

Theodore J. Gallagher
Assistant General Counsel
Legal Department



121 Champion Way, Suite 100
Canonsburg, PA 15317
Office: 724.416.6355
Fax: 724.416.6382
tjgallagher@nisource.com

VIA: ELECTRONIC FILING

September 20, 2017

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17105-3265

Re: Columbia Gas of Pennsylvania, Inc.
NiSource System Money Pool Agreement
Docket No. G-2017-2619362

Dear Ms. Chiavetta:

Enclosed please find Columbia Gas of Pennsylvania, Inc.'s data request responses regarding the above-captioned matter as follows:

PUC/TUS Set 1: 001 through 005

Thank you for your kind attention to this matter. Should you have any questions, please do not hesitate to contact the undersigned at 724-416-6355.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Theodore J. Gallagher".

Theodore J. Gallagher

/kak

Enclosure

Cc Marc Hoffer/TUS (Via: Electronic Mail Only) mhoffer@pa.gov

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

Marc Hoffer/ Bureau of Technical Utility Services
(Via: Email Only) mhoffer@pa.gov



Theodore J. Gallagher

Dated: September 20, 2017

VERIFICATION

I, Nicole Paloney, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 9-20-2017

Nicole Paloney
Nicole Paloney
Director of Rates and Regulatory Affairs
Columbia Gas of Pennsylvania, Inc.

Docket No. G-2017-2619362
NiSource Money Pool Agreement
Data Request

TUS -1. Please provide the average money pool balances for all the companies that participate in the NiSource Money Pool for the most current available one-year period.

Response:

The requested information is tracked on a monthly basis in the normal course of business. The attached schedule (Attachment A) provides the month end money pool borrowing and investing balances for each entity over the last thirteen months.

Month End Money Pool Balances (\$ 000s)

	<u>Aug-16</u>	<u>Sep-16</u>	<u>Oct-16</u>	<u>Nov-16</u>	<u>Dec-16</u>	<u>Jan-17</u>	<u>Feb-17</u>	<u>Mar-17</u>	<u>Apr-17</u>	<u>May-17</u>	<u>Jun-17</u>	<u>Jul-17</u>	<u>Aug-17</u>
EnergyUSA, Inc.													
Borrowing Balance	\$41,338	\$41,375	\$41,453	\$41,492	\$41,529	\$41,572	\$41,618	\$41,658	\$41,708	\$41,755	\$41,801	\$71,393	\$0
Investor Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Central Kentucky Transmission Company													
Borrowing Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Investor Balance	\$225	\$177	\$204	\$207	\$199	\$208	\$223	\$219	\$216	\$225	\$234	\$243	\$243
Lake Erie Land Company													
Borrowing Balance	\$13,078	\$13,090	\$13,192	\$13,262	\$13,358	\$13,438	\$13,621	\$13,604	\$13,675	\$13,746	\$13,791	\$13,850	\$14,424
Investor Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
NIPSCO Accounts Receivable Corporation													
Borrowing Balance	\$10,607	\$10,814	\$36,190	\$36,366	\$0	\$0	\$0	\$0	\$12,609	\$14,251	\$14,517	\$19,038	\$15,237
Investor Balance	\$0	\$0	\$0	\$0	\$13,381	\$38,128	\$37,886	\$12,655	\$0	\$0	\$0	\$0	\$0
NiSource Corporate Group, LLC													
Borrowing Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Investor Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
NiSource Capital Markets, Inc.													
Borrowing Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Investor Balance	\$9	\$10	\$10	\$10	\$8	\$8	\$24	\$41	\$28	\$28	\$29	\$29	\$29
NiSource Gas Distribution Group, Inc.													
Borrowing Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Investor Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
NiSource Energy Technologies, Inc.													
Borrowing Balance	\$20,772	\$20,771	\$20,848	\$20,868	\$20,887	\$20,909	\$20,933	\$20,966	\$20,979	\$21,003	\$21,027	\$21,038	\$21,129
Investor Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
NiSource Finance Corp.													
Borrowing Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Investor Balance	\$731,197	\$797,945	\$860,942	\$948,172	\$694,533	\$414,237	\$407,843	\$321,917	\$312,158	\$415,668	\$620,528	\$778,385	\$620,113
NiSource Inc.													
Borrowing Balance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Investor Balance	\$231,050	\$227,637	\$260,346	\$19,841	\$38,882	\$40,573	\$15,013	\$22,573	\$27,537	\$26,863	\$67,267	\$99,292	\$269,502

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TUS -2. What other short-term borrowing vehicles are available to Columbia Gas of PA?
Please provide the rates and borrowing limits under these facilities and whether the
Columbia Gas of PA has any current borrowings under these facilities.

