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August 22, 2025

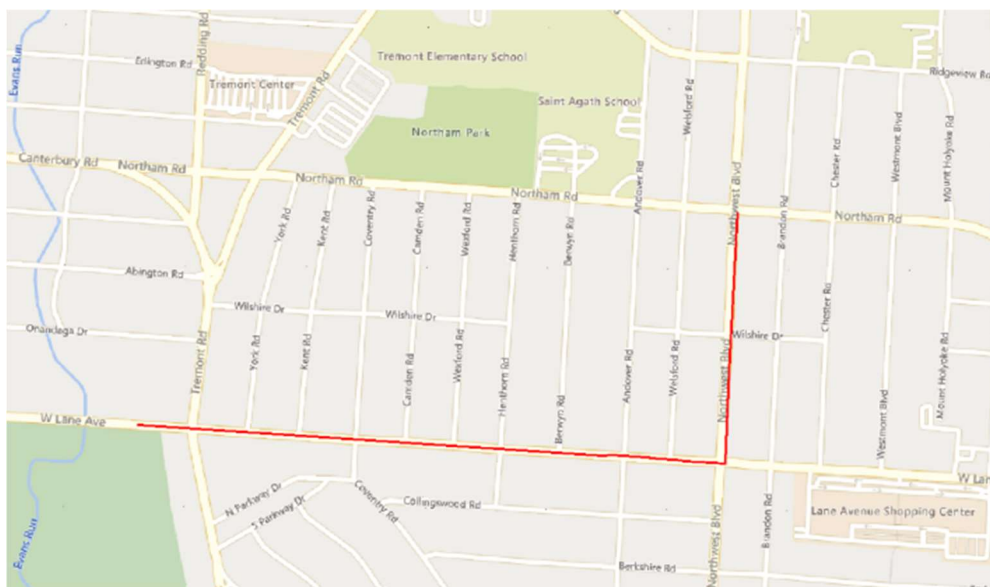
Ms. Tanowa Troupe
Secretary, Office of Administration
Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

RE: *In the Matter of the Letter of Notification Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the Adjustment to West-Central NCHP Pipeline Project*
OPSB Case No. 25-0809-GA-BLN

Dear Ms. Troupe:

Columbia Gas of Ohio, Inc. ("Columbia") submits this Letter of Notification, pursuant to R.C. 4906.03(F)(3) and Adm.Code 4906-6, concerning a proposed pipeline project known as the Adjustment to West-Central NCHP Pipeline Project (the "Project"). This is an adjustment to a pipeline that was previously approved by the Ohio Power Siting Board ("OPSB") in Case No. 24-0667-GA-GLN, with adjustments to the Project approved in Case No. 25-0345-GA-BNR and Case No. 25-0606-GA-BNR, and as is currently being requested to be adjusted in Case No. 25-0774-GA-BNR.

Figure 1: Adjustment to West-Central NCHP Pipeline Project Route



As required by Adm.Code 4906-6-05, please be advised of the following:

(B) General Information

(1) The name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a letter of notification.

Columbia is proposing to construct a natural gas pipeline identified as the Adjustment to West-Central NCHP Pipeline Project (the "Project") in Upper Arlington, Ohio. The proposed Project will be approximately 5,300 feet (approximately 1.0 mile) in length of 20-inch diameter high pressure gas transmission class pipeline, in addition to the previously approved West-Central NCHP Pipeline Project that is installing 12,247 feet of 20-inch diameter steel pipeline. The Project will allow Columbia to continue reliably serving the central Ohio region, improve safety, and further Columbia's efforts to meet mandates of the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") recently effective rule changes in 49 C.F.R. 191 and 192, commonly referred to as the "PHMSA Mega Rule."

The entirety of the 20-inch natural gas main covered within this application will be constructed within the public road right-of-way within the City of Upper Arlington. The Project Route, currently shown to be the red dashed line, may extend to the area(s) within the Limits of Disturbance (LOD) identified in Attachment B and in conformance with any/all permitting restrictions imposed by the City of Upper Arlington (or relevant municipality). Columbia plans to utilize the open cut installation method to construct the Project. If any new information is discovered, or for commercially reasonable reasons, Columbia may utilize the conventional boring, horizontal directional drilling, and open cut installation methods interchangeably during construction of the Project.

This Project meets the requirements of the Letter of Notification as it is a replacement of gas pipelines or pipeline segments greater than one mile in length but not greater than five miles in length. See Appendix B of Adm.Code 4906-1-01.

