

Columbia Gas of Pennsylvania, Inc. 2021-2022 Winter Reliability Overview

1. Winter Readiness

Provide a summary of your company's winter preventative maintenance program(s) which directly facilitate safe and reliable service over the heating season. Provide a description of any potential best practices including any new leak detection programs.

Frost Patrols

Leak surveys based on frost potential will continue on our remaining and declining population of cast iron pipe until this pipe is entirely replaced. These patrols typically begin in late December and continue weekly until the end of March.

Winter Operations Preparedness

Columbia's 2021-2022 Winter Operations Plan includes an assessment of all distribution facilities to ensure that adequate capacity and pressures are available to serve projected peak day demand. Considered in the assessment are facility performance under last year's peak demand, system improvements, upgrades and reconfigurations over the past year, along with changes in customer demand. This assessment determines the appropriate monitoring activities to be performed throughout the winter season.

Winter Operations Monitoring

Winter Operations Monitoring involves the recording of distribution system pressures at particular intervals of winter ambient temperatures. Collecting and compiling winter operations information enables Operations & Gas Control, Engineering, and Measurement & Regulation personnel to proactively address operational issues and provides a platform for system planning and modeling.

Emergency Dispatch

Columbia operates a fully-automated call-out process for emergency response with Service personnel on an Emergency Response Rotation. This means that Columbia's emergency response personnel are available on rotation 24 hours a day, 7 days a week, and 365 days a year to respond to emergencies on its distribution system.

2. Employee Safety/Readiness

Provide a description of any procedures and/or training protocols your company uses to ensure personnel are adequately prepared and staffed for the heating season. Also, Provide a summary of your organization's participation in emergency preparedness exercises over the past 12 months, whether internal or with external stakeholders. Describe the general scenarios simulated.

Employee Safety

Columbia Gas continues to be committed to maintaining a strong culture of safety for employees, customers and the communities in which we work.

We have continued to develop, maintain and update our COVID-19 programs and protective protocols to navigate the pandemic during the past year. Our written COVID-19 safety plan, the "NiSource Work Together. Be Safe. Stay Healthy. An Interactive Guide to Navigating our COVID-19 Response," provides guidance to keep our employees and facilities as safe as possible. This guide also includes our latest COVID-19 guidance which is updated periodically according to current CDC guidance and NiSource protocols. Our COVID-19 Incident and Area Command Teams continue to meet to manage and facilitate our ongoing pandemic response and safety efforts to minimize COVID-19 risks to our employees, contractors and customers. Our COVID-19 updates and changes are communicated through COVID-19 leadership and employee Town Hall calls on frequent basis. In 2021, each role at Columbia Gas has been mapped to one of four different "Ways of Working": Mobile (less than one day per week in the office); Remote (0.5 – 2 days per week in the office); Flex (3 – 4.5 days per week in the office); Onsite (4.5 – 5 days per week in the office). Many of our employees continue to work from home during the pandemic and our Flex and Remote employee work roles are not expected to return to work at our facilities before February of 2022.

Each week, the Columbia Gas of PA Safety Team distributes our weekly safety summary communication that includes a review of any safety related events that have occurred, a damage prevention message and a safety tailgate discussion item. The safety tailgate material is directed towards seasonal hazards and risks that our employees face in the field. Each week, our Leaders gather their teams of frontline workers to review this information to enhance our collective levels of safety awareness and to mitigate specific risks including seasonal hazards. Winter safety communications are initiated in late autumn to help us prepare our facilities and personnel for working and driving in winter weather. We will then prepare for winter weather including preparedness for snow and ice removal and management at both at our facilities and working in the field. The Columbia Gas of PA local safety teams will also discuss winter safety and assist in preparing their operating areas for the cold weather and associated hazards. Our employees are also equipped with cold weather clothing and Personal Protective Equipment to perform their work as safely as possible when facing winter work hazards.

A winter readiness vehicle checklist is also communicated to employees. Lastly, work site safety observations are conducted by Leadership and safety personnel and will continue during the winter season.

In 2021, Columbia Gas of Pennsylvania started utilizing the communication social network Microsoft Yammer to communicate information including seasonal safety awareness and winter preparedness information and COVID-19 updates to our employees through their electronic devices.

Columbia completed a simulation exercise on September 22, 2021 to practice for emergency situations ahead of the winter season. Table Top exercises will be conducted in the fall of 2021 in each operating location. A virtual table top to test the new Incident Command Structure (ICS) was conducted on June 17, 2021.

Staffing

Columbia's Operations Planning team, in conjunction with local operating center leadership, evaluate projected workloads by activity and develop an annual staffing plan to ensure preparedness. These plans are used to coordinate the hiring and training of new employees throughout the year. The plans also identify shift placement to best match workload demands and enhance response to emergency situations.

Personnel Preparedness

In addition to ongoing training and qualification programs, the development of the Winter Operations Plan provides an opportunity for Field Operations personnel to better understand how their systems operate. This process includes a review of system performance during the previous year's heating season, changes made to the system, and key monitoring points. Collecting and compiling winter operations information enables Operations & Gas Control, Engineering and Measurement & Regulation personnel to proactively address operational issues and provides a platform for system planning and modeling.

3. Communications Outreach

Provide a summary of the communications procedures your company has in place to effectively manage potential crisis events during the heating season. Include a description of outreach activities and any exercises done with local and regional emergency management organizations to coordinate emergency response procedures.