Response:

Columbia Gas of PA is engaged in an accounts receivable securitization program with Columbia Gas of Pennsylvania Receivables Corporation, which the Commission approved in Docket No. P-2009-2099333 . The balance and borrowing limits under this program vary with seasonality. The maximum borrowing limit is \$75,000,000. The balance as of 8/31/2017 was \$15,000,000. The rate on this program as of 8/31/2017 was 1.88%. Columbia Gas of PA is not engaged in any other short-term borrowing vehicles.

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TUS -3. Please describe the business purposes of all non-regulated NiSource Money Pool entities.

Response:

Please see Attachment A to this response.

<u>Name</u>	<u>Business Purpose</u>
NiSource Corporate Group, LLC	Holding company which owns stock of various corporate subsidiaries
NiSource Gas Distribution Group, Inc.	Holding company of various gas distribution companies
NiSource Corporate Services Company	Management services company
NiSource Energy Technologies, Inc.	Investments in energy technology
NiSource Insurance Corporation, Inc.	Insurance company, captive insurer
NiSource Development Company, Inc.	Holding company which owns stock of various non-utility subsidiaries
Lake Erie Land Company	Commercial and residential real estate development
Columbia Gas of Pennsylvania Receivables Corporation	Financing subsidiary which purchases and sells trade receivables
Columbia Gas of Ohio Receivables Corporation	Financing subsidiary which purchases and sells trade receivables
NIPSCO Accounts Receivable Corporation	Financing subsidiary which purchases and sells trade receivables

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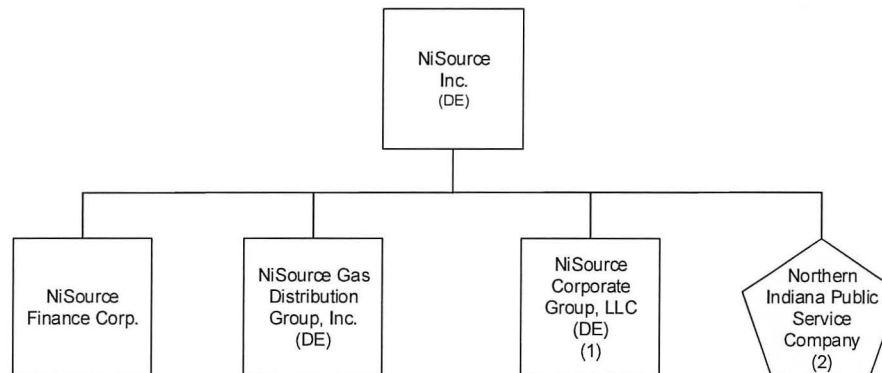
TUS -4. Please provide a corporate diagram that includes all Money Pool eligible entities.

Response:

Please see Attachment A to this response.

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NiSource Inc. Corporate Structure and Direct Subsidiaries TUS-4



Shaded boxes represent Marketing and Energy Affiliates, as those terms are defined by the Federal Energy Regulatory Commission. Pentagonal shaped boxes represent Transmission Providers. Each subsidiary is 100% owned, unless a smaller percentage is indicated. All entities are organized in Indiana unless otherwise noted.