(2) If the proposed letter of notification project is a gas pipeline, a statement explaining the need for the proposed facility.

PHMSA has recently begun implementing a comprehensive, three-part rule, aimed at increasing pipeline safety. These regulations are commonly known as the PHMSA Mega Rule. The portions of the Project that are 20-inch diameter are being installed to comply with the PHMSA Mega Rule.

Mega Rule Part 1, which went into effect in 2020, involves new regulations for reconfirming the maximum allowable operating pressure (“MAOP”) of pipelines and facilities installed before July 1, 2020, that are in certain class locations or high consequence areas (“HCAs”), and do not have available certain traceable, verifiable, and complete (“TVC”) records, such as material attributes and sufficient pressure test records. Operators have until 2035 to comply with these requirements, but 50% of the work in scope must be completed by July 2028. The Project is part of Columbia’s plan to comply with the PHMSA Mega Rule.¹

Moreover, replacing the existing pipeline increases the reliability of a critical piece of Columbia’s service to the Columbus area through the NCHP system, as well as provides safety benefits. The safety benefits include, but are not limited to, a lower ratio of operating stress to yield strength of the pipeline material and updated pipeline records.

(3) The location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.

The map shown in Attachment A, Drawing Number EX-200: Overview Workspace illustrates the location of the Project in relation to existing transmission facilities in the Project area. The new pipeline is shown in red and the workspace for constructing the new pipeline is a black-dashed line. The existing NCHP pipeline that will be replaced is the blue line.

¹ 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) The alternatives considered and reasons why the proposed location or route is best suited for the proposed facility, including, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

The proposed route was developed taking into consideration the current pipeline route, private property, the density of below-grade utilities, impact to the public, and environmental features.

The proposed route is an additional 1.0 mile of pipe to be constructed at the same time as OPSB application 24-0667-GA-BLN. This was a direct result of continuous coordination with Upper Arlington for upcoming events and future construction projects within public right-of-way. The proposed route minimizes the number of residential homes and businesses directly affected by the Project. Installation methods have been selected to further limit impact to high traffic roads, other infrastructure such as railroads, environmental features, and trees. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and pipeline operation purposes along the public right-of-way. The route has 1,113 structures within 1,000 feet of the centerline, 1 of which is a school or daycare, and 1 of which is a place of worship. Please see Attachment F for the Cultural Memorandum for the details of the cultural study.

(5) Describe the public information program to inform affected property owners and residents of the nature of the project and the proposed timeframe for project construction and restoration activities.

Columbia will provide the notices required by the OPSB rules, including notices to landowners, newspaper notice, a copy of this Letter of Notification (with attachments) posted in libraries, and notices to public officials. Columbia will also be hosting a website dedicated to this phase of its Mega Rule compliance. That website is www.columbiagasohio.com/west-central-nchp. Additionally, Columbia has communicated with the City of Upper Arlington regarding communications with residents surrounding the Project. Columbia is planning to host a community meeting on September 10, 2025, at 4:30pm at the City of Upper Arlington Public Library. Columbia will also have a dedicated e-mail address to receive inquiries from any interested stakeholder and will be responding to those inquiries.

(6) The anticipated construction schedule and proposed in-service date of project.

At the present time, Columbia anticipates installation of the proposed pipeline to begin near and around Upper Arlington in the late winter/early spring of 2026 and to complete this work by December 31, 2026. These timeframes and scope of work are subject to change based on evolving project planning and other variables, and Columbia will work with Upper Arlington, and affected residents throughout the construction process.

(7) An area map of not less than 1:24,000 scale clearly depicting the facility and proposed limits of disturbance with clearly marked streets, roads, and highways, and an aerial image.

Attachment B is comprised of the pipeline alignment drawings and the pipeline workspace drawings that contain area maps at a 1"= 40' scale. The maps and drawing depict the Project centerline, workspaces, and major street crossings. The Project centerline is shown as a dashed red line, and workspaces are shown as cyan-hatched areas bounded by dashed green lines for workspace within public right-of-way; Roads, streets, highways, and other crossings are clearly labeled throughout. No additional workspace is planned at this time.

Attachment G contains the Management of Traffic (MOT) plans for the construction of the pipeline.

(8) A list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

A list of all adjacent and impacted parcels and entities are listed within a 2,000' buffer in Attachment D.

