

# Columbia Gas of Pennsylvania, Inc. 2022-2023 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

Columbia currently projects that it will have retired all cast iron pipes in its system by December 31, 2022. If there are remaining cast iron facilities past that date, 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 2022-2023 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 continues its commitment to strengthening and sustaining a strong culture of safety for our employees, customers, and communities in which we work. In September of 2022, Columbia has returned employees to work under a new Ways of Working model. The new Ways of Working has defined roles for each employee's work status as on-site, hybrid and remote. As we continue to keep our employees and business partners working as safely as possible while the COVID-19 pandemic persists, we have continued to follow the latest CDC guidance including most recently the COVID-19 Community Levels which provide us with recommended prevention strategies and actions to take based on the latest CDC information.

The Columbia Gas of Pennsylvania team of safety professionals create and communicate a weekly safety summary communication. The safety tailgate topics and information are aimed to create awareness towards seasonal hazards and risks that our employees face in the field, such as slip, trip, and fall prevention, cold stress, safe driving, winter vehicle and facility preparedness, and other similar topics.

Safety messaging for employees is also distributed via the communication social network, Microsoft Yammer, to communicate pertinent information and updates to our employees through their electronic devices. Winter safety communications are initiated in late autumn to help us prepare our facilities and personnel for working and driving in cold, inclement, or winter weather. Additionally, we will execute our preparedness efforts for snow and ice removal for our Columbia facilities while also preparing our employees to work safely in the field during winter weather. Our employee led safety teams will also support these efforts and will create additional awareness to prepare our personnel to work safely during winter weather.

We also provide our employees with the proper personal protective equipment, anti-slip footwear, and clothing to perform their work safely during winter months. Employees have access to this equipment and can also collaborate with their leaders to acquire any safety items or devices that they need to work safely. A vehicle checklist for winter readiness is shared with our personnel each Autumn as we prepare for ice and snow. Columbia also

executes upon a robust safety observation program where job site safety audits are conducted throughout each month, including the winter season.

Columbia Gas continues to train and prepare our Incident Command Structure (ICS) Teams for emergency responses. Columbia hosted and performed a NiSource Gas Segment 2022 Tabletop emergency exercise on March 15, 2022 in York, PA. Most recently, a full-scale on-site exercise was conducted at a NiSource training center in Gahanna, Ohio on September 14, 2022 to train for emergency situations prior to the winter season. In this event, our Mobile Command Center was utilized, and working beside the ICS Teams in the exercise were local police, firefighters, and other responders. The goal was to enhance coordination and communication between Columbia Gas/NIPSCO incident management teams and public safety partners. Additionally, on July 27, 2022 and August 31, 2022 Columbia held full scale emergency exercises in Canonsburg, PA and Ellwood City, PA, respectively. These exercises were coordinated events involving our employees along with local fire, police, 911 centers, public officials, and customers.

### 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/Alert Center” page, with regularly posted updates when new information is received, including information on what causes outages, and an explanation and video of how Columbia Gas restores service after an outage.

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, link customers to the Alert Center page, 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 2022-2023 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 1<sup>st</sup>. 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 2022-2023 Winter Season, assuming normal weather, Columbia expects to service Firm Sales Markets with approximately a 40/60 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 75%. 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 need to be developed or instituted as a result of the prospective increased use of natural gas for electric generation.