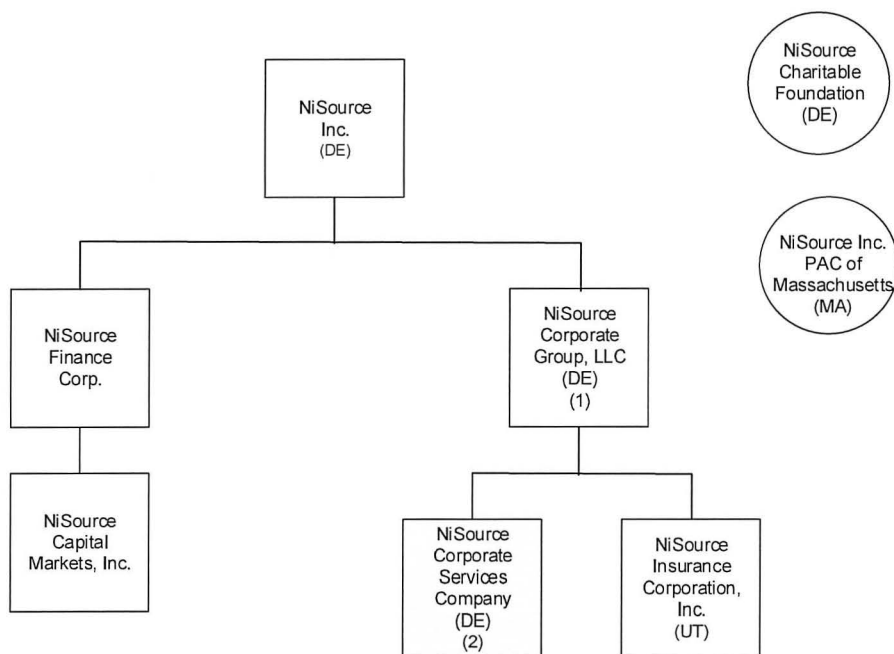
Certain support services are provided on a company-wide basis by a centralized service company, NiSource Corporate Services Company (NCSC), which is a subsidiary of NiSource Corporate Group, Inc. NCSC provides the following services to NiSource Transmission Providers, Marketing and Energy Affiliates, and other direct or indirect subsidiaries of NiSource Inc.: (a) accounting and budget; (b) human resources; (c) information technology; (d) legal; (e) tax; (f) corporate communications; (g) insurance procurement; (h) risk management; (i) corporate credit; (j) investor relations; (k) real estate; (l) internal audit; and (m) supply chain non-energy procurement.

(1) Converted from a C Corporation on June 2, 2017.

(2) Northern Indiana Public Service Company (NIPSCO) is a combined electric and gas utility. Within NIPSCO are: an electric public utility Transmission Provider, a retail electric service provider, a gas local distribution (LDC) provider, and employees engaged in wholesale power trading. The gas LDC and employees engaged in wholesale power trading are treated as Marketing and Energy Affiliates.

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NiSource Inc. - Corporate Center Subsidiaries TUS-4



Shaded boxes represent Marketing and Energy Affiliates, as those terms are defined by the Federal Energy Regulatory Commission. Pentagonal shaped boxes represent Transmission Providers. Each subsidiary is 100% owned, unless a smaller percentage is indicated. Circles represent not-for-profits. All entities are organized in Indiana unless otherwise noted.

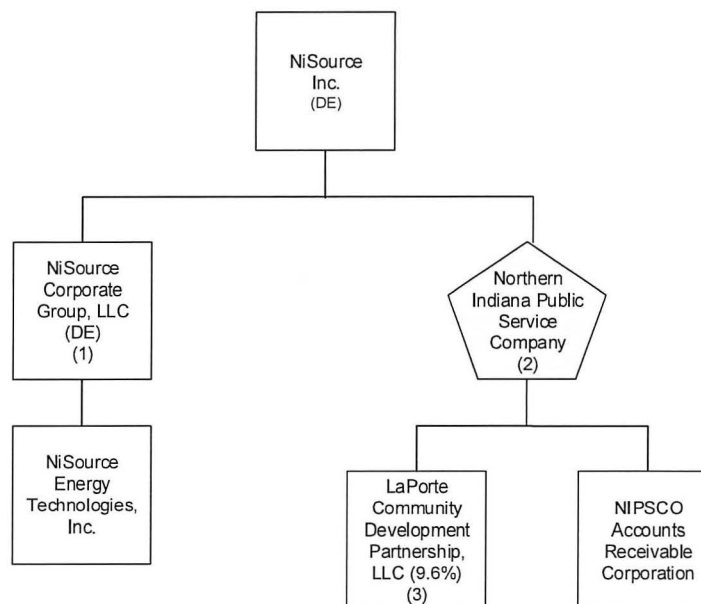
(1) Converted from a C Corporation on June 2, 2017.

