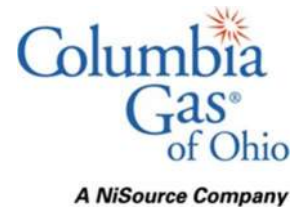


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June 23, 2026

Ms. Tanowa Troupe
Secretary, Office of Administration
Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

Re: *In the Matter of the Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the Woodward Park NCHP Pipeline Project.*

OPSB Case No. 25-0838-GA-BTX

Dear Ms. Troupe:

Columbia Gas of Ohio, Inc. ("Columbia") submits this Application for a Certificate of Environmental Compatibility and Public Need for the Woodward Park North Columbus High Pressure ("NCHP") Pipeline Project (the "Project"). The Project involves replacing an existing natural gas transmission line in the Woodward Park area by installing approximately 5.3 miles of 20-inch diameter and approximately 1.4 miles of 12-inch diameter steel natural gas pipeline to support the central Ohio system.

In accordance with Adm.Code 4906-2-04(A)(3), Columbia makes the following declarations:

(a) Name and address of the applicant.

Columbia Gas of Ohio, Inc.
290 W. Nationwide Blvd.
Columbus, Ohio 43215

(b) Name and location of the proposed facility.

Woodward Park NCHP Pipeline
Franklin County, Ohio

(c) Name and address of the applicant's authorized representative.

Michael J. Schuler
Melissa L. Thompson
Ashley G. LaRock
290 W. Nationwide Blvd.
Columbus, Ohio 43216-0117
mschuler@nisource.com
mlthompson@nisource.com
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(d) An explanation of any information that was presented by the applicant in the preapplication notification letter that has been revised by the applicant since the issuance of the letter.

Columbia updated the approximate acreage impacted from 40 acres which was included in its preapplication notification letter to approximately 77 acres to reflect the limits of disturbance included in its application.

(e) Notarized statement that the information contained in the certificate application is complete and correct to the best knowledge, information and belief of the applicant.

See the attached affidavit of Robert E. Heidorn.

Sincerely,

/s/ Michael J. Schuler
Michael J. Schuler (Counsel of Record)

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Attorneys for

COLUMBIA GAS OF OHIO, INC.

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for a)
Certificate of Environmental) Case No. 25-0838-GA-BTX
Compatibility and Public Need for the)
Woodward Park NCHP Pipeline)
Project.)

AFFIDAVIT OF ROBERT E. HEIDORN

STATE OF OHIO)
COUNTY OF FRANKLIN) SS:

Now comes Robert E. Heidorn, President and COO, Columbia Gas of Ohio, Inc.,
having been first duly sworn, declares and states as follows:

- 1. I have reviewed Columbia Gas of Ohio, Inc.'s Application for a Certificate of
Environmental Compatibility and Public Need to construct a natural gas pipeline
in Case No. 25-0838-GA-BTX ("Application").
2. To the best of my knowledge, information, and belief, the information and
statements contained in the Application are true and correct.
3. To the best of my knowledge, information, and belief, the Application is
complete.

Handwritten signature of Robert E. Heidorn

Robert E. Heidorn
President and COO
Columbia Gas of Ohio, Inc.

Sworn to before me and signed in my presence this 3rd day of June, 2026.

Handwritten signature of Melissa L. Thompson
Notary Public

My Commission Expires N/A



Melissa L. Thompson, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Sec. 147.03 R.C.

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for a)
Certificate of Environmental) Case No. 25-0838-GA-BTX
Compatibility and Public Need for the)
Woodward Park NCHP Pipeline Project.)
)

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

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4906-4-02

PROJECT SUMMARY AND APPLICANT INFORMATION

4906-4-02 - Project Summary and Applicant Information

The applicant shall provide a summary of the proposed project consistent with that presented at public informational meetings. The summary should be suitable as a reference for state and local governments and for the public. Examples of relevant information for inclusion in the project summary are:

(A) A statement explaining the purpose of the facility.

Columbia Gas of Ohio, Inc. (“Columbia”) proposes to construct a natural gas pipeline identified as the Woodward Park North Columbus High Pressure (“NCHP”) Pipeline Project (the “Project”) in Columbus, Ohio. The proposed Project route will be approximately 35,495 feet (6.7 miles) in length.

The Project consists of:

- Construction of approximately 27,980 feet (5.3 miles) of 20-inch diameter high pressure gas pipeline.
- Construction of approximately 7,515 feet (1.4 miles) of 12-inch diameter high pressure gas pipeline.

The purpose of the Project is to further Columbia's efforts to meet mandates of the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) rule changes in 49 C.F.R. 191 and 192, commonly referred to as the “PHMSA Mega Rule.”

As described in the Direct Testimony of Brent Shuler in Case No. 25-1129-GA-ALT, *et al.*, the PHMSA Mega Rule is a set of regulations published by PHMSA that became effective in July of 2020. The Mega Rule enhances safety regulations for onshore gas transmission pipelines and establishes required actions by pipeline operators. Part 1 of the PHMSA Mega Rule sets requirements for maximum allowable operating pressure (“MAOP”) reconfirmation and verification of pipeline materials. The Mega Rule provides guidance to operators regarding records requirements for all transmission pipelines newly installed after July 1, 2020. It also describes requirements for reconfirming the MAOP of pipelines and facilities installed before July 1, 2020, that are in certain class locations or high consequence areas (“HCAs”) and lack certain traceable, verifiable, and complete (“TVC”) records such as material attributes and sufficient pressure test records. Operators have until 2035 to comply with these measures, but at least 50% of the work in scope must be completed by 2028.

Transmission pipelines installed prior to July 1, 2020, must have a pressure test that meets the requirements in each of the TVC definitions described below.

- Traceable records are those which can be clearly linked to original information about a pipeline segment or facility. Traceable records might include pipe mill records, which include mechanical and chemical properties; purchase requisition; or as-built documentation indicating minimum pipe yield strength, seam type, wall thickness and diameter.
- Verifiable records are those in which information is confirmed by other complementary, but separate, documentation. Verifiable records might include contract specifications for a pressure test of a pipeline segment complemented by pressure charts or field logs.
- Complete records are those in which the record is finalized as evidenced by a signature, date, or other appropriate marking, such as a corporate stamp or seal. For example, a complete pressure testing record should identify a specific segment of pipe, who conducted the test, the duration of the test, the test medium, temperatures, accurate pressure readings, and elevation information as applicable.

Columbia uses these definitions as it reviews all applicable records for pipelines to determine whether MAOP reconfirmation will be necessary, due to a record(s) that does not meet the TVC guidelines.

All the 20-inch pipe that is being retired and replaced through the Project is in a Class 3 location and is a High Consequence Area. The 12-inch pipe that is being installed through the Project is being installed in a Class 3 location. Columbia has elected to replace pipeline as a part of this Project to comply with the PHMSA Mega Rule.

Much of the 20-inch and 12-inch natural gas pipeline will be constructed via open trench construction methods within the public rights-of-way (“ROW”) within the City of Columbus as well as permanent private pipeline easements. Exceptions include the crossing of other utility easements such as interstate roads and railroads, and environmental features such as streams and rivers. A combination of horizontal directional drills (“HDD”) and open cut installation methods will be utilized on the public ROW and public ROW crossings, within the permanent private pipeline easements, utility easements, and on environmental crossings. If any new information is discovered, or for commercially reasonable reasons, Columbia may utilize the jack

and auger boring, HDD, and open cut installation methods interchangeably during construction of the Project.

This Project meets the requirements of the Standard Application as it is a pipeline replacement greater than five miles in length. See Appendix B of Adm.Code 4906-1-01.

(B) A description of the location, size, acreage, and operating characteristics of the proposed facility.

The MAOP of the 20-inch and the 12-inch pipeline will be 190 psig. The Project is designed to a design pressure of 720 psig on the 20-inch and 12-inch steel replacement. When installed and tied in, the newly installed segments will have an MAOP of 190 psig, consistent with the entire NCHP system. While there are no current capacity or pressure concerns on the system, Columbus has been a significant area of growth in Ohio, and the state continues to advocate for energy-dependent economic development projects in the central Ohio region. Testing the newly installed facilities to enable a 720 psig design pressure allows for useful additional reserve capacity to empower future flexibility without the need to replace and/or interrupt and retest the NCHP system in the future. Columbia will install 5.3 miles of new 20-inch steel high pressure gas pipeline and 1.4 miles of new 12-inch steel high pressure gas pipeline. The overall Project limit of disturbance (“LOD”) area is approximately 77 acres.

The Project will generally run through the City of Columbus, and Perry and Sharon Townships in Franklin County, Ohio. More specifically, the proposed Project route starts at the Postlewaite Station off Postlewaite Road and heads south to Bethel Road. The pipeline will have multiple HDDs to minimize impacts; one of the HDDs will be to cross the Olentangy River. The proposed Project route then runs under West Rathbone Avenue and Morse Road. The pipeline will continue down Morse Road and then head north along Karl Road to terminate at an existing station.

A detailed description of the proposed routing of the Project, including the rationale for the proposed Project route and a discussion of alternatives, is included in response to Adm.Code 4906-4-04 of this Application as well as Figure 7.

(C) A discussion of the suitability of the site or route for the proposed facility.

Columbia provides a detailed description of its evaluation of the suitability of the proposed and alternate routes in response to Adm.Code 4906-4-04. Based on known information from public sources and preliminary field evaluations, Columbia selected the proposed and alternate routes as they are both constructible and meet the application rule requirements for this Project. The proposed Project route obviates constraints and issues associated with the alternative routes as further described in response to Adm.Code 4906-4-04.

(D) A description of the applicant's history, affiliate relationships, and current operations, and a description of the entity that will construct and operate the facility, if different from the applicant.

Columbia is a regulated public utility primarily engaged in the distribution and transportation of natural gas. Columbia serves approximately 1.5 million residential, commercial, and industrial customers across Ohio. Columbia will construct the Project using a construction contractor and operate the Woodward Park NCHP after its completion.

Columbia is a subsidiary of NiSource Inc. ("NiSource"), which is one of the largest natural gas utility companies in the United States. NiSource is headquartered in Merrillville, Indiana and maintains a significant corporate presence in Columbus, Ohio. NiSource utilities serve approximately 3.5 million natural gas and 500,000 electric customers across six states. A list of affiliated companies can be found in NiSource's annually filed Form 10-K, accessible here: <https://investors.nisource.com/financial-filings-and-reports/sec-filings/default.aspx>.

(E) For a proposed electric generation facility, a description of any plans for future additions of electric power generation units for the site and region (including the type and timing) and the capacity anticipated for the site.

Adm.Code 4906-4-02(E) does not apply to this Project.

4906-4-03

**PROJECT DESCRIPTION IN DETAIL AND PROJECT
SCHEDULE IN DETAIL**

(2) Describe the proposed construction sequence.

The proposed construction sequence will begin with survey and staking, followed by some minor clearing activities and front-end grading and right-of-way topsoil stripping, as applicable. The trench centerline will then be re-staked, and trenching will be performed using a wheel ditcher, with provisions for rock trenching if necessary. The trench bottom will be padded, and the pipe will be strung, field bent, lined up and welded. After as-built footage is taken, welds will be x-ray inspected, repaired as needed and coated. The coating will be inspected and repaired before the pipe is lowered into the trench. An as-built survey will then be completed.

For areas utilizing HDD, the process begins with drilling a small-diameter pilot hole along a path. The hole is enlarged through reaming passes to the required diameter, and the prefabricated pipe string is pulled through the borehole. If there is an inadvertent release, Columbia will follow the NiSource Inadvertent Release Contingency Plan in Appendix A. While not anticipated, an alternative jack and auger bore method could be used requiring horizontal auger boring, entry and receiving pits are excavated. A boring machine jacks carrier pipe through the earth while a rotating internal auger removes the soil.

Road plating will be used for temporary vehicle traffic as needed. The trench will then be padded, backfilled, and rough graded. Backfill and pavement will meet the specifications from the City of Columbus and excerpts of those requirements are included in Appendix B. For the complete listing of the City of Columbus' *Construction and Material Specifications* can be found at the following website: [cm-sc-online-version-january-2026-final-document.pdf](https://www.columbus.gov/files/2026/01/cm-sc-online-version-january-2026-final-document.pdf). Roads will be repaired in accordance with Section 250 of the Construction and Material Specifications and Pavement & Utility Cut Repair Standards of the City of Columbus Standard Drawing 1441 and other permit conditions. Finally, the pipeline will be hydrostatically tested and tied-in, and the area will be restored with topsoil and final cleanup.

(3) Provide a description of the project area. Examples of relevant project area information include: geography, topography, population centers, major industries, and landmarks, including:

The Project is located in central Ohio, within the corporate boundaries of Columbus, Ohio and the county boundaries of Franklin County, Ohio. The proposed Project area has relatively limited topographic variation, as the area is

primarily urbanized, following major roads. The proposed Project borders the Kenney Park Nature Preserve on its southern boundary. The proposed Project lies within the Loamy, High Lime Till Plains Level IV Ecoregion.¹ This ecoregion is characterized by a history of glaciation which led to till plains with low gradient streams, loamy soil, and scattered loess and shale deposits.

Columbus, Ohio is a large city that had a population of approximately 933,263 in 2024.² The major industries in Columbus, Ohio are shown in Table 2 below.

Table 2: Major Industries in Columbus, Ohio

Industry	Percent of Working Population
Educational services, and health care and social assistance	25.4
Professional, scientific, and management, and administrative and waste management services	13.4
Retail trade	11.5
Arts, entertainment, and recreation, and accommodation and food services	9.4
Finance and insurance, and real estate and rental and leasing	8.0
Transportation and warehousing, and utilities	7.6
Manufacturing	6.4
Construction	5.6
Miscellaneous	12.6

Source: U.S. Census Bureau 2024

- (a) A map of not less than at least 1:24,000 scale, submitted in a shapefile or geodatabase, including the area one thousand feet on each side of the proposed facilities for electric power transmission lines and gas pipelines, or a two-mile radius from the project area for a generation facility. Examples of information that should be included in the map include:**

Figure 1 includes the list of items in i – viii below.

¹ A. J. Woods et al. 2003. Ecoregions of Indiana and Ohio. Accessed online: https://dmap-prod-oms-edc.s3.us-east-1.amazonaws.com/ORD/Ecoregions/oh/ohin_front.pdf

² U.S. Census Bureau. 2026. Quick Facts: Columbus City, Ohio. Accessed online: <https://www.census.gov/quickfacts/fact/table/columbuscityohio/PST045224#qf-flag-NA>

i. The proposed facilities, route corridor, and potential right-of-way extents.

Please see Figure 1 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(3)(a) above.

ii. Roads and railroads.

The proposed Project route is within Postlewaite Road, Bethel Road, Olentangy River Road, West Rathbone Avenue, Morse Road, Indianola Avenue, and Karl Road. The proposed Project route has a crossing under CSX and Norfolk Southern railroads. Please see Figure 1 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(3)(a) above.

iii. Major institutions, parks, and recreational areas that are publicly identified and publicly owned.

