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July 2, 2026

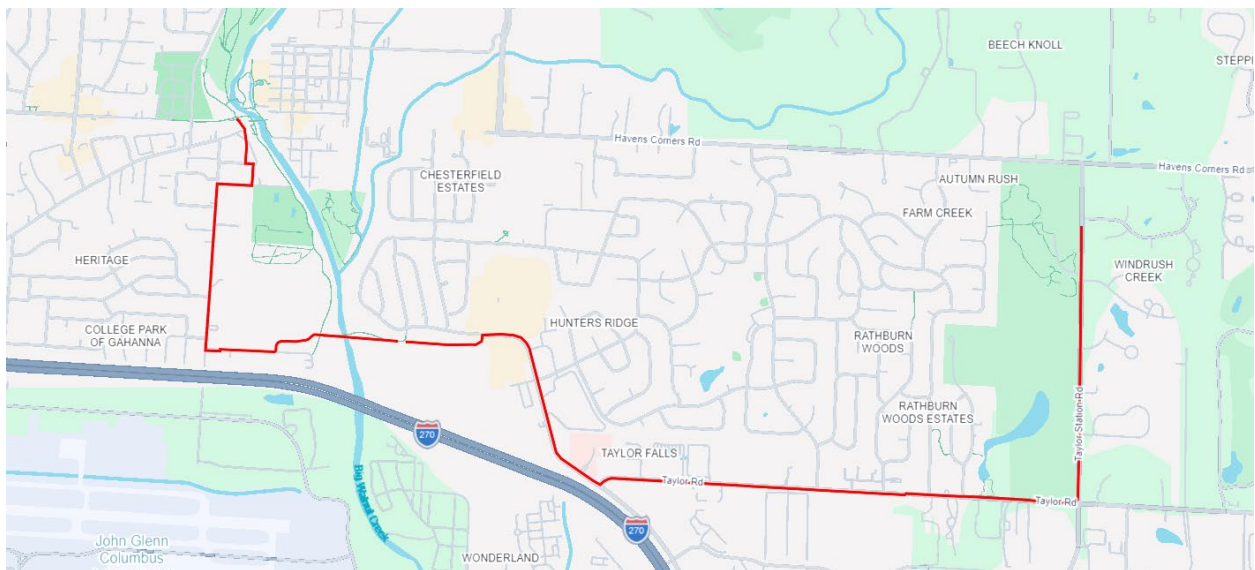
Ms. Tanowa Troupe
Secretary, Office of Administration
Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

RE: *In the Matter of the Letter of Notification Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the Gahanna NCHP Pipeline Project*
OPSB Case No. 26-0713-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 Gahanna NCHP Pipeline Project (the "Project").

Figure 1: Gahanna 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 Gahanna NCHP Pipeline Project (the "Project") in Gahanna, Ohio, Jefferson Township, Franklin County, Ohio. The proposed Project will be approximately 23,987 feet (approximately 4.54 miles) in length of 24-inch diameter high pressure gas transmission class 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") rule changes in 49 C.F.R. 191 and 192, commonly referred to as the "PHMSA Mega Rule."

The entirety of the 24-inch natural gas main covered within this application will be constructed within the public road right-of-way and private easements within the City of Gahanna and Jefferson Township. The Project Route, currently shown to be the red line in Figure 1 and in **Attachment B**, 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 Gahanna (or relevant municipality). Columbia plans to utilize open cut, conventional boring, and horizontal directional drilling installation methods to construct the Project. If any new information is discovered, or for commercially reasonable reasons, Columbia may utilize 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 implemented a comprehensive, three-part rule, aimed at increasing pipeline safety. These regulations are commonly known as the PHMSA Mega Rule.

PHMSA 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 maps shown in **Attachment A and Attachment B** illustrate 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 in cyan shading. The Project Route, currently shown to be the red line, may be shifted within the LOD identified in **Attachment B** and in conformance with any/all permitting restrictions imposed by the City of Gahanna (or relevant municipality) 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 the 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 4.54 miles of pipe to be constructed in 2027. Columbia has coordinated with the City of Gahanna to account for upcoming events and future construction projects within public right-of-way that may be impacted by or intersect with the Project. 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 604 structures within 1,000 feet of the centerline, four of which are schools or daycares, and three of which are places of worship. Please see **Attachment G** for the Cultural Memorandum for the details of the cultural study.²

(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 will be www.columbiagasohio.com/gahanna-nchp. Additionally, Columbia has communicated with the City of Gahanna regarding communications with residents surrounding the Project. Columbia is planning to host an informational meeting

² The map included in **Attachment G**, which was provided by State Historic Preservation Office (“SHPO”), identifies a workspace route that was previously considered by Columbia prior to finalization. On June 10, 2026, the Company provided SHPO with the final as-proposed workspace route that aligns with the route proposed in this Application. SHPO responded in a June 26, 2026 letter (also included in **Attachment G**) with its analysis for Columbia’s final route. SHPO did not provide an updated map with that June 26, 2026 letter.

approximately 30 days in advance of construction beginning and plans to offer monthly office hours throughout construction. 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 around January 2027, with an anticipated in-service date on or about December 31, 2027. Columbia will work with Gahanna, and affected residents throughout the construction and restoration 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, limits of disturbance, and major street crossings. The limits of disturbance include the workspace shown on the drawings through private easements and extends to the entire right-of-way where applicable. The Project centerline is shown as a dashed red line, and workspaces are shown as cyan shading areas bounded by dashed black lines for workspace within public right-of-way; grey-hatched areas bounded by dashed blue lines for permanent easement within private parcels; and pink-hatched areas bounded by dashed black lines for temporary easement within private parcels. Roads, streets, highways, and other crossings are clearly labeled throughout.