(2) A division of NiSource Corporate Service Company, is treated as a Marketing and Energy Affiliate.

Certain support services are provided on a company-wide basis by a centralized service company, NiSource Corporate Services Company (NCSC). NCSC provides the following services to NiSource Transmission Providers, Marketing and Energy Affiliates, and other direct or indirect subsidiaries of NiSource Inc.: (a) accounting and budget; (b) human resources; (c) information technology; (d) legal; (e) tax; (f) corporate communications; (g) insurance procurement; (h) risk management; (i) corporate credit; (j) investor relations; (k) real estate; (l) internal audit; and (m) supply chain non-energy procurement.

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NiSource Inc. - NIPSCO & Additional Other Products and Services Subsidiaries TUS - 4



Shaded boxes represent Marketing and Energy Affiliates, as those terms are defined by the Federal Energy Regulatory Commission. Pentagonal shaped boxes represent Transmission Providers. Each subsidiary is 100% owned, unless a smaller percentage is indicated. All entities are organized in Indiana unless otherwise noted.

(1) Converted from a C Corporation on June 2, 2017.

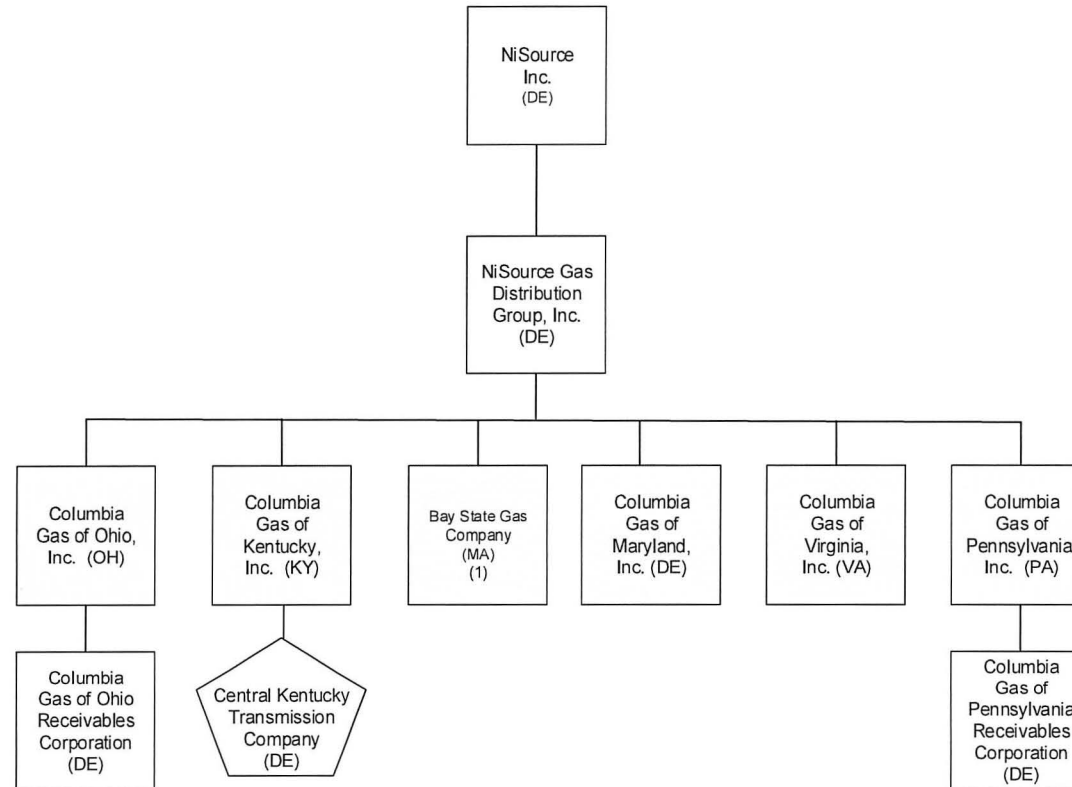
(2) Northern Indiana Public Service Company (NIPSCO) is a combined electric and gas utility. Within NIPSCO are: an electric public utility Transmission Provider, a retail electric service provider, a gas local distribution (LDC) provider, and employees engaged in wholesale power trading. The gas LDC and employees engaged in wholesale power trading are treated as Marketing and Energy Affiliates.