The proposed Project route centerline is within 1,000 feet of the following: Anheuser Busch Sports Park, Olentangy Trail, Olentangy Parkland, Kenney Park, Kenney Park Nature Preserve, Beechwold Park, Woodward Park Middle School, Parkmoor Elementary School, and Indianola Park. Please see Figure 1 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(3)(a) above.

iv. Existing gas pipeline and electric power transmission line corridors.

There are existing Columbia transmission gas pipeline as well as a Marathon Petroleum transmission gas pipeline and AEP Ohio transmission lines. Please see Figure 1 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(3)(a) above.

v. Named lakes, reservoirs, streams, canals, and rivers.

The proposed Project route crosses the Olentangy River. Please see Figure 1 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(3)(a) above.

vi. Population centers and legal boundaries of cities, villages, townships, and counties.

These legal boundaries are shown in Figure 1 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(3)(a) above.

vii. Sensitive receptors within 500 feet of the route or site (such as occupied buildings).

There are approximately 1,358 sensitive receptors within 500 feet of the proposed Project route centerline. Please see Figure 1 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(3)(a) above which shows parcel boundaries and many of those areas are occupied buildings.

viii. The area, in acres, of the proposed site or right-of-way for the facility, the length of the electric power transmission line or gas pipeline, in miles, and the number of properties crossed by the facility.

The proposed Project is 6.7 miles long and crosses 6 private parcels owned by 6 different landowners. A list of these parcels is included in Appendix C. The total footprint of the proposed Project, including the pipeline LOD, laydown areas, additional temporary workspace, and temporary access roads is 77 acres.

(4) Describe the project's proposed installation methods. Examples of relevant information include:

(a) The proposed site clearing, construction methods, and reclamation operations, including:

(i) Surveying and soil testing.

A civil survey was completed on the proposed Project route during route development. It was done using conventional surveying methods. Man-made facilities along the centerline that may affect pipeline design were located during the survey. Offsets were used to survey around large obstructions. The centerline of the approved route will be staked prior to construction. A desktop geotechnical overview was performed on the

proposed Project route. The final geotechnical report will be provided when complete. Due to the requirements of the Project construction, regardless of the route selected, the collection of additional geotechnical information will occur during the construction process. The collection of this additional geotechnical information is necessary for proper construction but was not necessary to verify that the Project meets applicable legal and practical criteria for approval.

(ii) Grading and excavation.

Within the Project LOD identified in Appendix D and on Figure 2, there will be grading, as necessary, to provide a safe and efficient work area for construction equipment and personnel. The proposed Project route is relatively level, so grading requirements will be minimal. Temporary erosion and soil controls will be installed and functioning properly prior to ground disturbance activities as needed. Existing vegetation will be removed. Within the LOD, topsoil will first be segregated and stockpiled.

After grading, a trench will be excavated. The trench size will be approximately 4 feet wide by a variable depth, minimum of 4 feet of cover. In locations where there are multiple pipes installed in the same trench, the width will be closer to 8 feet wide. Trench excavation is typically accomplished using standard equipment such as backhoes, excavators, or trenching machines. Depending on substrate conditions, specialized equipment (e.g., jackhammers) may be required. The depth of the pipeline will be variable, with a minimum required cover of four feet. Excess backfill material will be distributed over the trench and spoil areas or hauled from the site. Warning tape will be installed over all open cut pipeline installation. Finally, the trenches will be backfilled primarily utilizing native spoils and will then have the segregated topsoil replaced restoring the land surface to its original contours. Backfill and compaction will be completed in accordance with City of Columbus Pavement & Utility Cut Repairs Standard Drawing 1441 and NiSource standards and tested in accordance with the City of Columbus Public Service Department Transportation Division's Supplemental Specification 1501. All non-native material used in backfilling and pavement repair will be in accordance with Section 300 or Section 600 Item 613 of the City of Columbus Construction and Material Specifications, updated January 1, 2026. Refer to Appendix B for excerpts from these specifications.

The planned method for crossings of the Olentangy River and the CSX and Norfolk Southern railroads is to use HDD. For HDD installation, a pilot hole will be drilled along the proposed pipeline centerline. Then, the pilot hole will be enlarged, which is known as the reaming process. Finally, the pipe will be pulled back through the reamed hole. During HDDs, drilling fluid is utilized to assist with the mechanical drilling process. The fluid needs to be constantly monitored during the drilling process for an inadvertent release of the drill fluids. The most obvious sign of a release is the visible pooling of drilling mud on the surface, a sudden decrease in mud volume returns at the entry site, or a loss in drilling mud pump pressure. Refer to NiSource's Inadvertent Release Contingency Plan (Appendix A) for the containment, clean-up, and OPSB notification plans should an inadvertent release occur.

Though not currently planned, jack and auger boring may also be used as an installation method to maintain traffic flow through roadway intersections and in areas where utility conflicts may not allow for open trenching. Under this construction method, the contractor would excavate a launching pit large enough to accommodate a bore rig, pipe joints, and any ground shoring for wall stability. A second receiving pit would be excavated at the planned end of the jack and auger boring to allow for removal of the auger tooling. The boring machine would be installed and aligned within the launching pit, and joints of abrasion resistant overcoated carrier pipe containing a continuous flight auger would be hydraulically jacked from the launching pit to the receiving pit, with a rotating cutting head at the start of the bore pipe and the auger allowing for spoils cutting and removal. As individual joints of carrier pipe are pushed into the bore hole, new carrier pipe joints with auger stems will be added as needed to reach the final length of the jack and auger boring. Once the carrier pipe reaches the receiving pit, the cutting head will be removed inside the receiving pit, and the auger stems will be pulled back into the receiving pit for removal.

(iii) Construction of temporary and permanent access roads and trenches.

No permanent or temporary access roads are currently planned for the Project.

Construction of trenches is discussed in Section 4906-4-03(A)(4)(a)(ii). Open trenches without protection where workers may be present will be limited to a minimum slope of 1H:1V. In instances where this sloping is not feasible, trench boxes or similar shoring equipment in compliance with relevant OSHA standards will be used to maintain trench stability and prevent collapse. Engineered shoring will be required in any cases where shoring depth meets or exceeds 20 feet in depth. Trenches will be backfilled promptly upon completion of work, with protective fencing or steel plating used to secure trenches that may be left unattended for work activities spanning multiple days. All backfilled trenches within road ROW will be compacted in accordance with City of Columbus Pavement & Utility Cut Repairs Standard Drawing 1441 and tested in accordance with City of Columbus Public Service Department Transportation Division's Supplemental Specification 1501 as applicable.

(iv) Stringing of cable and/or laying of pipe.

For this Project, Columbia will install the pipe using standard open-trench construction or specialized crossing methods, such as HDD. Individual sections of pipe will be strung along within the LOD and welded together. The welds will be visually and radiographically (x-rayed) inspected by qualified personnel. After inspection, the welds will be coated, and the pipeline will be lowered into the trench. Care will be taken during installation to minimize secondary stress and prevent damage to the pipe. Well-tamped earth fill or other continuous support will be used to prevent shearing, and the pipe will be insulated at any point of contact with a suitable insulating material like rock shield.

(v) Installation of electric transmission line poles and structures, including foundations.

Adm.Code 4906-4-03(A)(4)(v) does not apply to this Project.

(vi) Post-construction reclamation.

The construction work area, including any areas disturbed by specialized pipeline crossing methods, will be restored to pre-construction conditions. Since the pipeline is primarily within the public ROW, this includes any specific road conditions agreed to with the City of Columbus.

Restoration activities will include the permanent repair of fences and other surface features; the re-establishment of drainage ditches; fertilizing, seeding and mulching of disturbed areas; and the removal of temporary erosion and sediment controls once sufficient vegetative cover is established. Pipeline markers will be installed, as needed, to identify the pipeline's location. Pavement restoration will be completed in accordance with Section 250 of the Construction and Material Specifications and Standard Drawing 1441 of the Pavement & Utility Cut Repair Standards of the City of Columbus, refer to excerpts in Appendix B.

(b) Provide the layout of facilities. Examples of relevant information include:

- (i) A map of at least 1:12,000 scale of the electric power transmission line or gas pipeline routes and associated facilities such as substations, compressor stations, and other stations, showing the following proposed features:**

Figure 2 includes the list of items in a – c below.

- (a) Temporary and permanent access roads, staging areas, and laydown areas.**
- (b) Proposed location of major structures, including electric power transmission line poles and structures, and buildings.**
- (c) Fenced-in or secured areas.**

Please see Figure 2 in Columbia's response to the rule requirement of Adm.Code 4906-4-03(A)(b)(i) above. These locations will not be finalized until the engineering design is complete, and some changes may be needed based on field conditions during construction.

- (ii) Reasons for the proposed layout and any unusual features.**

The proposed Project route connects two existing stations. The route was chosen to navigate suburban areas while meeting industry guidelines and standards. To minimize disruption to the community and reduce impacts on the public and the surrounding environment, the design prioritizes staying within the public ROW. Furthermore, HDD crossings are proposed to minimize disruptions to the public and other utilities as well as impacts

to environmental features. There are no unusual features involved with this Project.

(iii) Plans for any future modifications in the proposed layout, including the nature and approximate timing of contemplated changes.

The proposed natural gas pipeline is designed to provide adequate capacity to meet the current needs of the system as well as a limited degree of useful reserve capacity to protect against unforeseen contingencies. Columbia does not foresee the need to modify this Project. It is part of a larger long-range plan to verify the MAOP of its transmission class facilities. The proposed Project route, currently shown to be the red and blue lines, may be shifted within the LOD identified in Appendix D and on Figure 2 and in conformance with any/all permitting restrictions imposed by the City of Columbus (or relevant municipality). Additionally, changes to the pipeline location may be required to accommodate existing underground facilities. Any reroutes outside of the corridor will be filed as an amendment to the Application, if necessary, to provide updated information.

(B) For a proposed electric generation facility:

- (1) Confirm that an interactive map on the project's website containing a one-mile radius from the project area and showing the features listed in paragraph (A)(3)(a) of rule 4906-4-03 of the Administrative Code was posted at least fourteen days before the first public informational meeting under rule 4906-3-03 of the Administrative Code and that such map will be updated and maintained until construction completes.**
- (2) Provide the area, in acres, of all owned and leased properties that will be used for construction and/or operation of the facility, and the number of properties.**
- (3) Provide, in as much detail as is available at the time of submission of the application, indicative examples of each generation equipment alternative, where applicable. Examples of relevant specifications include (subject to revision and update):**
 - (a) Type, number of units, estimated net demonstrated capacity, heat rate, annual capacity factor, and hours of annual generation.**
 - (b) Indicative manufacturers, models, specifications, and material safety data sheets for all solar panels, inverters, racking systems, wind turbine models,**

- and other material components. The actual component information shall be provided when selected and prior to commencement or construction and shall not cause an increase in impacts associated with the preliminary maximum site plan. In the case of a wind farm, final component selections shall not exceed the disclosed maximum turbine hub height, tip height, rotor diameter and blade length.
- (c) Fuel quantity and quality (i.e., ash, sulfur, and British thermal unit value).
 - (d) A list of types of pollutant emissions and estimated quantities.
 - (e) Water volume requirement, source of water, treatment, quantity of any discharge and names of receiving streams.
- (4) Describe, in as much detail as is available at the time of submission of the application, relevant information as to the construction method, site preparation and reclamation method, materials, color and texture of surfaces, dimensions, and structures included to assure safe operation of all facility components. Examples of relevant information include:
- (a) Electric power generation plant or wind-powered electric generation turbines, including towers and foundations.
 - (b) All proposed storage facilities, including those for fuel, waste, water, and hazardous chemicals.
 - (c) All proposed processing facilities, including those for fuel, waste, water, and hazardous chemicals.
 - (d) Water supply, effluent, and sewage lines.
 - (e) Associated electric collection, transmission and distribution lines and gas pipelines.
 - (f) Substations, switching substations, and transformers.
 - (g) Temporary and permanent meteorological towers.
 - (h) Transportation facilities and proposed upgrades, access roads, and crane paths.
 - (i) Construction laydown areas.
 - (j) Security, operations, and maintenance facilities or buildings.
 - (k) Other pertinent installations.
- (5) Supply a map of at least 1:12,000 scale of the project area. Examples of relevant features for map depiction include:
- (a) An aerial photograph.
 - (b) The proposed facility, including all components listed in paragraph (B)(4) of this rule.
 - (c) Road names.

(d) Property lines.

Adm.Code 4906-4-03(B)(1)–(5) does not apply to this Project.

(C) For a proposed electric power transmission line or gas pipeline:

(1) Provide a statement explaining the need for the proposed facility, including a listing of the factors upon which it relied to reach that conclusion and references to the most recent long-term forecast report (if applicable). Examples of information relevant to the need determination include:

(a) The purpose of the proposed facility.

The purpose of the Project is to further Columbia's efforts to meet mandates of the PHMSA rule changes in 49 C.F.R. 191 and 192, commonly referred to as the "PHMSA Mega Rule."

As described in the Direct Testimony of Brent Shuler in Case No. 25-1129-GA-ALT, *et al.*, the PHMSA Mega Rule is a set of regulations published by PHMSA that became effective in July of 2020. The Mega Rule enhances safety regulations for onshore gas transmission pipelines and establishes required actions by pipeline operators. Part 1 of the PHMSA Mega Rule sets requirements for maximum allowable operating pressure ("MAOP") reconfirmation and verification of pipeline materials. The Mega Rule provides guidance to operators regarding records requirements for all transmission pipelines newly installed after July 1, 2020. It also describes requirements for reconfirming the MAOP of pipelines and facilities installed before July 1, 2020, that are in certain class locations or HCAs and lack certain TVC records such as material attributes and sufficient pressure test records. Operators have until 2035 to comply with these measures, but at least 50% of the work in scope must be completed by July 2028.

Transmission pipelines installed prior to July 1, 2020, must have a pressure test that meets the requirements in each of the TVC definitions described below.

- Traceable records are those which can be clearly linked to original information about a pipeline segment or facility. Traceable records might include pipe mill records, which include mechanical and chemical

properties; purchase requisition; or as-built documentation indicating minimum pipe yield strength, seam type, wall thickness and diameter.

- Verifiable records are those in which information is confirmed by other complementary, but separate, documentation. Verifiable records might include contract specifications for a pressure test of a pipeline segment complemented by pressure charts or field logs.
- Complete records are those in which the record is finalized as evidenced by a signature, date, or other appropriate marking, such as a corporate stamp or seal. For example, a complete pressure testing record should identify a specific segment of pipe, who conducted the test, the duration of the test, the test medium, temperatures, accurate pressure readings, and elevation information as applicable.

Columbia uses these definitions as it reviews all applicable records for pipelines to determine whether MAOP reconfirmation will be necessary, due to a record(s) that does not meet the TVC guidelines.

All the 20-inch pipe that is being retired and replaced through the Project is in a Class 3 location and is a High Consequence Area. The 12-inch pipe that is being installed through the Project is being installed in a Class 3 location. Columbia has elected to replace pipeline as a part of this Project to comply with the PHMSA Mega Rule.³

(b) Specific projections of system conditions, local requirements, or any other pertinent factors that impacted the applicant’s opinion on the need for the proposed facility.