The Project Route, currently shown to be the red line in Figure 1 and in **Attachment B**, may extend to the area(s) within the LOD identified in **Attachment B** and in conformance with any/all permitting restrictions imposed by the City of Gahanna (or relevant municipality).

Attachment H 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 impacted parcels and entities are listed in **Attachment D**.

As of the date of this filing, Columbia is still in the process of obtaining necessary easements, which are listed in **Attachment D**. Columbia may procure additional temporary easements for the purposes of temporary access and/or workspace as needed.

(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 24-inch steel pipeline replacement project, which is 0.375 inches in wall thickness, will have a design pressure of 650 psig and will have an MAOP of 190 psig. The MAOP is consistent with that of the entire NCHP system. While there are no current capacity or pressure concerns on the system, the greater Columbus area 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 650 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.

The location of the workspaces, easements, and right-of-way are shown in the drawings included in **Attachment B**, most of which are within the public right-of-way.

(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 Gahanna and Jefferson Township, 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 604 structures within 1,000 feet of the centerline, four of which are schools or daycares, and three of which are places of worship based on the 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, Jefferson Township, and the City of Gahanna.

(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 land or 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.

An intensive desktop cultural review was conducted by the State Historic Preservation Office (“SHPO”), which concluded that there are no significant or archeological or cultural resources that may be located within the Search Area, which included a one-mile buffer around the proposed project route, such that fieldwork and shovel tests were not required at this time. Additionally, Columbia submitted a Pre-Construction Notification (“PCN”) to the U.S. Army Corps of Engineers (“USACE”) in June 2026. In the event the USACE requires additional field work, Columbia will initiate fieldwork and shovel tests.

A copy of the SHPO survey area with the SHPO correspondence and data is included in **Attachment G**.

(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 Gahanna	
Laurie Jadwin	Merisa Bowers
City of Gahanna Mayor	Gahanna Council Member at Large
200 S Hamilton Rd	200 S Hamilton Rd
Gahanna, OH 43230	Gahanna, OH 43230
614-342-4045	614-342-4090
Trenton Weaver	Michael Schnetzer
Gahanna Council President	Gahanna Council Member
200 S Hamilton Rd	200 S Hamilton Rd
Gahanna, OH 43230	Gahanna, OH 43230
614-342-4090	614-342-4090
Jamille Jones	Nancy McGregor
Gahanna Council Vice President Member at Large	Gahanna Council Member at Large

200 S Hamilton Rd	200 S Hamilton Rd
Gahanna, OH 43230	Gahanna, OH 43230
614-342-4090	614-342-4090
Kaylee Padova	Stephen Renner
Gahanna Council Member	Gahanna Council Finance Chair
200 S Hamilton Rd	200 S Hamilton Rd
Gahanna, OH 43230	Gahanna, OH 43230
614-342-4090	614-342-4090
Jeremy VanMeter	Sophia McGuire
Gahanna Clerk of Council	City of Gahanna Deputy Clerk of Council
200 S Hamilton Rd	200 S Hamilton Rd
Gahanna, OH 43230	Gahanna, OH 43230
614-342-4090	614-342-4090

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

Jefferson Township	
Rich Courter	Susan Lewis Kaylor

Board of Trustees Chair	Board of Trustees
6545 Havens Rd	6545 Havens Rd
Blacklick, OH 43004	Blacklick, OH 43004
Mike Rowan	Ken Jones
Board of Trustees Vice-Chair	Fiscal Official
6545 Havens Rd	6545 Havens Rd
Blacklick, OH 43004	Blacklick, OH 43004

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;
- Army Corps of Engineers (“USACE”) Permit;
- City of Gahanna right-of-way (“ROW”) Permit;
- Franklin County Engineer’s ROW Permit; and
- OEPA 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 June 1st, 2026, 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), 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**.³

Due to the Project type, size, location, and proposed implementation of seasonal tree cutting which will take place within the allowed window between October 1st and March 31st 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.