Columbia's Customer Care Center has up-to-date information to respond to customer inquiries in the event of any emergency or outage. As service interruptions can vary in nature and range – and therefore require different levels of customer outreach – Columbia will take the following additional steps to communicate with impacted customers, as

appropriate:

a. Web Page Customer Alert – “Customer Alert” posted on Columbia’s web site. This includes an alert bar on the home page with a link to an “Outage/Incident Center” page, with regularly posted updates when new information is received.

b. Local Public Official Notification – Notify appropriate local public officials (i.e. legislators, town managers, public/safety works directors, emergency response officials, etc.) as well as the Commission to ensure that all critical external stakeholders are identified and the response is coordinated.

c. News Release – As appropriate, issue a targeted news release with incident details. For example, an outage release would include the location of outage, number of customers impacted, estimated date and time for service restoration, and the location of potential warming centers. Any news release will be followed by targeted outreach and updates to local media contacts, with an awareness of news cycle times, in an attempt to provide the most up-to-date information through public dissemination of information.

d. On-camera Interviews or Targeted Media Outreach – As appropriate, participate in live or filmed news clips and provide targeted outreach and updates to local media contacts, with an awareness of news cycle times, in an attempt to provide the most up-to-date information through public dissemination of information.

e. Social Media – Post regular, time-sensitive outage/emergency updates on Columbia’s Twitter, Facebook, and Nextdoor pages to provide regular updates to customers, communicate the location(s) of warming center(s), and educate affected customers on the process for restoration of service.

f. Customer Emails – When appropriate, send zip-code targeted emails to customers with outage/emergency information, the location of warming center(s), and instructions for the restoration of service.

g. Text Messaging – When appropriate, send text messages to targeted customers, with outage/emergency information, including the location of warming centers(s) and instructions for the restoration of service.

h. Warming Center Coordination – If needed, partner with local Volunteer Fire Departments, Emergency Management organizations, and Red Cross chapters to establish a warming center for impacted customers while their service is interrupted. If shelters are open, utilize news media, Columbia’s web site, social media channels, and the customer email system to disseminate information (location, hours, and resources available).

i. Reverse 911 or Other Applicable Phone Lists – Where applicable, work with

emergency management agencies about using county Reverse 911 system, emergency alert, or school district notification systems to communicate with the community during outages and restoration efforts.

4. Gas Supply and Planning

Describe the methods and protocols your company uses to ensure reliable gas delivery at least cost during the heating season. Include how your company plans to manage peak demand days, capacity planning, interstate supply coordination, storage, curtailment, and weather forecasting. Provide a description of any best practices, including communications and coordination with natural gas suppliers and interruptible service customers on your system ahead of anticipated peak usage.

To ensure that it can meet its firm service obligations, Columbia has longstanding daily and winter season “Design Criteria” which serve as the basis for the design and management of its supply/capacity portfolio. Columbia’s Design Day Temperature has a 6.67% probability of occurrence and Columbia’s Design Winter Season is based on colder temperatures having a 10% probability. More specifically, there is a 1 in 15 chance that actual temperatures could exceed Columbia’s Design Day Temperature of -5 degrees, and a 1 in 10 chance that the weather could exceed Columbia’s Design Winter Season criteria. These criteria serve as the basis for the design of Columbia’s supply and capacity portfolio and Columbia’s management of its assets to ensure its ability to reliably fulfill its firm service obligations.

Columbia is well positioned to meet its firm service obligations for the 2021-2022 Winter Season. Columbia secures its winter supplies primarily in two ways. First, Columbia contracts for firm supplies equal to its expected purchase needs for the three coldest months of December through February, prior to the start of the winter season. Secondly, Columbia fills its firm pipeline storage services to a level of approximately 95 percent by November 1st. Further, Columbia manages its assets daily in a manner that ensures reliable service in the short term through the use of a 5-day weather forecast from a commercial weather service. In the longer term, Columbia protects its firm seasonal service obligations based on managing its assets to meet the “Design Criteria” throughout the winter period. For the 2021-2022 Winter Season, assuming normal weather, Columbia expects to service Firm Sales Markets with approximately a 25/75 split between Firm Purchases and Storage Withdrawals. On a Design Day, at an average daily temperature of -5 degrees, Storage Withdrawals will make up an even greater portion of Columbia’s service to Firm Sales Markets, approaching 80%. Columbia would not expect curtailment of any firm requirements.

5. Natural Gas Demand from Electric Generators

Provide your company's view on any potential concerns about fuel availability over the winter heating season given the increased demand for natural gas as an electric generation fuel source and possible increased use of firm gas transportation service. Include any new protocols or plans your company may have in place to manage this new dynamic.

In recognition of the planning criteria and processes described in the Gas Supply and Planning section above, Columbia is confident about the adequacy of supply and the availability of firm transportation service to meet its firm service obligations for the upcoming winter. As has been noted, Columbia's supply/capacity portfolio and associated management throughout the winter season are predicated on the occurrence of extreme cold daily and seasonal temperatures having rather limited probabilities of occurrence, with the foremost objective being the maintenance of safe, reliable service. For these reasons, the prospect of increased demand for natural gas or increased use of firm transportation service for the purpose of electric generation present Columbia with no undue cause for concern. In fact, Columbia fully supports the concept of firm transportation service capacity being used for such purpose. Because of Columbia's longstanding policies and practices regarding supply and capacity, along with their actual management, no new plans or protocols are in need of being developed or instituted as a result of the prospective increased use of natural gas for electric generation.

6. COVID-19 Preparations

Describe your organization's preparations for wintertime operations and how it will meet its leak survey, detection, and response obligations during the ongoing COVID-19 pandemic, if this was not already covered in your answers to Questions 1 and 2.

In addition to actions identified above under the heading "Employee Safety/Readiness", Columbia continues to evaluate work plans and resource capabilities. Columbia has made adjustments to work plans and staffing throughout the pandemic to meet response obligations and will continue to do so during winter operations.