As further described in the Direct Testimony of Brent Shuler in Case No. 25-1129-GA-ALT, *et al.* and in response to Adm.Code 4906-4-03(C)(1)(a), Columbia has elected to complete this Project to replace a portion of its existing system to comply with the PHMSA Mega Rule.⁴ Additionally, Columbia has elected to replace the pipeline as a part of this Project because some of the

³ See *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Rate Plan*, Case Nos. 23-0046-GA-ALT, *et al.*, Staff Report at 10 (July 7, 2023).

⁴ See *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation*, Case Nos. 25-1129-GA-ALT, *et al.*, Prepared Direct Testimony of Brent Shuler on Behalf of Columbia Gas of Ohio, Inc. (December 29, 2025).

segments of pipeline are of such an age and condition that replacement is warranted. Many segments of the NCHP system were installed in the 1950s. Additionally, the fact that various segments of the NCHP system were joined using the “welded & coupled” method indicates the unlikelihood of a hydrostatic pressure test being successful. Testing of this transmission-class pipeline would require depressurizing the line, which would require significant efforts to bypass those facilities to maintain service to customers. The bypass of those facilities would necessitate a high volume of pipeline stopple & bypass fittings in addition to temporary regulator station equipment and staging areas through congested areas of Columbus not conducive to this nature of construction. Therefore, replacement is the best means to provide safe and reliable service.

(c) Relevant load flow studies and contingency analyses, if appropriate, identifying the need for system improvement.

Columbia utilizes a commercially available, customizable, steady-state modeling software called Synergi Gas to represent and optimize its natural gas pipeline system. The software was originally developed by Stoner Associates. It is regarded as one of the premier modeling engines for pipeline simulation. Model simulations portray the behavior of real-life systems and permit the testing of experimental changes to said systems without the expense, time, or cost of actually testing pipelines in the ground.

The Synergi model contains critical energy infrastructure information, trade secret, and business confidential information. Columbia will make the Synergi analyses available on a confidential basis to Ohio Power Siting Board Staff.

(2) Describe why the proposed facility was selected to meet the projected need and how the facility complies with R.C. 4906.10(A)(6).

Please refer to Columbia’s descriptions in Adm.Code 4906-4-03(C)(1)(a), (b), and (c) for a description of the projected need for the Project as well as how the Project will serve the public interest, convenience, and necessity. Please refer to Columbia’s explanations set forth in Adm.Code 4904-4-04 as to how the Project was selected.

(D) For a proposed electric power transmission line, provide information in support of the basis of need. Examples of information relevant to the need determination include:

- (1) Load flow data depicting system performance with and without the proposed facility.**
- (2) An analysis of the impact of the proposed facility on the electric power system economy and reliability, including the evaluation of the impact of the proposed facility on all interconnected utility systems as supported by relevant load flow studies that the applicant provides to staff.**
- (3) An analysis and evaluation of the options considered that would eliminate the need for construction of an electric power transmission line, including electric generation options and options involving changes to existing and planned electric transmission substations.**
- (4) A brief statement of how the proposed facility fits into the applicant's most recent long-term electric forecast report and the regional plans for expansion, including, but not limited to, the following:**
 - (a) Reference to any description of the proposed facility in the most recent long-term electric forecast report of the applicant.**
 - (b) If no description was contained in the most recent long-term electric forecast report, an explanation as to why none was filed in the most recent long-term electric forecast report.**
 - (c) Reference to regional expansion plans, when applicable (if the electric power transmission line will not affect regional plans, the applicant shall so state).**

Adm.Code 4906-4-03(D) does not apply to this Project.

(E) For a proposed gas pipeline project:

- (1) Provide one copy in electronic format of the relevant base case system data on a portable solid-state drive, in a format acceptable to the board staff, with a description of the analysis program and the data format.**

Columbia's models contain critical energy infrastructure information, trade secret, and business confidential information which is not in a format that is transferrable in this manner. Columbia will make these studies available on a confidential basis to Ohio Power Siting Board Staff via a meeting.

- (2) Unless exempt from filing a long-term forecast report, provide a brief statement of how the proposed facility fit into regional expansion plans and the applicant's most recent long-term gas forecast report, including the following:**

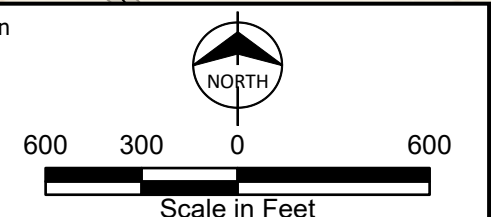
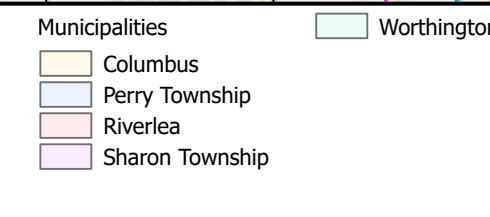
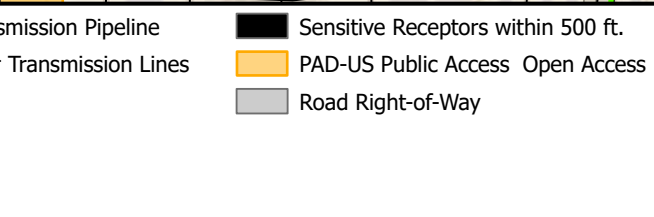
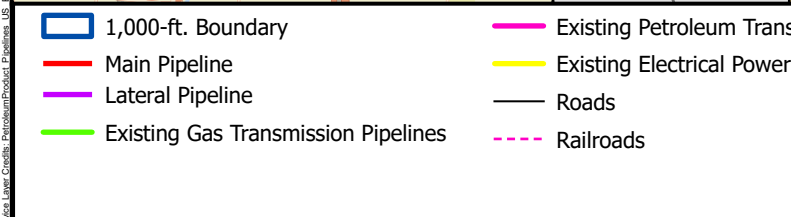
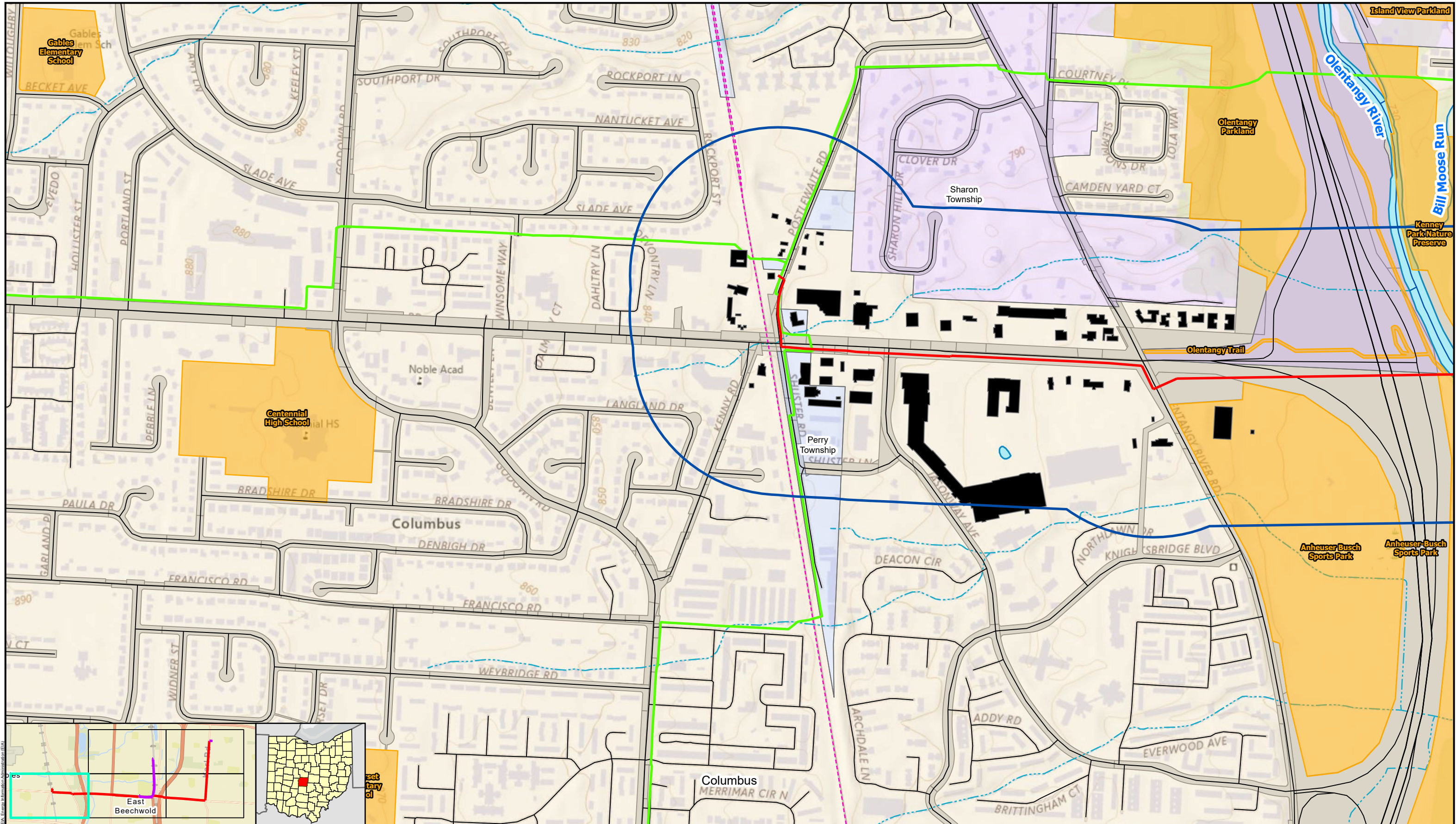
(a) Reference to any description of the proposed facility in the most recent long-term gas forecast report of the applicant.

Pursuant to R.C. 4929.04(A), a natural gas company may seek an exemption from Chapter 4935, with the exception of R.C. 4935.01 and 4935.03. R.C. 4935.04(C) requires a person owning or operating a major utility facility in Ohio or furnishing natural gas to submit a long-term forecast report. Columbia submitted an exemption application on January 30, 2009, in Case No. 08-1344-GA-EXM, and this exemption was approved by Opinion and Order of the Public Utilities Commission of Ohio (“the Commission”) on December 2, 2009. Columbia likewise filed a motion to modify the Commission’s Order in Case No. 12-2637-GA-EXM on October 4, 2012. This motion to modify was approved by Opinion and Order of the Commission on January 9, 2013. Columbia’s approved exemption remains in effect today and, as such, Columbia is exempt from filing a long-term forecast.

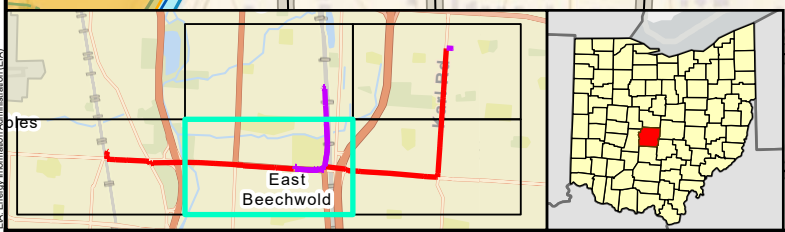
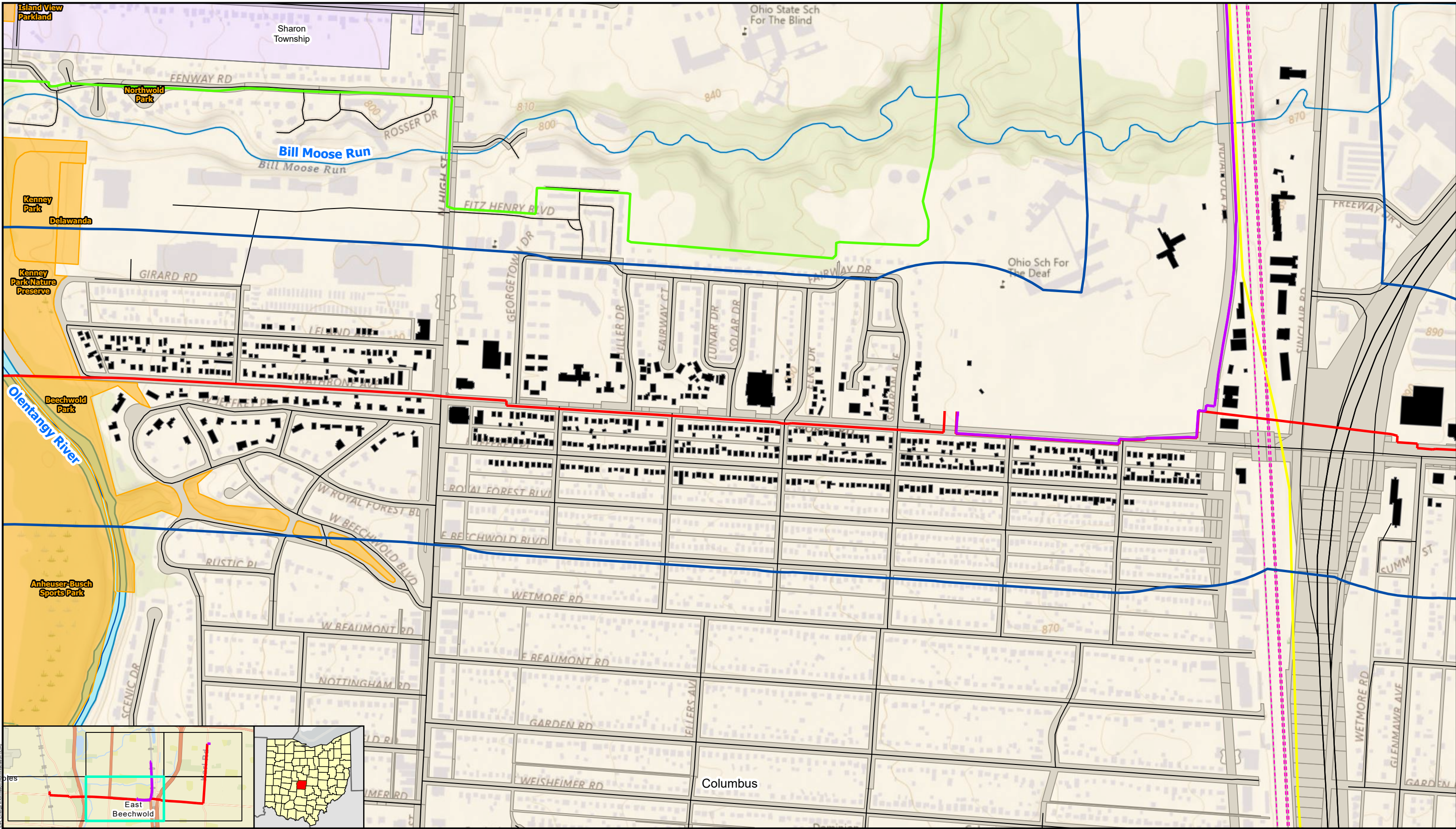
(b) If no description was contained in the most recent long-term gas forecast report, an explanation as to why none was filed in the most recent long-term gas forecast report.