(9) Technical features of the project.

(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

The Project will be tested such that it will have Design Pressure of 720 pounds per square inch gauge ("psig") and will operate at an MAOP of 190 psig. Columbia will be installing 20-inch main-line piping that is coated steel with a wall thickness of 0.375 inches.

The location of the workspaces within public right-of-way are shown in the drawings included in Attachment B. No additional workspace within private property is anticipated at this time.

(b) For electric power transmission lines that are within 100 feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line, describe:

(i) Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way for: (a) Normal maximum loading, (b) Emergency line loading, (c) Winter normal conductor rating.

(ii) The applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

Not applicable to this Project as it does not relate to an electric power transmission line.

(c) The estimated capital cost of the project.

The estimated total cost of the proposed Project is \$ [REDACTED].

(10) Social and Ecological Impacts of the Project.

(a) A brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

The Project is located within the City of Upper Arlington, Franklin County, Ohio. The current land use along the route is comprised of residential and commercial

properties. There are also transportation-related land use areas including several road crossings.

Currently, the route has 1,113 structures within 1,000 feet of the centerline. One school/daycare, and one place of worship were identified based on desktop analysis.

There are no new planned residential developments within the Project study corridor that were discovered as part of the survey. The Project is not expected to significantly impact existing or planned land use within the vicinity of the Project. There are no federal lands that will be crossed by the Project.

The municipalities, townships, and counties affected include Franklin County and the City of Upper Arlington.

(b) The acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

No Agricultural District Land parcels are impacted by the Project.

(c) A description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Columbia conducted a Phase I intensive level cultural resource survey for the new construction of approximately 1.0 mile (1.6 kilometers [km]) of 20-inch below ground high pressure natural gas pipeline for the Project. The purpose of the intensive cultural resource survey was to identify archaeological resources and/or historic structures that might be affected by the Project.

The investigation was performed for compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108). The Ohio State Historic Preservation Office (SHPO) is the official agency of the State of Ohio which was designated the Ohio History Connection (OHC) in 1967. This report conforms to the Ohio History Connection's Archaeology Guidelines (2022) and Guidelines for Conducting History/Architecture Surveys in Ohio (2014), the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716) and Ohio Revised Code Section 149.53, and Archaeological

and Historic Survey and Salvage Work (2015). Columbia personnel who conducted the research and fieldwork meet or exceed the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716).

Prior to fieldwork, a background literature and records review was conducted. Then an intensive survey consisting of pedestrian survey with shovel testing and photographic documentation was performed.

The Area of Potential Effects (APE) is the geographic area within which the project may directly or indirectly alter the character or use of historic properties, including archaeological sites, above-ground historic resources, and properties listed or eligible for listing in the National Register of Historic Places (NRHP) ([per 36 CFR 800.4(d)(1)]). The Area of Potential Effects (Project APE) includes all areas directly and indirectly affected by the Project with the limit of ground disturbance. For the archaeological and architectural survey this includes all potential areas subject to ground disturbing activities (direct APE), and for the architectural survey this includes all potential historic structures within a 0.5-mile (0.8-km) radius of any ground disturbing activities.

As proposed, the direct APE consists of a combined total area of 6.9 acres (2.8 hectares). The background literature and records review completed by Columbia found that no archaeological or historic architectural resources were located within or immediately adjacent to the direct APE. 28 archaeological sites and 11 above-ground historic resources were determined to be located within 0.5 mile (0.8 km) of the direct APE. The survey documented a heavily disturbed setting dominated by urban construction fill. Based on the results of the survey and the extent of the Project activities, no intact, significant cultural resources will be affected by construction within the Project APE. Furthermore, no shovel testing has been requested.

A copy of the Cultural Report, including the follow up Phase I cultural resources investigation, and correspondence with SHPO is included in Attachment F.

(d) A list of the local, state, and federal government agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

A copy of this Letter of Notification has been sent to the following public officials concurrently with its submittal to the Ohio Power Siting Board.

