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File #: 126872

December 11, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of National Fuel Gas Distribution Corporation For Approval Of A Major Modification To Its Existing Long-Term Infrastructure Improvement Plan For The Period January 1, 2023 Through December 31, 2027
Docket No. P-2022-3034957

Dear Secretary Homsher:

Enclosed for filing is the Petition of National Fuel Gas Distribution Corporation for Approval of a Major Modification to Its Existing Long-Term Infrastructure Improvement Plan for the Period January 1, 2023 through December 31, 2027. Copies are being served on the statutory advocates and all active parties of record to the Company's most recent base rate proceeding at Docket Nos. R-2022-3035730, *et al.*, as indicated on the Certificate of Service.

Sincerely,

Anthony D. Kanagy
Principal

ADK/sa
Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Allison Kaster, Esquire
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Harrisburg, PA 17105-3265

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Joseph L. Vullo, Esquire
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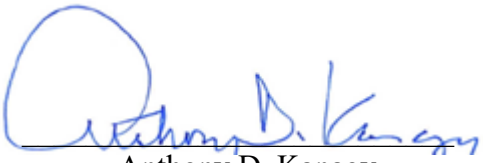
Forty Fort, PA 18704
PA Weatherization Providers Task Force, Inc.

Date: December 11, 2025



Anthony D. Kanagy

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of National Fuel Gas Distribution Corporation For Approval Of A Major Modification To Its Existing Long-Term Infrastructure Improvement Plan For The Period January 1, 2023 Through December 31, 2027	:	Docket No. P-2022-3034957

PETITION OF NATIONAL FUEL GAS DISTRIBUTION CORPORATION FOR APPROVAL OF A MAJOR MODIFICATION TO ITS EXISTING LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN

National Fuel Gas Distribution Corporation ("National Fuel" or the "Company") hereby files this Petition for approval of a Major Modification to its Existing Long-Term Infrastructure Improvement Plan ("Existing LTIIP") for the period January 1, 2023 through December 31, 2027. This filing is being made pursuant to the Pennsylvania Public Utility Commission's ("Commission") regulations at 52 Pa. Code § 121.1 *et. seq.*

Under its Existing LTIIP, the Company anticipates the replacement of all bare steel and wrought iron pipe by 2039. During the term of the Existing LTIIP, the Company is replacing approximately 264 miles of Leak Prone Pipe ("LPP"). As explained below, the Company has experienced and is continuing to experience increases in costs for replacing LPP. Since 2021, the Company has seen its average cost per mile for LPP replacement costs increase, and the Company anticipates that its Existing LTIIP costs will increase by approximately 30%.

By this Petition, the Company respectfully requests that the Commission approve National Fuel's Modified LTIIP, which is attached hereto as in clean and redline versions as Attachments "1" and "2," respectively.

I. INTRODUCTION AND BACKGROUND

1. National Fuel is a "public utility" and a "natural gas distribution company" ("NGDC") as those terms are defined in Sections 102 and 2202 of the Code, 66 Pa. C.S. §§ 102, 2202. National Fuel owns property in Pennsylvania for the transmission and distribution of natural gas and provides natural gas distribution service to approximately 217,000 customers over 4,917 miles of pipe in various communities in the counties of Armstrong, Butler, Cameron, Clarion, Clearfield, Crawford, Elk, Erie, Forest, Jefferson, McKean, Mercer, Venango and Warren, Pennsylvania.

2. The names, addresses and telephone number of National Fuel's attorneys for the purposes of this filing are as follows:

> Anthony D. Kanagy, Esquire (PA ID #85522)
> Megan E. Rulli (PA ID # 331981)
> Post & Schell, P.C.
> 17 North Second Street, 12th Floor
> Harrisburg, PA 17101-1601
> Phone: (717) 731-1970
> E-mail: akanagy@postschell.com
> E-mail: mrulli@postschell.com

National Fuel's attorneys are authorized to receive all notices and communications regarding this filing. In addition, National Fuel requests that a courtesy copy of all notices and communications regarding this matter be sent to Randy C. Rucinski, Esquire, via e-mail at rucinskir@natfuel.com.

3. The Commission's regulations at 52 Pa. Code § 121.3(a) provide that the LTIIP must include the following eight major elements:

> (1) Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.
>
> (2) An initial schedule for planned repair and replacement of eligible property.
>
> (3) A general description of location of eligible property.

(4) A reasonable estimate of quantity of eligible property to be improved or repaired.

(5) Projected annual expenditures and means to finance the expenditures.

(6) A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers.