Adm.Code 4906-4-03(E)(2)(b) does not apply to this Project for the reasons explained in response to Adm.Code 4906-4-03(E)(2)(a).

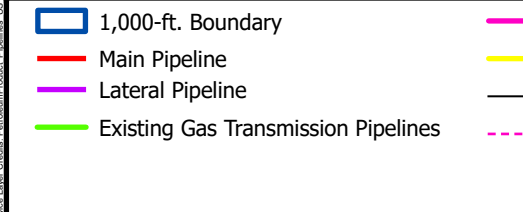
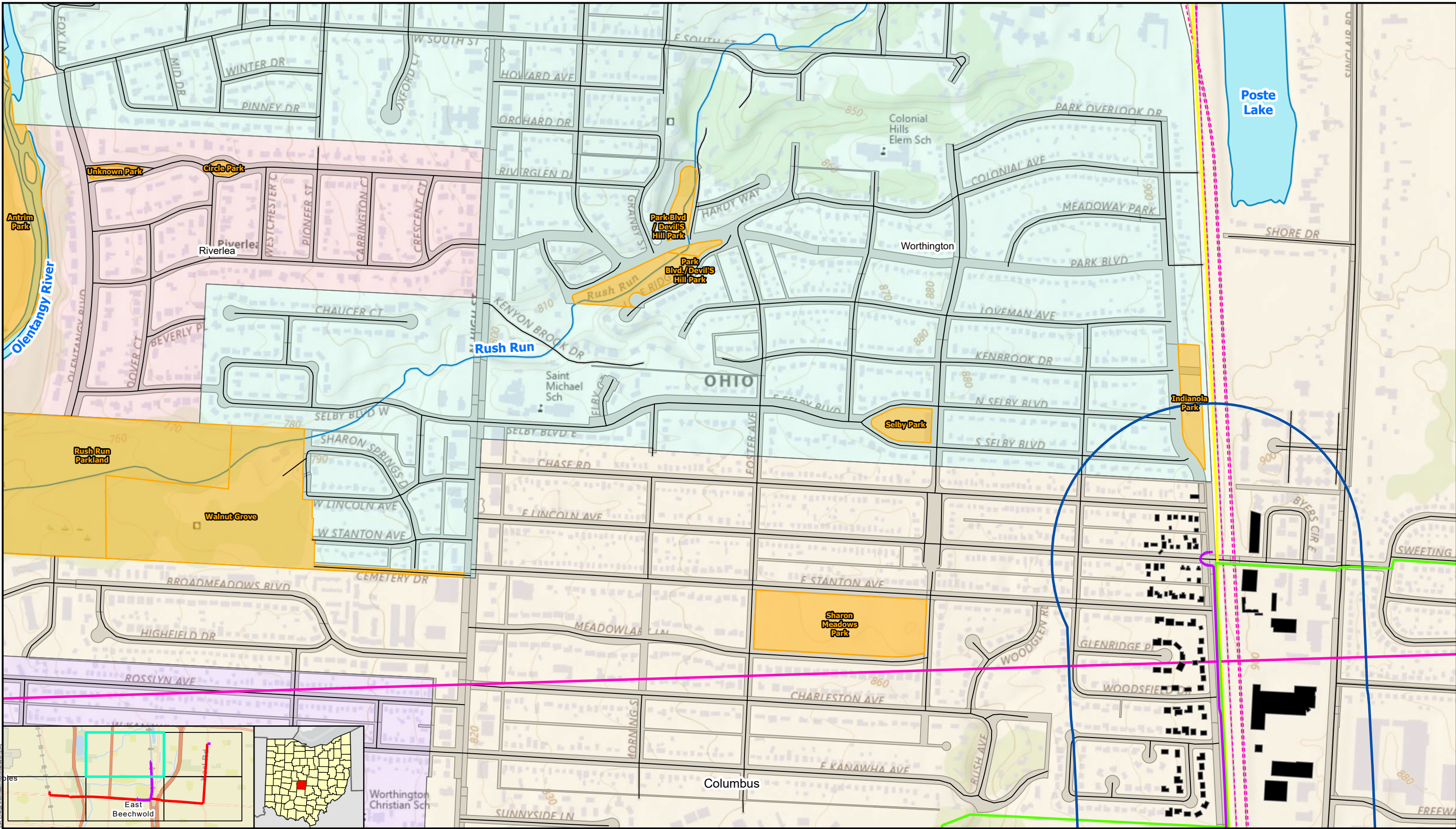
FIGURE 1
General Vicinity Map




General Vicinity Map
Woodward Park
North Columbus High Pressure (NCHP)
System Pipeline Project
Franklin County, OH
Page 1 of 5



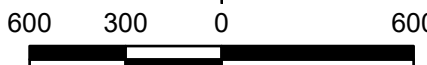
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<ul style="list-style-type: none"> 1,000-ft. Boundary 	<ul style="list-style-type: none"> Existing Petroleum Transmission Pipeline 	<ul style="list-style-type: none"> Sensitive Receptors within 500 ft. 	<ul style="list-style-type: none"> Municipalities 	<ul style="list-style-type: none"> Worthington
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<ul style="list-style-type: none"> Lateral Pipeline 	<ul style="list-style-type: none"> Roads 	<ul style="list-style-type: none"> Road Right-of-Way 	<ul style="list-style-type: none"> Perry Township 	
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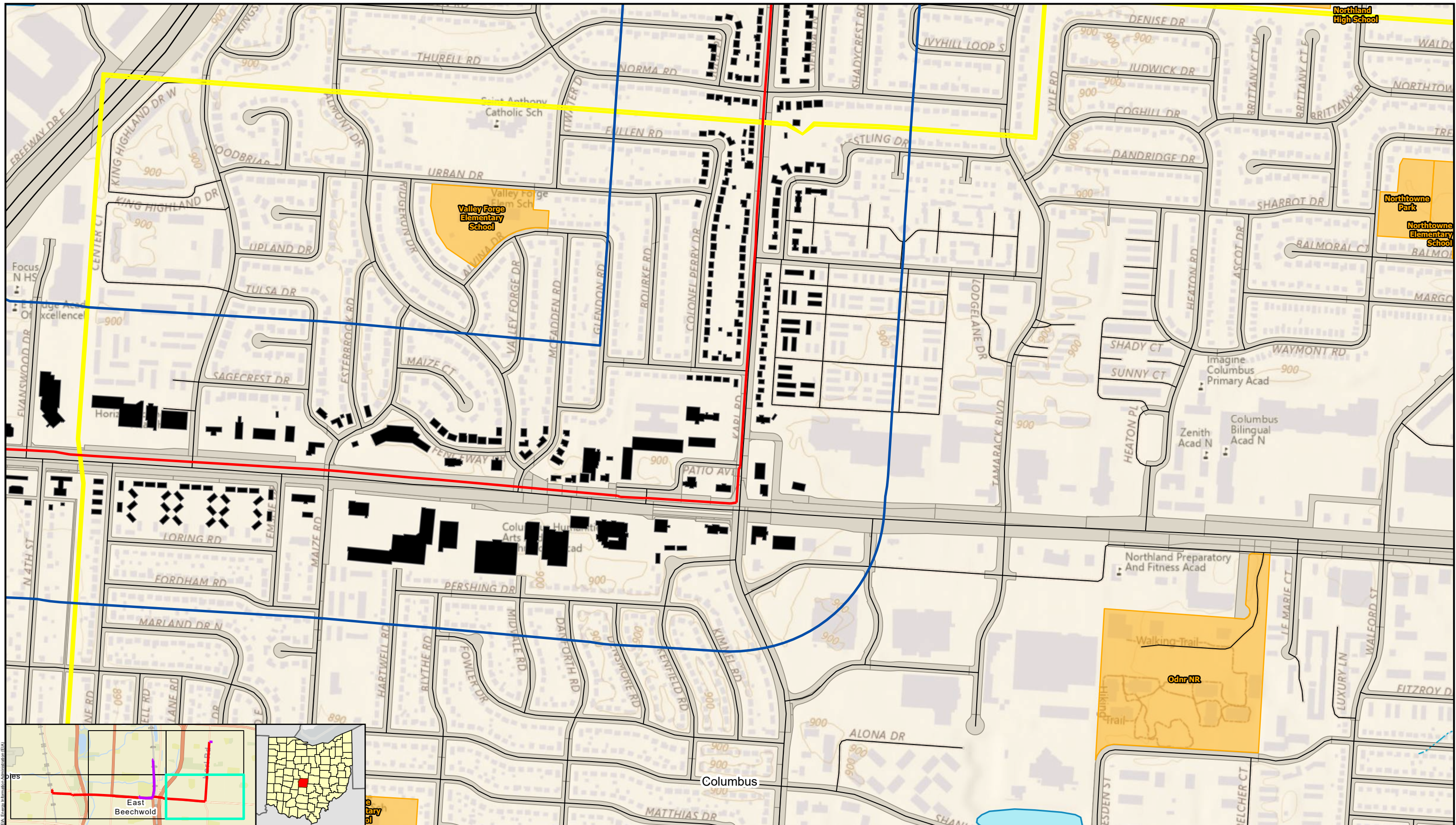
NORTH



600 300 0 600
Scale in Feet



General Vicinity Map
Woodward Park
North Columbus High Pressure (NCHP)
System Pipeline Project
Franklin County, OH
Page 3 of 5



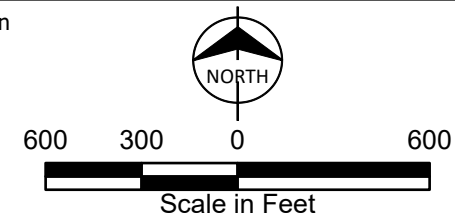
- 1,000-ft. Boundary
- Main Pipeline
- Lateral Pipeline
- Existing Gas Transmission Pipelines

- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines
- Roads
- Railroads

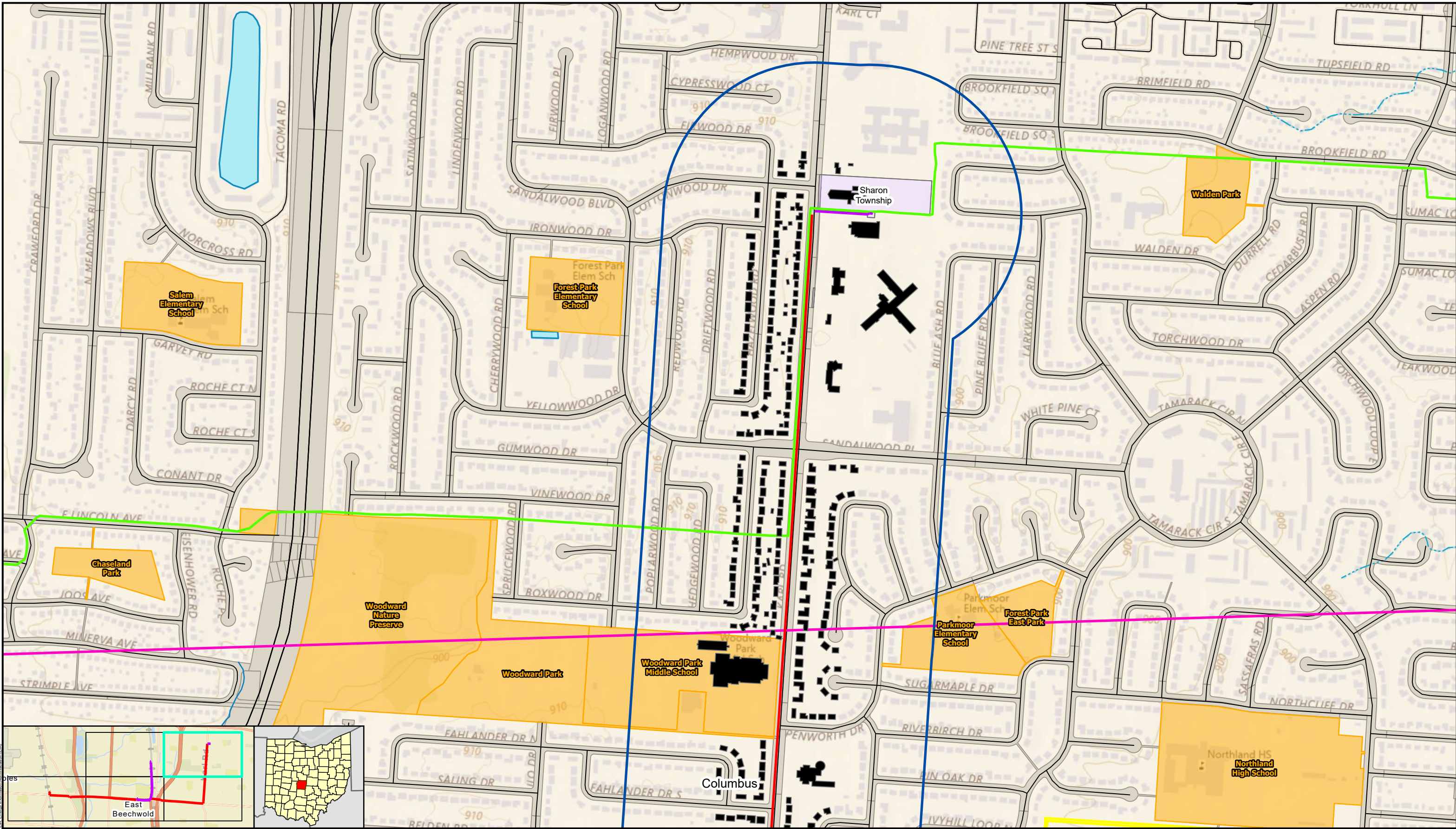
- Sensitive Receptors within 500 ft.
- PAD-US Public Access Open Access
- Road Right-of-Way

- Municipalities
- Columbus
 - Perry Township
 - Riverlea
 - Sharon Township

Worthington



General Vicinity Map
 Woodward Park
 North Columbus High Pressure (NCHP)
 System Pipeline Project
 Franklin County, OH
 Page 4 of 5