City of Upper Arlington	
Ukeme Awakessien Jeter	Heidi Munc
City of Upper Arlington Council President / Mayor	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Brian C. Close	John J Kulewicz
City of Upper Arlington Council Vice President	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Kathy Adams	Jim Lynch
City of Upper Arlington Council	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Todd Walter	Krystal Gonchar
City of Upper Arlington Council	City of Upper Arlington City Clerk
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Lisa Keller	Steven Schoeny
City of Upper Arlington Clerk of Courts	City of Upper Arlington City Manager
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5060	614-583-5040

City of Upper Arlington (cont)	
Chad Gibson	Aaron Scott
City of Upper Arlington Community Development	City of Upper Arlington Engineering Division
3600 Tremont Rd	4100 Roberts Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5074	614-583-5351

Franklin County	
John O'Grady	Kevin L. Boyce
Franklin County Commissioner	Franklin County Commissioner
President	373 S. High Street
373 S. High Street	Columbus, Ohio 43215
Columbus, Ohio 43215	
Erica C. Crawley	Kenneth N. Wilson
Franklin County Commissioner	Franklin County Administrator
373 S. High Street	373 S. High Street
Columbus, Ohio 43215	Columbus, Ohio 43215
Jennifer Fish	Adam W. Fowler, P.E., P.S.
Franklin County Soil and Water	Franklin County Engineer
1404 Goodale Boulevard, Suite 100	970 Dublin Road
Columbus, Ohio 43212	Columbus, Ohio 43215

In addition to submitting this Letter of Notification to the Ohio Power Siting Board, the Project is subject to the following federal, state, and local agency reviews and authorizations to be received prior to construction beginning:

- U.S. Fish & Wildlife Service (USFWS) Ohio Ecological Field Office Section 7 Threatened and Endangered Species Consultation;
- Ohio State Historic Preservation Office Section 106 Historic Resources Consultation;
- Ohio Department of Natural Resources (ODNR) State Threatened and Endangered Species Consultation;
- Ohio Environmental Protection Agency (OEPA) Section 402 National Pollutant Discharge Elimination System (NPDES) and Construction Stormwater Permit and Stormwater Pollution Prevention Plan (SWPPP) requirements;
- City of Upper Arlington ROW Permit;
- Ohio EPA Hydrostatic Test Water Discharge Permit;

(e) A description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

An Information for Planning and Consultation (IPaC) Official Species List was completed on May 26, 2023, on the USFWS website (<https://ipac.ecosphere.fws.gov/>). The USFWS Official Species Listed yielded five federally listed species, which include the Indiana bat (endangered), northern long-eared bat (endangered), and rayed bean (endangered), the tri-colored bat (proposed endangered), and the monarch butterfly (candidate). For the full Threatened and Endangered species memorandum, please see Attachment E.

A project review request letter was submitted to ODNR on May 26, 2023, seeking review of the potential impacts of the Project on federal and state listed species and their habitats within Franklin County., which identifies thirty-eight State-listed species that occur within one mile of the Project limits: Indiana bat (endangered), black bear (*Ursus americanus*; endangered), northern long-eared bat (threatened), upland sandpiper (*Bartramia longicauda*; endangered), American bittern (*Botaurus lentiginosus*; endangered), cattle egret (*Bubulcus ibis*; endangered), lark sparrow (*Chondestes grammacus*; endangered), northern harrier (*Circus hudsonius*; endangered), sandhill crane (*Grus canadensis*; threatened), least bittern (*Ixobrychus exilis*; threatened), black-crowned night-heron (*Nycticorax nycticorax*; threatened), barn owl (*Tyto alba*; threatened), caddisfly (*Chimarra socia*; endangered), Iowa darter (*Etheostoma exile*; endangered), spotted darter (*Etheostoma maculatum*; endangered), tonguetied minnow (*Exoglossum laurae*; endangered), goldeye (*Hiodon alosoides*; endangered), northern brook lamprey (*Ichthyomyzon fossor*; endangered), shortnose gar (*Lepisosteus platostomus*; endangered), popeye shiner (*Notropis ariommus*; endangered), lake chubsucker (*Erimyzon sucetta*; threatened), tippecanoe darter (*Etheostoma tippecanoe*; threatened), paddlefish (*Polyodon spathula*; threatened), butterfly (*Ellipsaria lineolata*; endangered), elephant-ear (*Elliptio crassidens*; endangered), purple cat's paw (*Epioblasma obliquata*; endangered), snuffbox (*Epioblasma triquetra*; endangered), longsolid (*Fusconaia subrotunda*; endangered), pink mucket (*Lampsilis abrupta*; endangered), pocketbook (*Lampsilis ovata*; endangered) washboard (*Megaloniais nervosa*; endangered), clubshell (*Pleurobema clava*; endangered), Ohio pigtoe