(7) A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner.

(8) A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIIP.

4. The Company's Amended LTIIP for 2023-2027, which is attached hereto, meets the requirements included in the Commission's regulations.

II. NEED FOR A MAJOR MODIFICATION

5. On September 2, 2022, National Fuel filed its Existing LTIIP for 2023-2027.

6. The Company's Existing LTIIP was approved by the Commission on December 22, 2022.

7. The Commission's regulations at 52 Pa. Code § 121.5(a) provide that a utility electing to include a major modification to its LTIIP during the term of its LTIIP must file a petition for approval of the modification. A "major modification" includes an increase to the total estimated cost of the LTIIP by more than 20%. 52 Pa. Code § 121.2

8. National Fuel committed to certain LPP replacement mileage for each calendar year throughout the lifetime of its current LTIIP. The following table illustrates the mileage the Company committed to replace as part of its current LTIIP as well as the actual miles replaced per

year through 2024. The table also identifies the miles the Company plans to replace throughout the remainder of its current LTIIP.

Year	Type	Existing LTIIP Mileage	Actual Mileage	Amended LTIIP Mileage
2023	Distribution < 124 psig	44	45.9	
	Transmission & High Pressure > 124 psig	4	3.8	
	Total	**48**	**49.7**	
2024	Distribution < 124 psig	45	44.9	
	Transmission & High Pressure > 124 psig	7	7.8	
	Total	**52**	**52.7**	
2025	Distribution < 124 psig	46		46
	Transmission & High Pressure > 124 psig	7		5
	Total	**53**		**51**
2026	Distribution < 124 psig	47		50
	Transmission & High Pressure > 124 psig	7		4
	Total	**54**		**54**
2027	Distribution < 124 psig	50		50
	Transmission & High Pressure > 124 psig	7		7
	Total	**57**		**57**
LTIIP Total LPP Mileage		**264**	**264.4**	

9. Per the table above, the Company has met its LPP mileage targets in each year of its current LTIIP with less than 4% variance. In 2025, the Company reduced the LPP mileage from 53 miles to 51 miles to reduce overall spending without impacting overall LTIIP mileage as LPP mileage reduction has been trending ahead of projections. The total amended LTIIP mileage is planned to be consistent with initial LTIIP projections with less than 1% variance.

10. In order to meet the committed level of LPP replacement miles, the Company will need to increase its capital expenditures for each remaining year of its current LTIIP. The table below summarizes the Company's actual expenditures for years 2023-2025 as well as amended projected expenditures for years 2026-2027 of its current LTIIP.

Year	LTIIP Projection ($MM)	Amended LTIIP Projection ($MM)	Increase ($MM)	Percentage Increase
2023	$34.1	$37.2	$3.1	9%
2024	$37.9	$48.5	$10.6	28%
2025	$38.7	$43.8	$5.1	13%
2026	$39.1	$57.4	$18.3	47%
2027	$45.8	$66.5	$20.7	45%
Total	**$195.6**	**$253.3**	**$57.7**	**30%**

11. The table above illustrates that for LTIIP years 2023 through 2025, the Company's spend exceeded the original annual projections by up to 28% and that the Company's Amended LTIIP spending for the years 2026-2027 will increase by up to 47% from the original LTIIP projections. The total estimated cost of the Company's LTIIP will increase by 30% cumulatively, from $195.6MM as originally projected, to $253.3MM as projected in this Petition.

12. Because National Fuel's total capital expenditures are projected to increase by more than 20%, the Company is requesting approval of this major modification of its current LTIIP. The increases in capital spend established herein are necessary for the Company to meet the accelerated LPP replacement commitments in its current LTIIP.