(3) Investment in community development entity.

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NiSource Inc. - NiSource Gas Distribution & Additional Other Products and Services Subsidiaries TUS - 4

TUS - 4
Attachment A



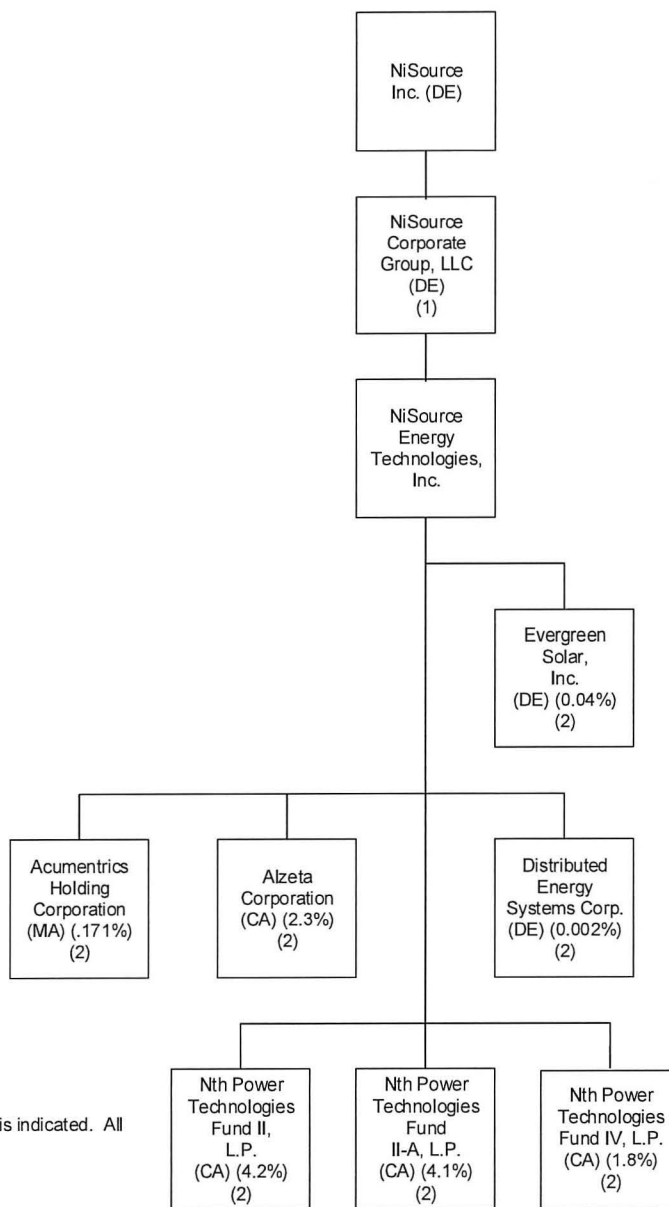
Shaded boxes represent Marketing and Energy Affiliates, as those terms are defined by the Federal Energy Regulatory Commission. Each subsidiary is 100% owned, unless a smaller percentage is indicated. All entities are organized in Indiana unless otherwise noted.

