fully developed information" on this alternative. This needed change to the Rules significantly reduces the cost to prepare standard applications, which in the case of utility applicants like Columbia, is ultimately paid for by ratepayers. This proposed revision adopts the spirit of arguments raised in Columbia's initial<sup>3</sup> and reply<sup>4</sup> comments. In addition to cost savings for utility customers, Staff's proposed Supplemental Modifications will also minimize the intrusiveness of the Board's requirements on landowners along alternate routes. In order to prepare fully developed information for an alternate route, Columbia and other applicants must conduct field surveying, which requires Columbia personnel and contractors to enter landowners' property and can sometimes create inconveniences for those landowners. More often than not, the Board selects preferred routes over alternates, which makes these intrusions unnecessary, and the preparation of fully developed information related to alternate routes needlessly costly to customers. For these reasons, Columbia supports this proposed change.

## **III. CONCLUSION**

Columbia appreciates the Board and its Staff for its thoughtful consideration of the foregoing comments. Further, Columbia reiterates its request that the Board consider its previous initial and reply comments filed in this docket.

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<sup>3</sup> Initial Comments of Columbia Gas of Ohio, Inc. at 8-9.

<sup>4</sup> Reply Comments of Columbia Gas of Ohio, Inc. at 6-7.

**COLUMBIA GAS OF OHIO, INC.**

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## CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 30th day of January, 2023, upon the parties listed below:

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