(*Pleurobema cordatum*; endangered), rabbitsfoot (*Theliderma cylindrica*; endangered), rayed bean (*Villosa fabalis*; endangered), black sandshell (*Ligumia recta*; threatened), threehorn wartyback (*Obliquaria reflexa*; threatened), fawnsfoot (*Truncilla donaciformis*; threatened), pondhorn (*Uniomerus tetralasmus*; threatened), smooth greensnake (*Opheodrys vernalis*; endangered), Gattinger's foxglove (*Agalinis gattingeri*; threatened), spreading rock cress (*Arabis patens*; endangered) and pale umbrella-sedge (*Cyperus acuminatus*, endangered). Note: these species are not specifically recorded within the Project area itself.

Due to the Project type, size, location, and proposed implementation of seasonal tree cutting exclusively within road right-of-way to avoid impacts to the federally listed bat species, Columbia anticipates that the Project, as proposed, is not likely to adversely affect the Indiana bat or northern long-eared bat.

The habitat within the Project corridor is urban and primarily consists of residential and commercial areas with maintained lawn. There is no forested habitat within the Project area. During the wetland delineation study, an on-site habitat assessment was performed to identify potential habitat for federally and state protected species within the Project area. No forested habitat was found within the Project corridor.

The Project was also assessed for the presence of habitats that could potentially support other listed species. No suitable habitat for the listed species was identified within the Project area. No streams or wetlands have been delineated within the Project area that will be crossed by the proposed pipeline.

Section 7(a)(2) of the Endangered Species Act (ESA) directs all Federal agencies to ensure that any action they authorize, fund, or carry-out does not jeopardize the continued existence of an endangered or threatened species or designated or proposed critical habitat (collectively, referred to as protected resources). No jurisdictional streams are crossed by the proposed pipeline and therefore a USACE Nationwide Permit 12 (reporting or non-reporting) is not required.

(f) A description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

An environmental review of the Project area was conducted by Columbia. According to the USFWS, there are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area. No streams were identified in the Project area. For the full Wetland Delineation Report, please see Attachment C. No horizontal directional drills (HDD)s are planned for this project. If a change of construction methods requires an HDD, an Inadvertent Release Plans will be provided. An excerpt of Attachment C is below:

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) were reviewed to identify any flood hazard areas that have been mapped for the proposed pipeline route. Specifically, map numbers 39049C0164K, and 39049C0168K encompass the area of the Project and were reviewed. The FEMA FIRM identified a regulated floodplain west of the Project, associated with the Scioto River and a regulated floodplain east of the Project, associated with the Olentangy River. The Project does not cross any mapped floodplain areas. A copy of the aerial map with FEMA floodplain and floodway information for the Project area is included as Figure 4 in the Wetland Delineation Report located in Attachment C.

The Project Study Area is comprised of a 100-foot-wide survey corridor centered on the proposed pipeline alignment for 1.0 miles. The Project Study Area or “Survey Corridor” includes the proposed installation of 1.0 miles of 20-inch pipeline. The Survey Corridor was investigated to identify potential jurisdictional Waters of the U.S. (WOTUS) and wetlands subject to Federal or State regulatory jurisdiction. The delineation methodologies developed by the USACE and the USEPA, as described in the 1987 Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1 and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) and the subsequently issued USACE regulatory guidance regarding the identification of jurisdictional stream channels through the recognition of field indicators of an ordinary high-water mark within drainage features (Environmental Laboratory, 1987; USACE 2012; USACE 2005) were utilized during our investigation. The location and size of jurisdictional areas delineated are shown on Figure 5, Delineation Results, in the Wetland Delineation Report located in Attachment C.

Based on the field investigations, no stream or wetland features were delineated within the Survey Corridor by Columbia on March 2 and 3, 2022 and May 19, 2023.

Impacts to vegetation along the proposed pipeline route will be minimal. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and

pipeline operation purposes along the public right-of-way Maintained lawn habitat that will be impacted by the proposed Project includes common upland species such as white clover (*Trifolium repense*), tall fescue (*Schedonorus arundinaceus*), yellow sweet clover (*Melotius officinalis*), and dandelion (*Taraxacum officinale*).

(g) Any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of Columbia's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

Should staff of the Ohio Power Siting Board desire further information or discussion of this application, please do not hesitate to reach out to me at the information listed above.

Respectfully submitted,

/s/ Melissa L. Thompson