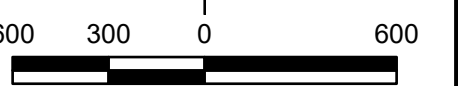

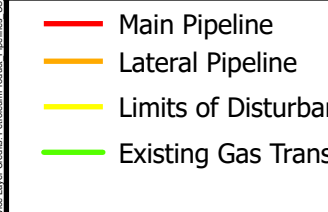
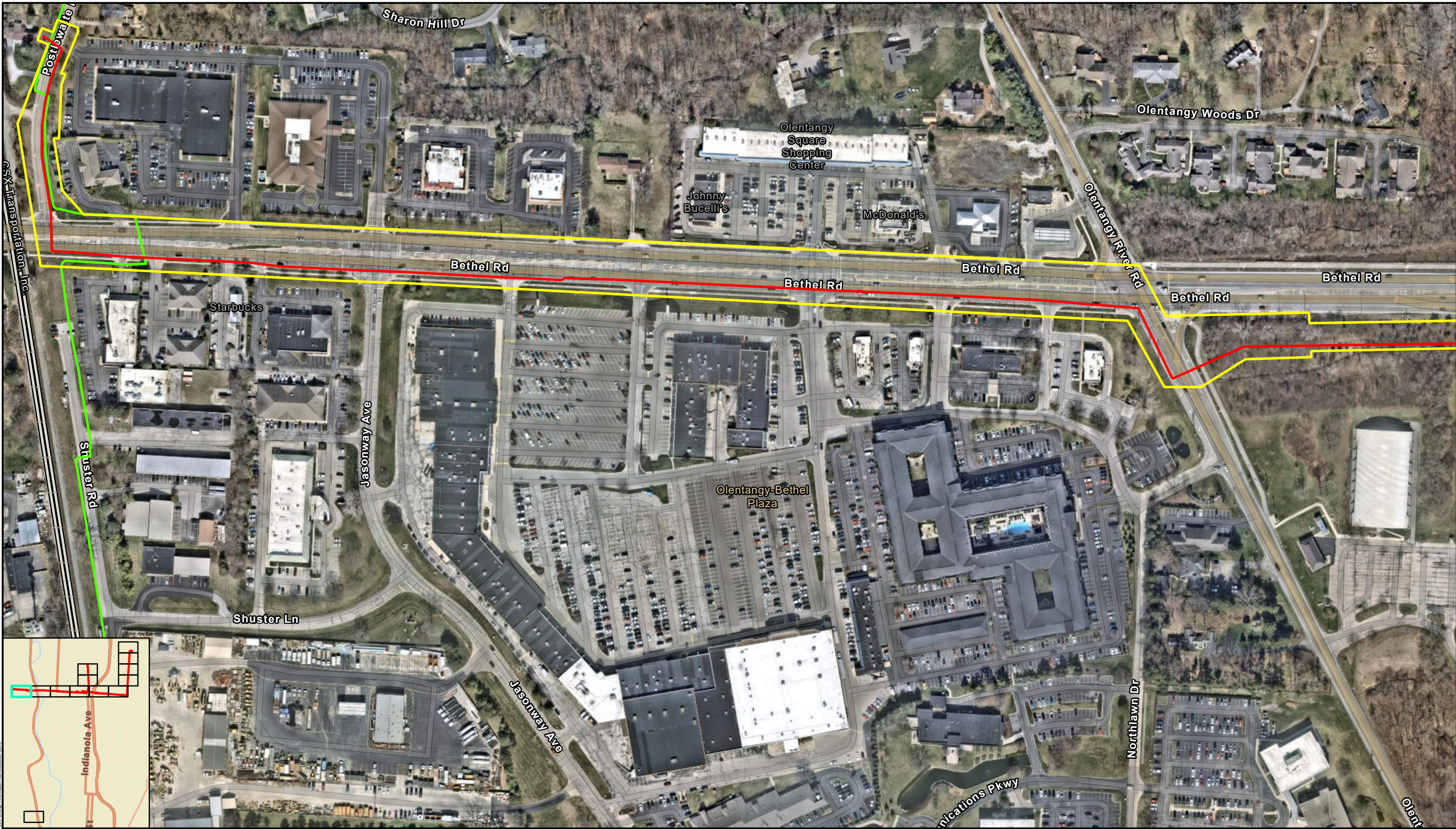
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FIGURE 2
Facilities Layout Map

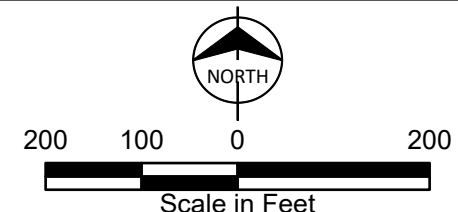


- Main Pipeline
- Lateral Pipeline
- Limits of Disturbance
- Existing Gas Transmission Pipelines

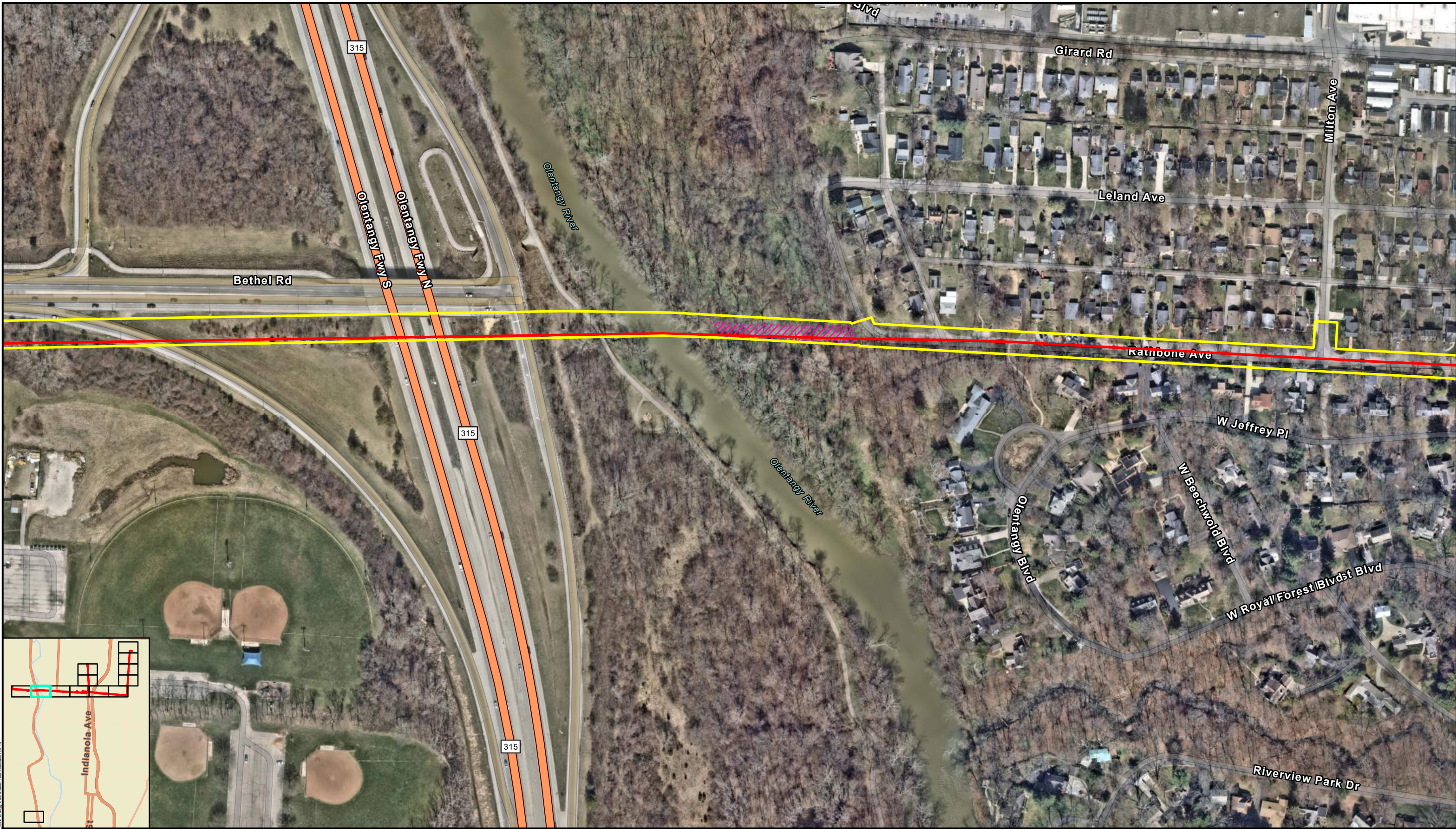
- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines

- Workspace
- ▨ Permanent
- ▨ Temporary
- ▨ Access

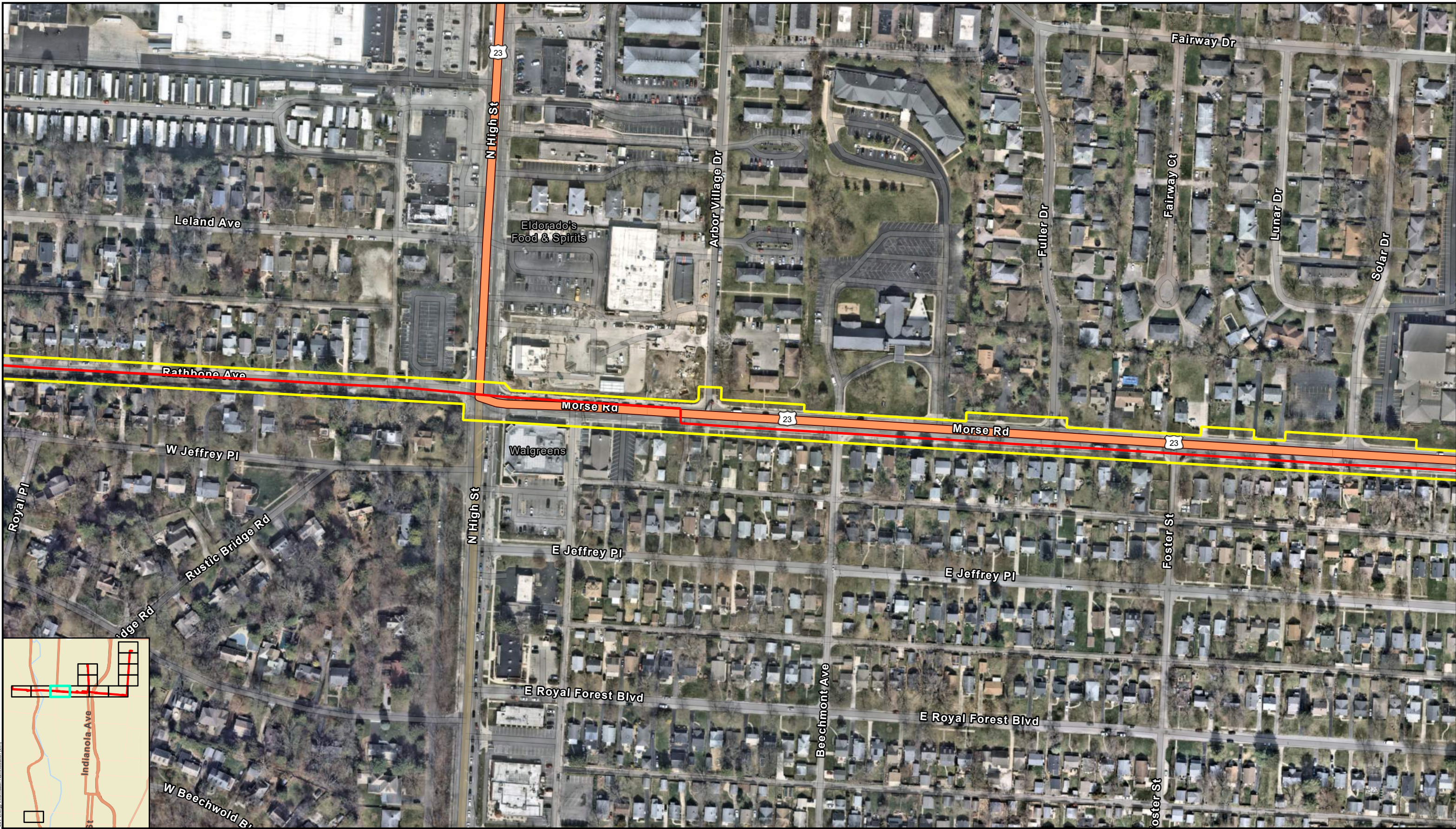
- ▨ Laydown Yard



Facilities Layout Map
 NiSource NCHP Woodward Park
 Pipeline System Project
 Franklin County, OH
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<ul style="list-style-type: none"> — Main Pipeline — Lateral Pipeline — Limits of Disturbance — Existing Gas Transmission Pipelines 	<ul style="list-style-type: none"> — Existing Petroleum Transmission Pipeline — Existing Electrical Power Transmission Lines 	<p>Workspace</p> <ul style="list-style-type: none"> ▨ Permanent ▨ Temporary ▨ Access 	<ul style="list-style-type: none"> ▨ Laydown Yard 	<p>Scale in Feet</p>		<p>Facilities Layout Map NiSource NCHP Woodward Park Pipeline System Project Franklin County, OH Page 2 of 13</p>
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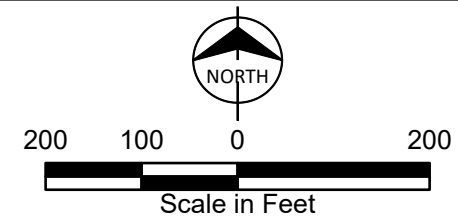


- Main Pipeline
- Lateral Pipeline
- Limits of Disturbance
- Existing Gas Transmission Pipelines

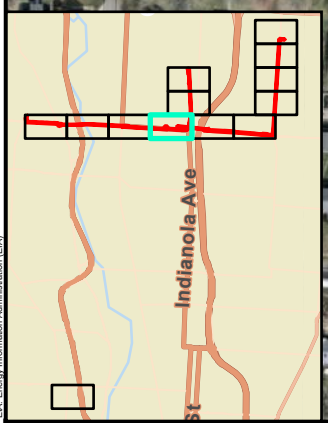
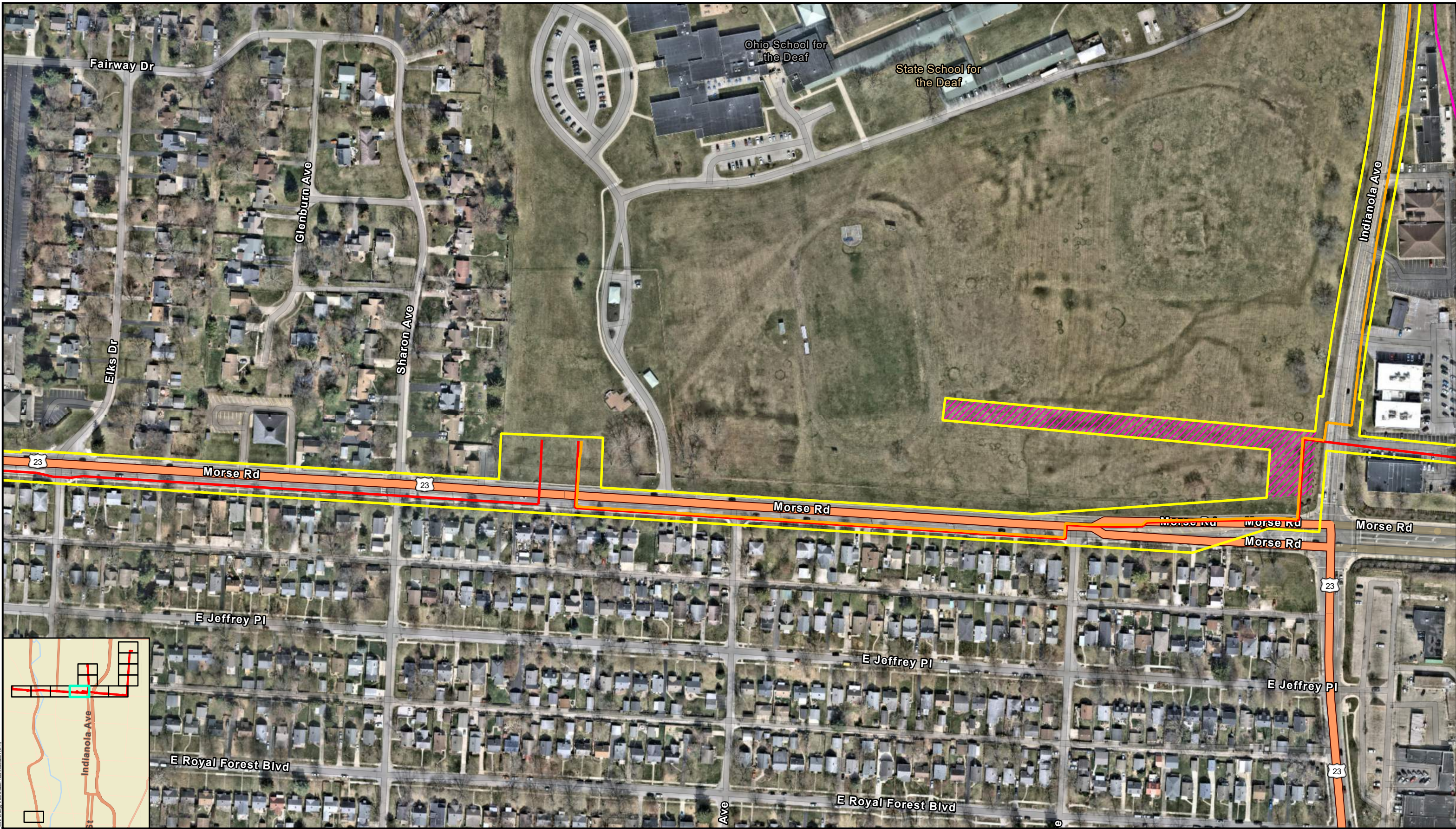
- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines

