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VIA ELECTRONIC FILING

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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17105-3265

**RE: Replacement of Older Plastic Pipe in Natural Gas Distribution Systems
Docket No. M-2024-3050313**

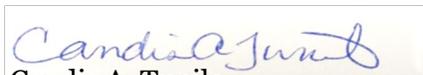
Dear Secretary Chiavetta:

Please be advised that Columbia Gas of Pennsylvania, Inc. (“Columbia”) supports the Comments submitted by the Energy Association of Pennsylvania (“EAP”) on this date at the above docket. Columbia appreciates the Public Utility Commission’s (“Commission”) focus on pipeline safety and provides the following additional information.

On December 28, 2022, Columbia filed its Third Long-Term Infrastructure Improvement Plan (“LTIIP”) at Docket No. P-2022-3037388. Therein, Columbia sought approval to include, *inter alia*, pre-1982 plastic pipe as “eligible infrastructure” pursuant to Section 1351(2), 66 Pa. C.S. § 1351(2), due to its operational history demonstrating that it is vulnerable to stress propagation cracking. As of January 1, 2022, Columbia had approximately 634 miles of pre-1982 plastic in its 7,716 miles of distribution main. The determination to seek approval to include pre-1982 plastic pipe as “eligible infrastructure” in the third LTIIP was made pursuant to Columbia’s management discretion based on the unique characteristics of Columbia’s distribution system and service territory, as well as Columbia’s Distribution Integrity Management Plan (commonly referred to as “DIMP”). The Commission approved Columbia’s third LTIIP by Order dated April 20, 2023.

Columbia appreciates the opportunity to comment on this topic and looks forward to working with the Commission and stakeholders on this matter. Should you have any questions, please do not hesitate to contact the undersigned at (223) 488-0794.

Very truly yours,



Candis A. Tunilo

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