(1) Bay State Gas Company d/b/a Columbia Gas of Massachusetts

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NiSource Inc. - Certain Other Products and Services Subsidiaries and Investments

TUS-4



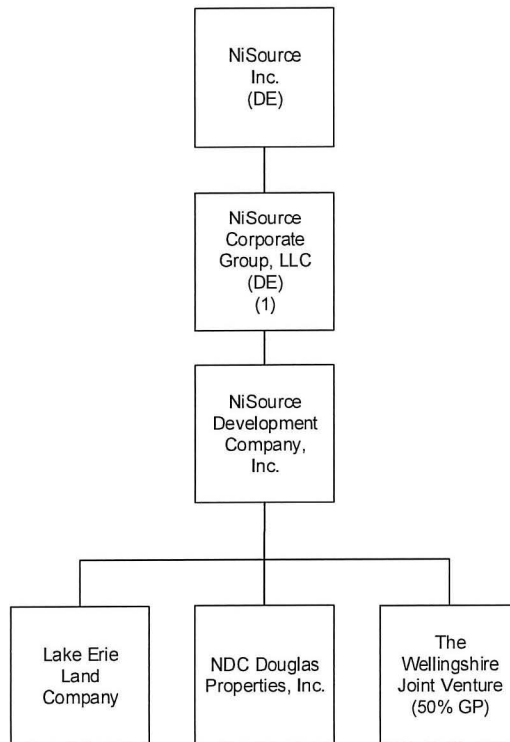
Each subsidiary is 100% owned, unless a smaller percentage is indicated. All entities are organized in Indiana unless otherwise noted.

(1) Converted from a C Corporation on June 2, 2017.

(2) These entities are investments in energy technologies.

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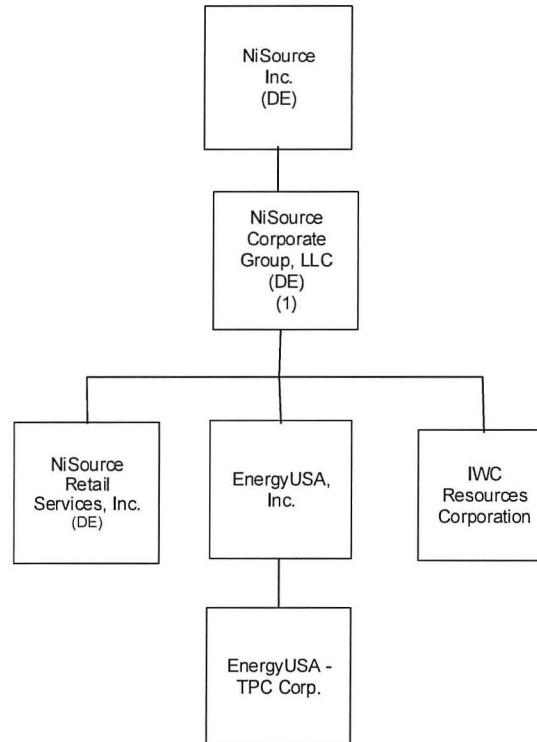
NiSource Inc. - Certain Other Products and Services Subsidiaries and Investments TUS -4



Each subsidiary is 100% owned, unless a smaller percentage is indicated. All entities are organized in Indiana unless otherwise noted.

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NiSource Inc. - Certain Other Products and Services Subsidiaries TUS - 4



(1) Converted from a C Corporation on June 2, 2017.

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Data Request

TUS -5. Please provide the Short-Term Investments Policy approved by the Finance Committee of the Board of Directors of NiSource.

Response:

Please see Attachment A to this response.



POLICY SUBJECT: Short-Term Investment Policy

EFFECTIVE DATE: August 24, 2004

Authority

The Audit Committee of the Board of Directors ("Audit Committee") of NiSource Inc. ("NiSource") has authorized the Executive Vice President and Chief Financial Officer ("Chief Financial Officer") of NiSource, the Vice President and Treasurer ("Treasurer") of NiSource, and certain officers of NiSource Corporate Services Company ("Corporate Services") to invest surplus cash of NiSource and its subsidiaries in short-term investments and, in connection with such investments, to execute any and all instruments and agreements relating to the acquisition of short-term investments, in accordance with the following Short-Term Investment Policy ("Policy") (a) on behalf of and for the account of NiSource and/or its subsidiaries, and (b) in Corporate Services' capacity as administrator of the NiSource System Money Pool. The investment portfolio is under the direction of the Chief Financial Officer. Investments may be made by one of the following designated officers and employees of NiSource and Corporate Services, as agents of NiSource: the Chief Financial Officer, the Treasurer, or the Assistant Treasurer of Corporate Services.