- Workspace
- ▨ Permanent
 - ▨ Temporary
 - ▨ Access

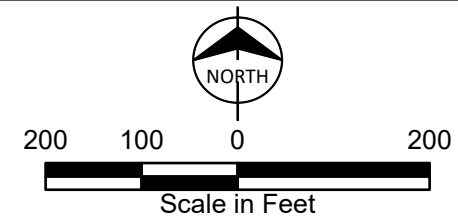
- ▨ Laydown Yard



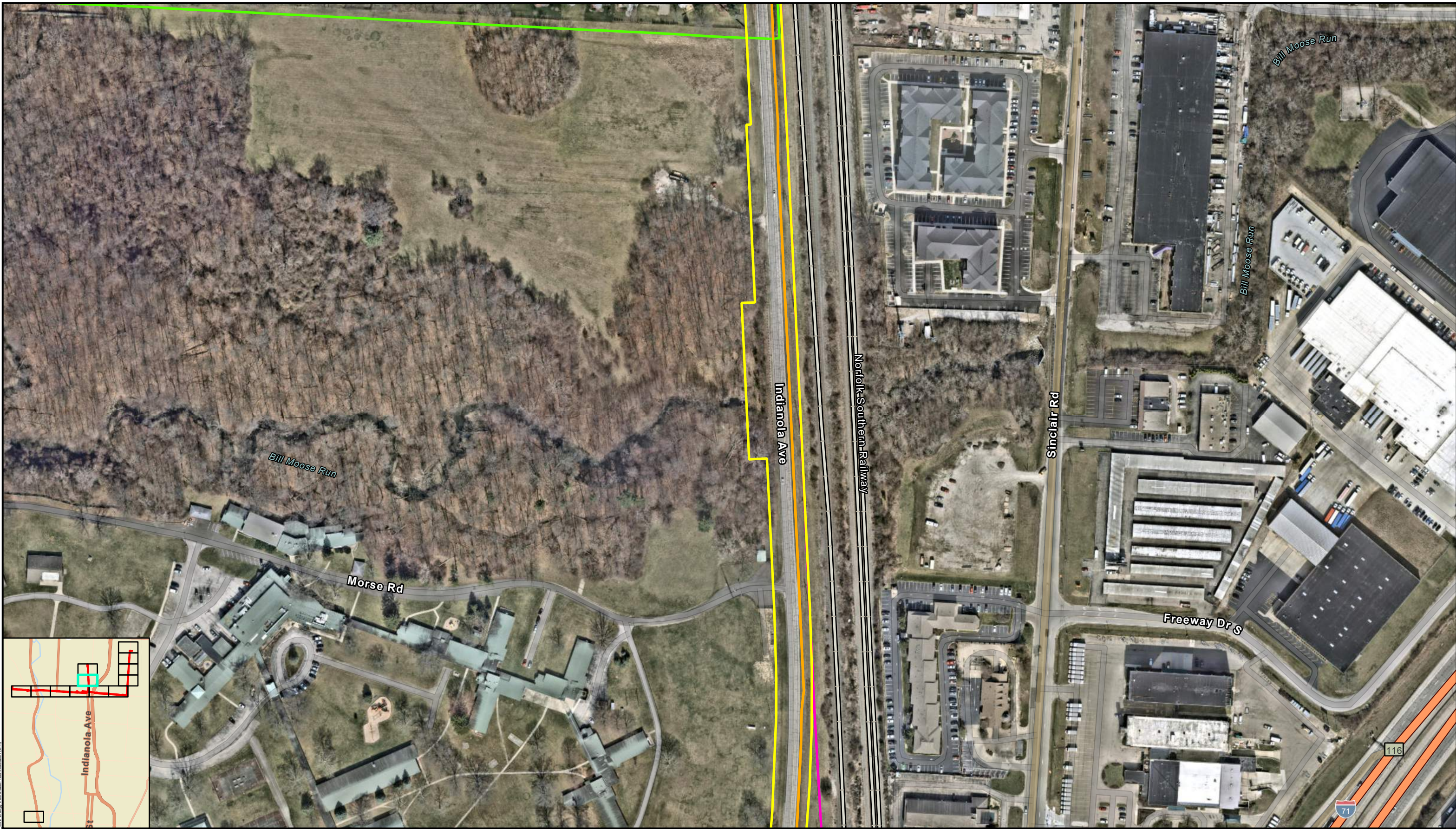
Facilities Layout Map
 NiSource NCHP Woodward Park
 Pipeline System Project
 Franklin County, OH
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- Main Pipeline
- Lateral Pipeline
- Limits of Disturbance
- Existing Gas Transmission Pipelines
- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines
- Workspace
 - Permanent
 - Temporary
 - Access
- Laydown Yard



Facilities Layout Map
 NiSource NCHP Woodward Park
 Pipeline System Project
 Franklin County, OH
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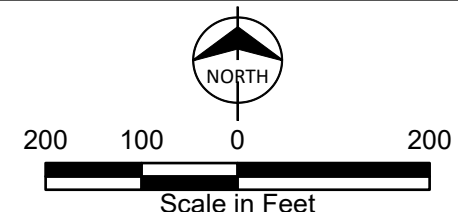
Source Layer Credits: PetroleumProduction, Pipelines, US, EIA, Energy Information Administration (EIA)

- Main Pipeline
- Lateral Pipeline
- Limits of Disturbance
- Existing Gas Transmission Pipelines

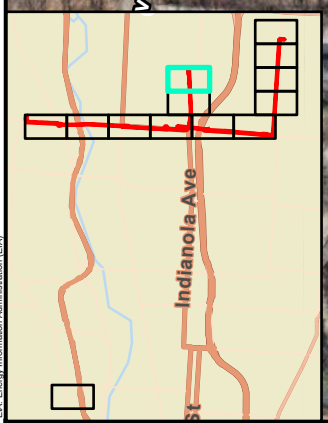
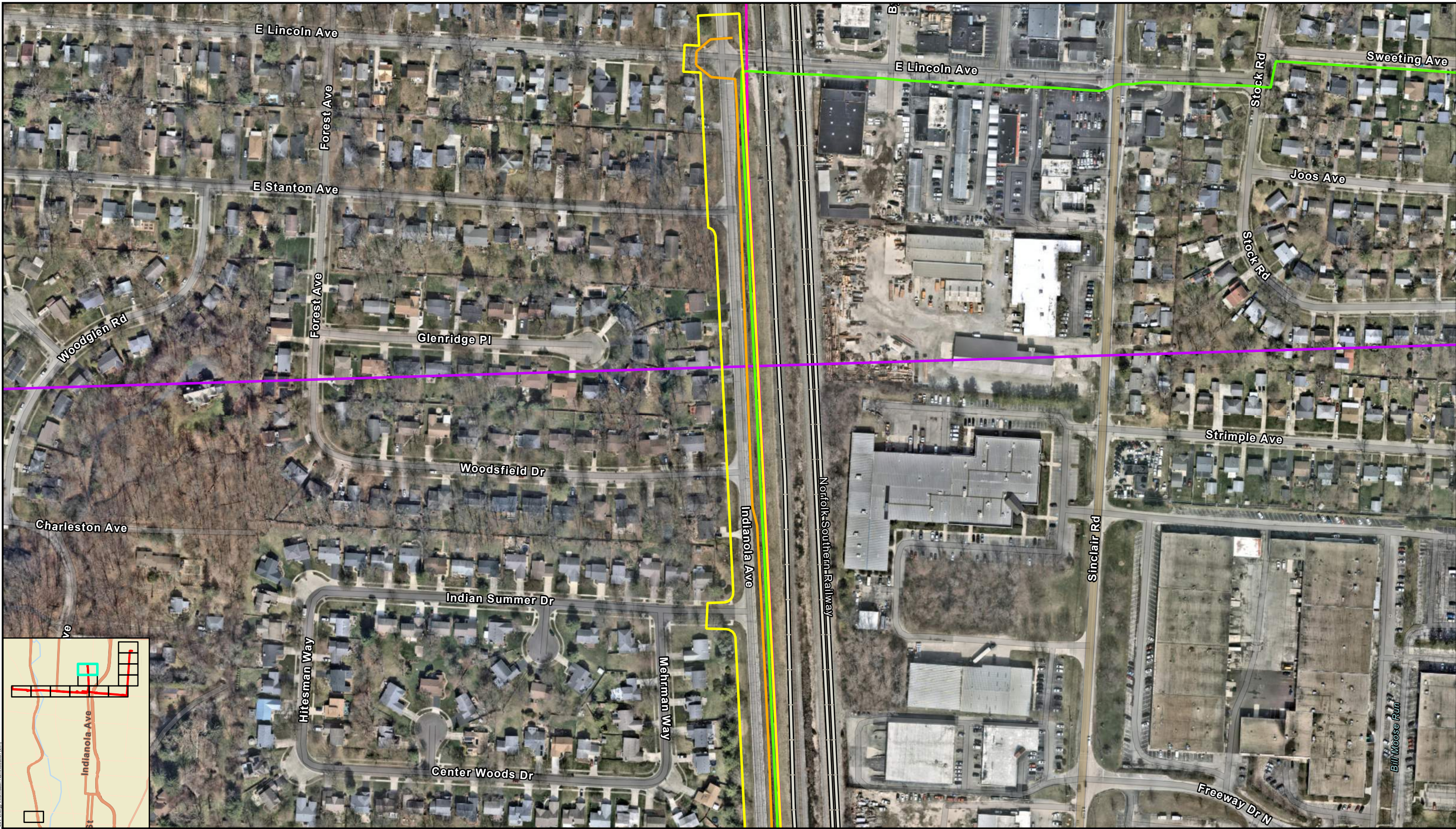
- Existing Petroleum Transmission Pipelines
- Existing Electrical Power Transmission Lines

- Workspace
- ▨ Permanent
 - ▨ Temporary
 - ▨ Access

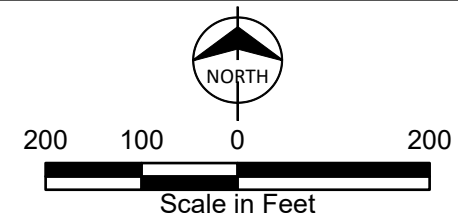
▨ Laydown Yard




Facilities Layout Map
 NiSource NCHP Woodward Park
 Pipeline System Project
 Franklin County, OH
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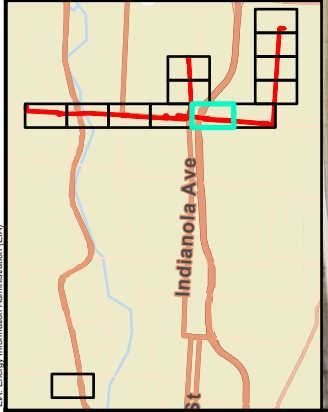
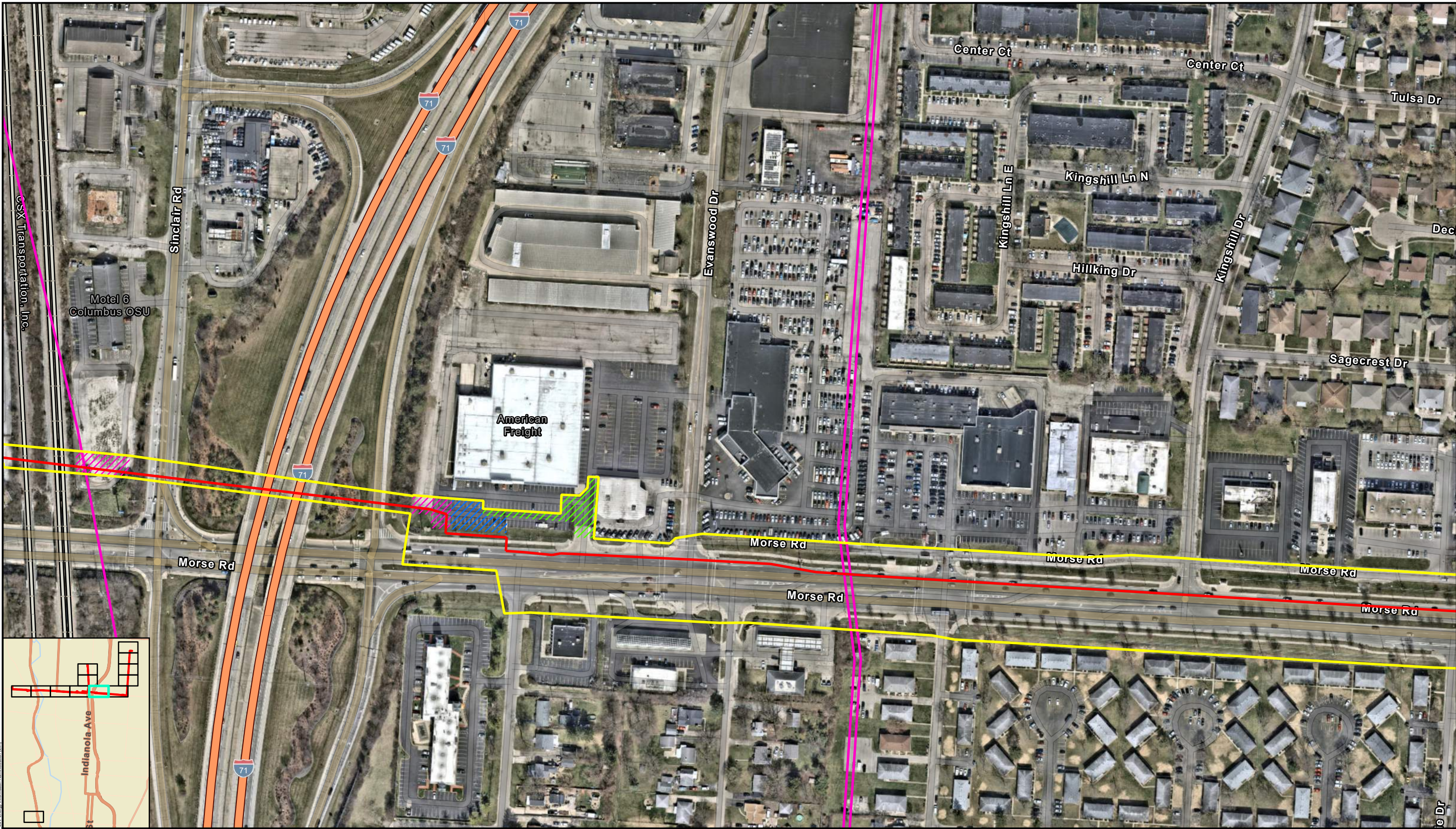