A project review request letter was submitted to ODNR on June 5, 2026, seeking to update the April 14, 2025 review of the potential impacts of the Project on federal and state listed species and their habitats within Franklin County, which identifies 26 state listed plant species: Cypress-knee Sedge (*Carex decomposita*) endangered, Muskellunge (*Esox masquinongy*) state species of concern, Tippecanoe Darter (*Etheostoma tippecanoe*) state species of concern, Smooth Greensnake (*Opheodrys vernalis*) endangered, Elktoe (*Alasmidonta marginata*) state species of concern, Wavy-rayed Lampmussel (*Lampsilis fasciola*) state species of concern, Round Hickorynut (*Obovaria subrotunda*) state endangered, federally threatened, Kidneyshell (*Ptychobranthus fasciolaris*) state species of concern, Rainbow (*Villosa iris*) state species of concern, elephant-ear (*Elliptio crassidens crassidens*) state endangered, pocketbook (*Lampsilis ovata*) state endangered, long solid (*Fusconaia subrotunda*) state endangered, washboard (*Megaloniais nervosa*) state endangered, Ohio pigtoe (*Pleurobema cordatum*) state endangered, pondhorn (*Uniomerus tetralasmus*) state threatened, Salamander Mussel (*Simpsonia ambigua*) state threatened, goldeye (*Hiodon alosoides*) state endangered, shortnose gar (*Lepisosteus platostomus*) state endangered, Iowa darter (*Etheostoma exile*) state endangered, spotted darter (*Etheostoma maculatum*) state endangered, northern brook lamprey (*Ichthyomyzon fossor*) state endangered, tonguetied minnow (*Exoglossum laurae*) state endangered, popeye shiner (*Notropis ariommus*) state endangered, lake chubsucker (*Erimyzon sucetta*) state threatened, paddlefish (*Polyodon spathula*) state threatened, and sandhill crane (*Antigone canadensis*) state threatened. On June 29, 2029, Columbia received a response from ODNR indicating that the proposed project route is not expected to impact any of the aforementioned species.

³ While the letter from ODNR reflects an April 14, 2025 date, it was issued and received by the Company on June 29, 2026.

The habitat within the Project LOD is urban and primarily consists of residential and commercial areas with maintained lawn areas. There is forested habitat within the Project LOD. 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.

The Project was also assessed for the presence of habitats that could potentially support other listed species. Suitable summer habitat for the listed species was identified within the Project area. Streams and wetlands have been delineated within the Project area. One wetland will be crossed and three streams will be crossed by the 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. Streams identified in the Project area are not part of a National or State wild and scenic river. For the full Wetland Delineation Report, please see **Attachment C**, and see the Inadvertent Release Plans for the horizontal directional drills ("HDDs") in **Attachment F**. As further described in **Attachment C**, 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 39049C0194K, and 39049C0213K encompass the area of the Project and were reviewed. The FEMA FIRM identified a regulated floodplain within the Project, associated with the Big Walnut Creek. The Project does cross one mapped floodplain area.

A copy of the aerial map with FEMA floodplain and floodway information for the Project area is included 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 4.54 miles. The Project Study Area or “Survey Corridor” includes the proposed installation of 4.54 miles of 24-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 the investigation. The location and size of jurisdictional areas delineated are shown on Figure 2, Delineation Results, in the Wetland Delineation Report located in Attachment C.

Nine (9) wetland features, three Palustrine Emergent (“PEM”), three Palustrine Forested (PFO), and one Palustrine scrub-shrub (“PSS”) wetlands, two (2) perennial (PER) watercourse, seven (7) intermittent (“INT”), and one (1) ephemeral (“EPH”) watercourse were identified and delineated within the Study Area Survey Corridor by Keramida on February 11th and 26th, 2025 and March 25th, 2026. A total of 4.64 acres of palustrine forested (“PFO”) wetland, 1.42 acres of palustrine emergent (“PEM”) wetland, 0.22 acres of Palustrine scrub-shrub (“PSS”).

Field investigations were conducted in accordance with the USACE Wetland Delineation Manual, Technical Report Y-87-1 (Environmental Laboratory, 1987) using wetland criteria detailed in the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) (USACE, 2012). If a wetland was delineated, a USACE Regional Supplement Wetland Determination Data Form and an Ohio Rapid Assessment Method for Wetlands (“ORAM”) were completed at each selected data point. Wetland determination data forms are comprised of the vegetation community, soil profile characteristics, and hydrology were recorded on the data form. The ORAM bases wetland quality and functionality through numerous metrics to categorize the wetland itself to determine the wetland’s

overall classification. The three wetland categories are Category 1, Category 2, and Category 3 which correlate to wetlands of low, medium, and high quality, respectively. Wetlands were classified following Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al., 1979). The boundaries of each wetland were recorded with a high-precision, mapping-grade Global Positioning System (GPS) unit and photographs were taken of each resource

To identify and delineate watercourses, Keramida performed an onsite evaluation and data collection based on the OEPA Headwater Habitat Evaluation Index (“HHEI”) or Qualitative Habitat Evaluation Index (“QHEI”) for streams. Both methodologies are designed to determine stream habitat quality, respectively. If a watercourse was delineated, information was collected on the determination of size of watershed drainage area for that watercourse. The HHEI is used for streams with less than or equal to one square mile of drainage area. The QHEI is used for streams with greater than one square mile of drainage area. The extent of each watercourse was recorded with a GPS unit and photographs were taken of each resource.

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/ Michael J. Schuler

Michael J. Schuler (Counsel of Record)

Michael J. Schuler, Assistant Gen. Counsel
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