General Assumptions

This Policy has been established to ensure that short-term investments are made under the premise that safety of principal and liquidity take precedence over return on investment. Because of the changing nature of the money markets, the Policy will be reviewed by the Chief Financial Officer periodically and at any other time that the Chief Financial Officer deems that (a) the size or risk characteristics of the short-term investment portfolio have changed significantly, (b) money markets in general have changed, or (c) the credit quality limitations specified in the Policy require modification for any reason. Any changes to the Policy recommended by the Chief Financial Officer shall be reviewed and approved by the Audit Committee. In exceptional cases, short-term investments of cash (other than cash in the System Money Pool) may be made that do not comply with the Policy with the advance written approval of the Chief Financial Officer. Such investments and the reasons for them shall be reported promptly by the Chief Financial Officer to the Audit Committee.

Maximum Maturity of Investments

Investments will be made for maturities of 270 days or less, unless otherwise specifically provided herein; however, within the specified maturity

limitations, all investments will be made consistent with the liquidity requirements of NiSource and its subsidiaries.

Custody

Corporate Services may maintain custody accounts with PNC Bank, Bank One, their respective successors in interest, or any United States commercial bank or United States branch of a foreign bank having a credit rating of at least A- from Standard & Poor's Rating Group (a division of McGraw-Hill, Inc.) or its successor or A3 from Moody's Investor Services, Inc. or its successor. All securities (except book-entry commercial paper) will be delivered to, or accounted for, by one of these institutions except to the extent specifically provided otherwise in the Policy.

System Money Pool Investments

Investment of surplus funds in the NiSource System Money Pool shall be made in accordance with the requirements of Section 2.3 of the System Money Pool Agreement, as amended, as approved by the Securities and Exchange Commission and from time to time in effect.

Investments of Other Funds

Investment of other surplus funds may be made in one or more of the following types of short-term investments:

A. Government Securities

Investments may be made in bills, notes and bonds issued or guaranteed by the United States Government or its major sponsored agencies with maturities of up to one year.

B. Repurchase Agreements

Investments may be made in repurchase agreements with A-rated or higher commercial banks or with principal domestic securities dealers.

Repurchase agreements will be secured by perfected pledges of securities which are direct obligations of the United States Government or its major agencies, or instruments secured by such securities.

Securities supporting repurchase agreements will be "marked to market" at least weekly and the market value of such securities will not be permitted to fall to less than 97% of the dollar amount of the investment.

C. Commercial Paper – Domestic Issuers

Investments may be made in commercial paper up to a maximum principal amount of \$20 million per issuer for each domestic

corporation maintaining commercial paper ratings of A-1 and/or P-1 with senior long-term debt ratings of "A" or higher. Further, commercial paper secured by a support agreement from an "A" rated affiliate or by a "direct pay" letter of credit from domestic commercial banks with "A" rated long-term debt may be purchased in aggregate principal amounts not exceeding \$20 million per support entity.

D. Bank Securities – Domestic Issuers

Investments may be made in, either directly or in the secondary market, in time deposits, certificates of deposit, notes, bankers acceptances or commercial paper issued by domestic banks or bank holding companies which maintain a long-term debt rating of "A" or higher on senior debt and, if commercial paper is purchased, a rating of A-1 and/or P-1. No more than \$20 million will be invested directly in the obligations of any bank and its related holding company.

E. Money Market Sweep Accounts

Investments may be made in professionally managed Money Market Sweep Accounts whose portfolios are investing in money market securities. Further, sweep account fund assets must fall substantially within the Policy set forth in items A-D above.

NOTE: "Commercial Paper" includes commercial paper programs exempt under the Securities Act by either Section 3(A)(3) or 4(2), project notes or other special purpose investments so long as they carry the same ratings and have the same market attributes as conventional commercial paper.