- Main Pipeline
- Lateral Pipeline
- Limits of Disturbance
- Existing Gas Transmission Pipelines
- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines
- Workspace
 - Permanent
 - Temporary
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- Laydown Yard

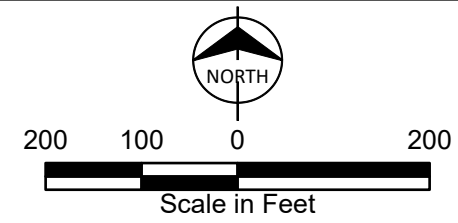




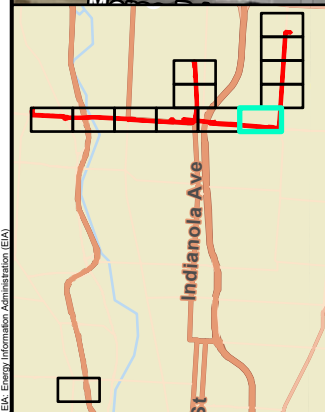
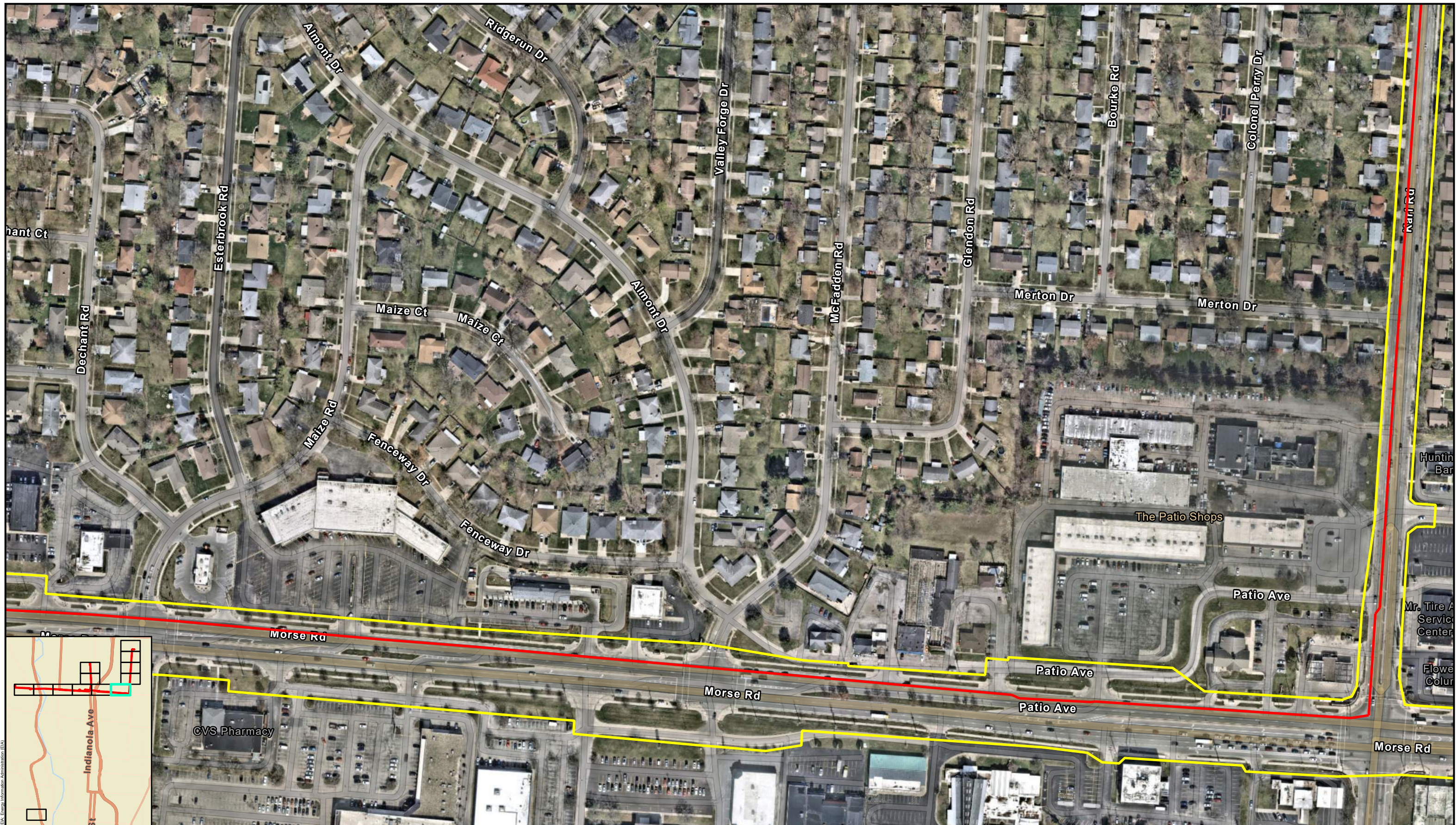
Facilities Layout Map
 NiSource NCHP Woodward Park
 Pipeline System Project
 Franklin County, OH
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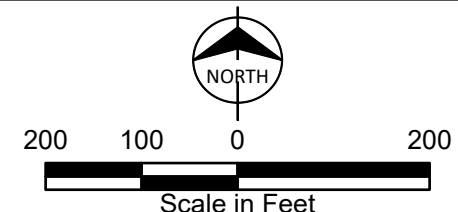
- Main Pipeline
- Lateral Pipeline
- Limits of Disturbance
- Existing Gas Transmission Pipelines
- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines
- Workspace
 - Permanent
 - Temporary
 - Access
- Laydown Yard



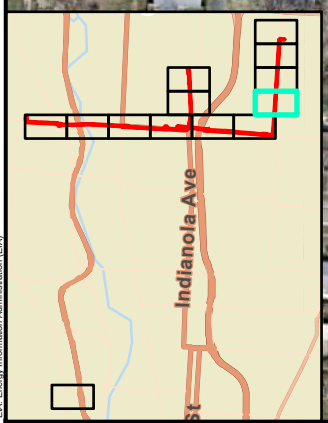
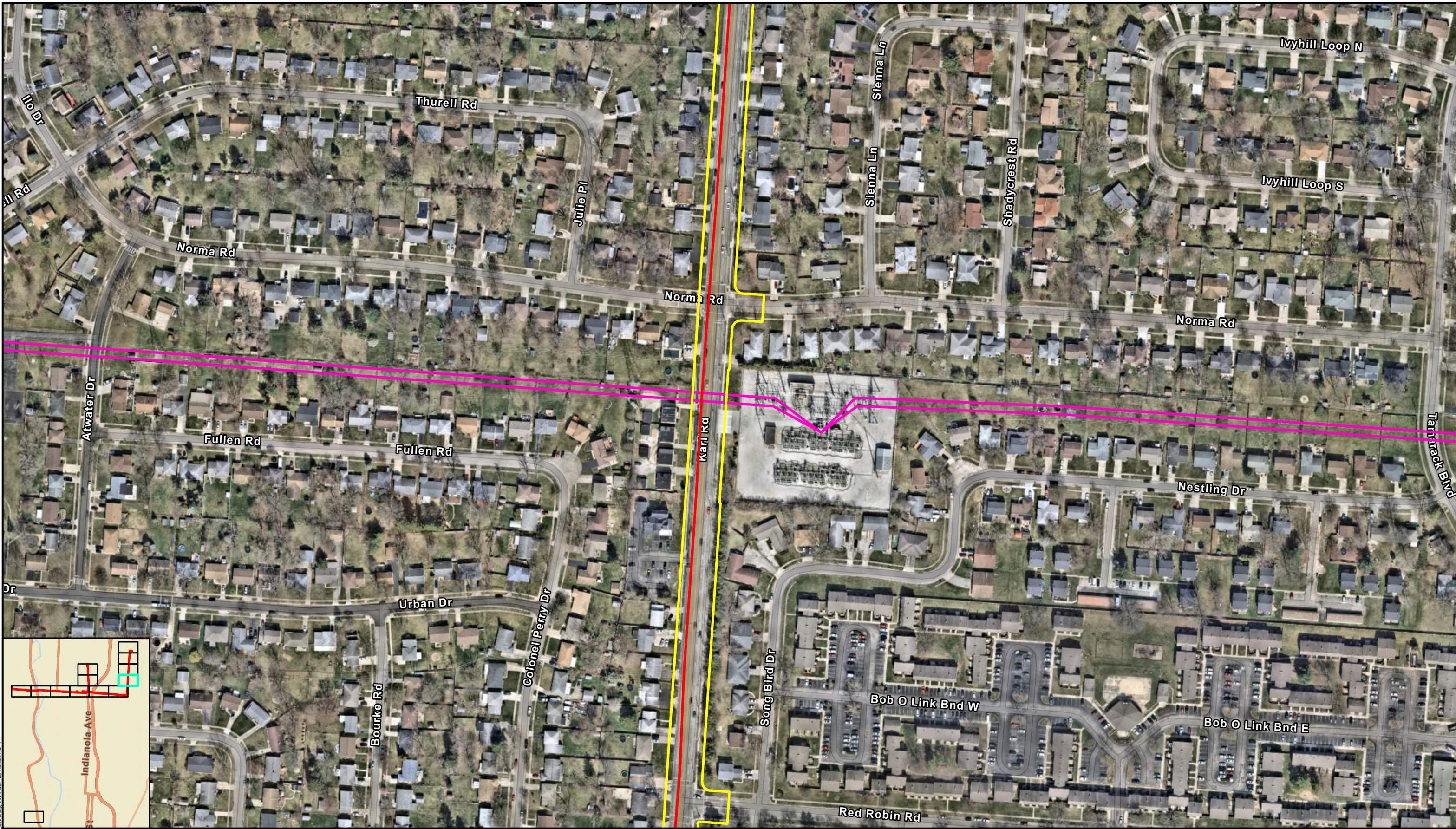
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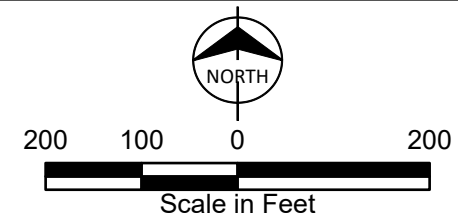
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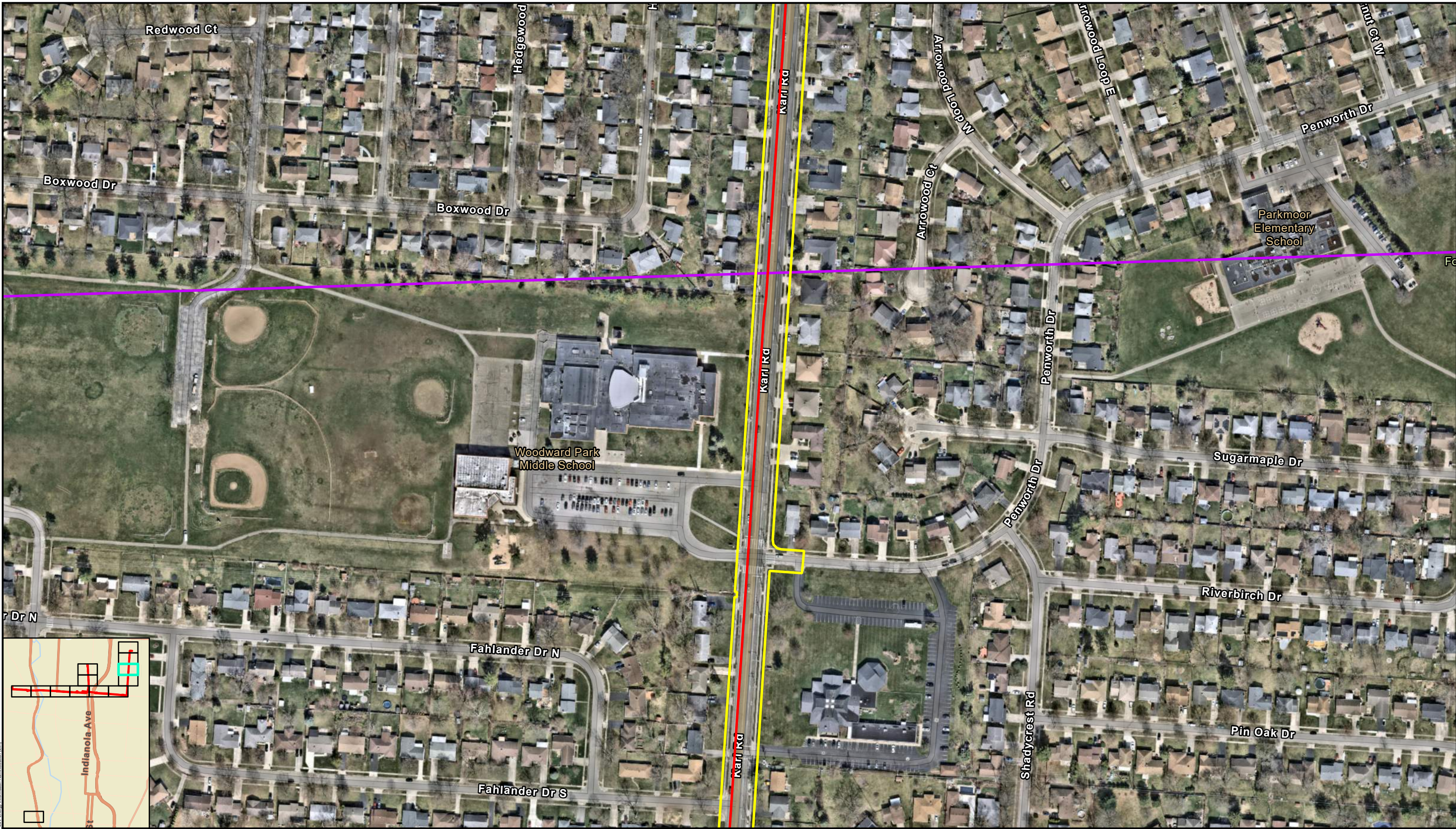
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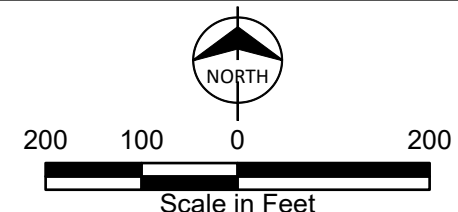
Source: NiSource, Burns & McDonnell, USEIA, and ESRI.

- Main Pipeline
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- Existing Gas Transmission Pipelines

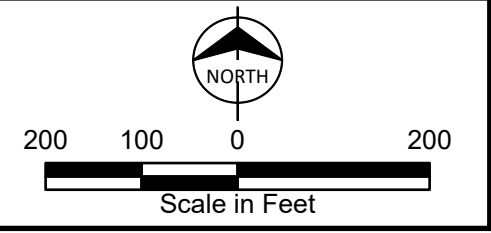
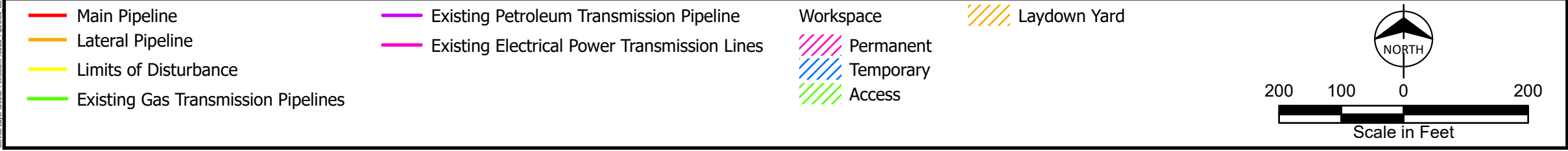
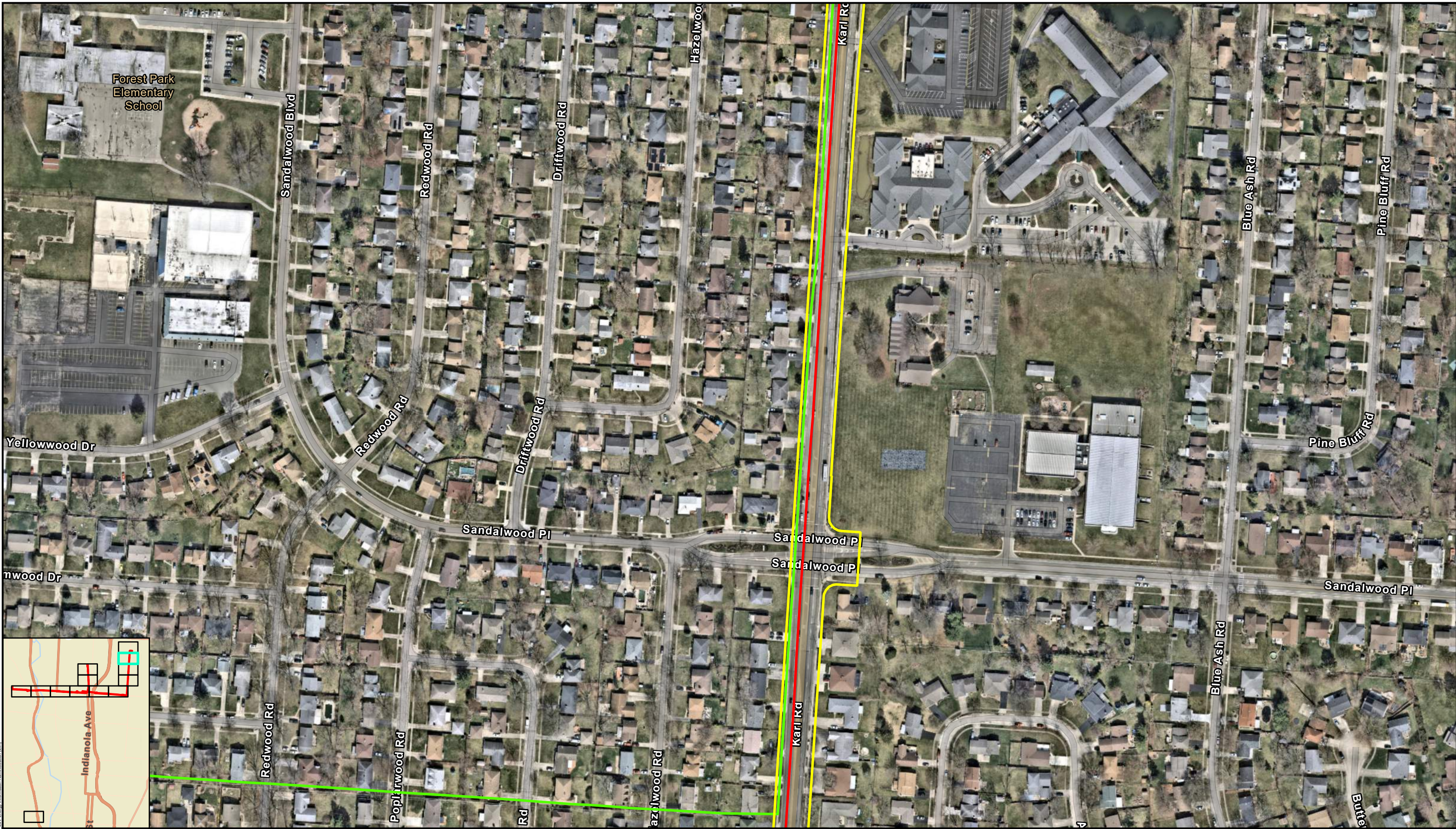

- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines

- Workspace
- Permanent
 - Temporary
 - Access

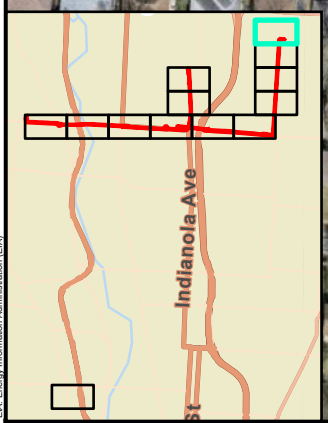
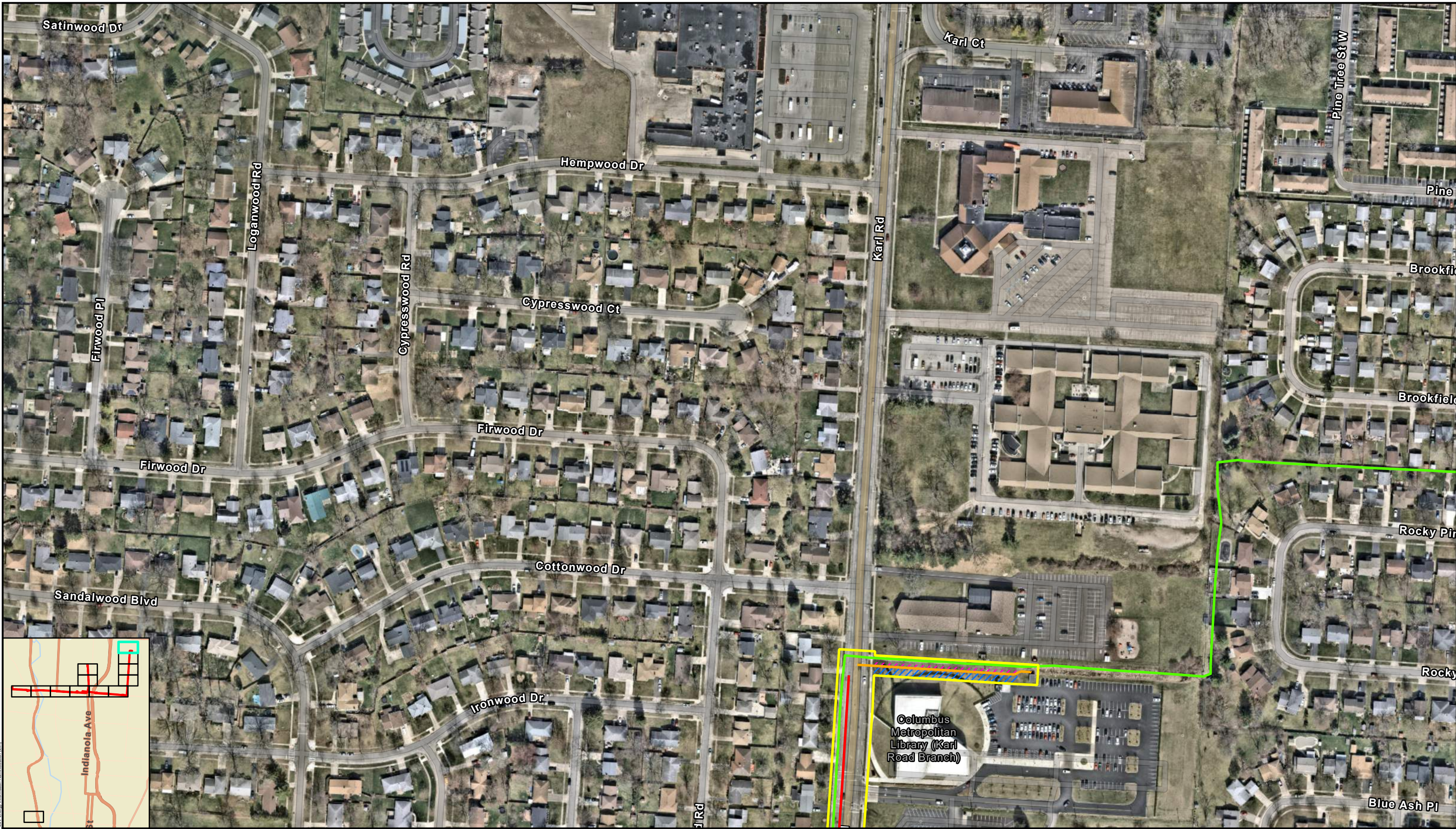
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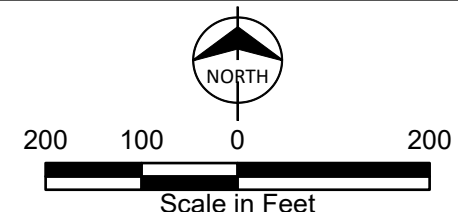


- Main Pipeline
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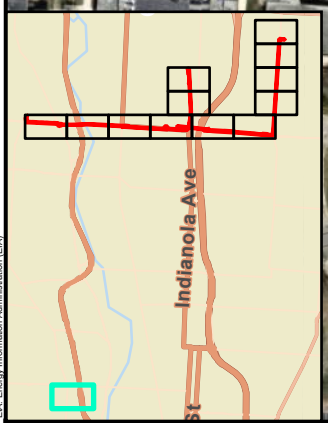
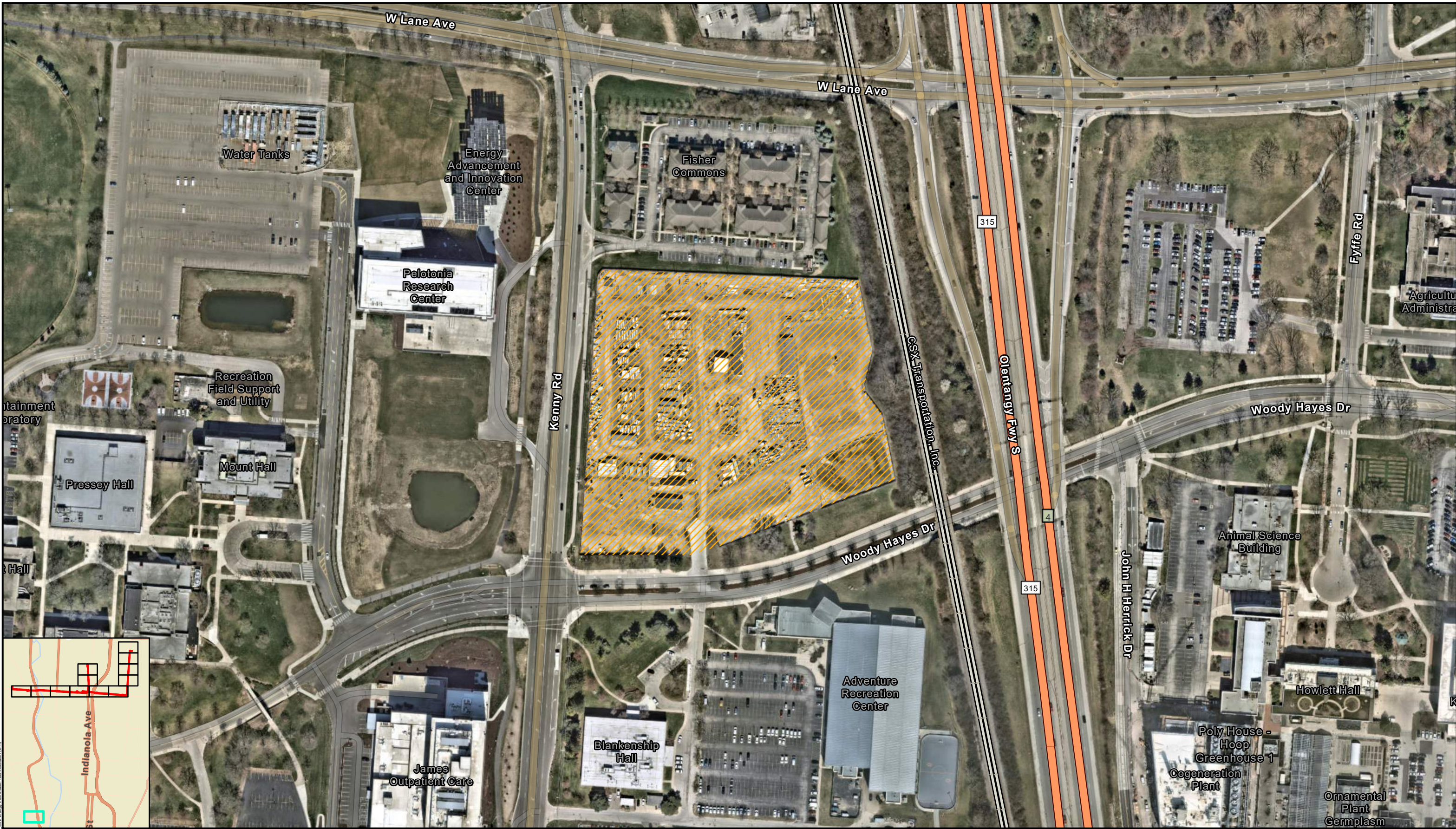
- Existing Petroleum Transmission Pipeline
- Existing Electrical Power Transmission Lines

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 - Access

- Laydown Yard



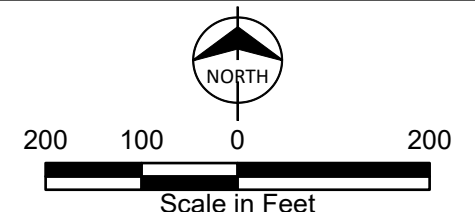
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