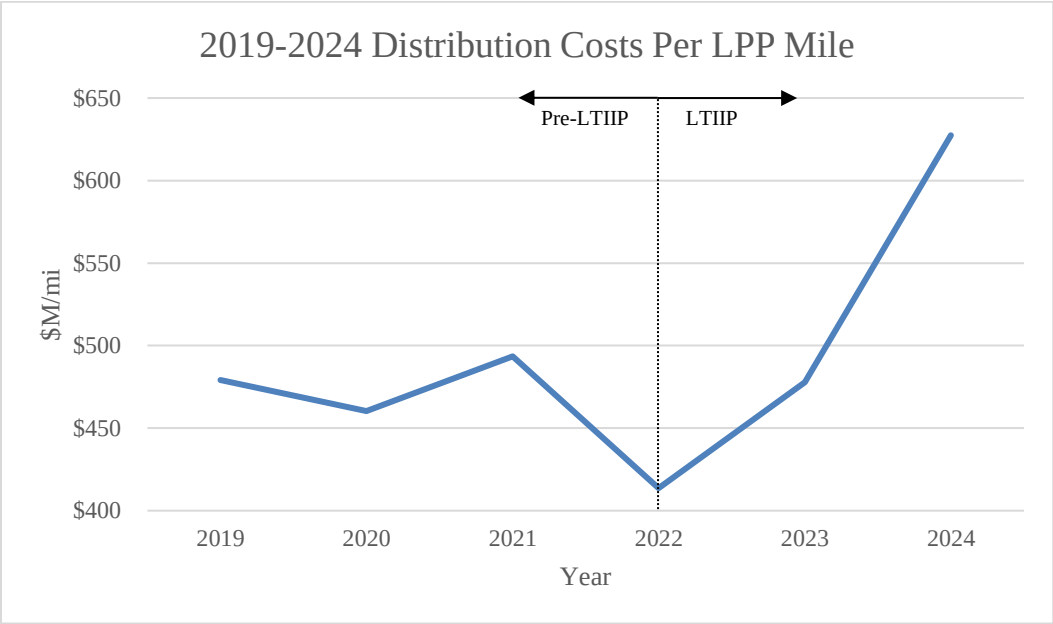
III. JUSTIFICATION FOR A MAJOR MODIFICATION

13. National Fuel's current LTIIP expenditures exceed the originally projected expenditures by more than 20% for many reasons, including but not limited to, increased restoration costs, material costs, contractor costs, permitting costs, and overall inflationary increases from the COVID pandemic.

14. The outlined projected expenditures in this Petition were developed by using updated average cost per mile estimates based on spending from actual construction projects. The

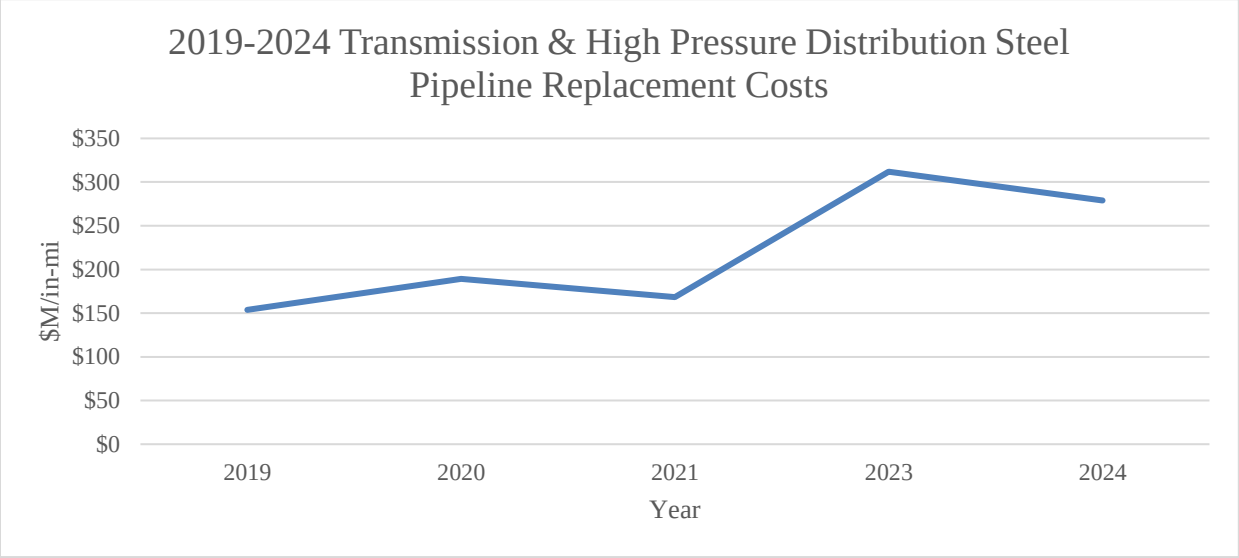
Existing LTIIP projected expenditures were developed using data from 2021. Since that time, the Company has seen its average cost per mile for LPP increase by 27%.

15. The graph below shows the Company's average cost per LPP mile from 2019-2024.



16. As the graph shows, the average cost per LPP mile increased dramatically from 2022 to 2024 in comparison to previous years. Prior to the Company's current LTIIP, between 2019 and 2022, the average cost per LPP mile was approximately $460,000. Throughout the first two years of the Company's current LTIIP, between 2023 and 2024, the average cost per LPP mile increased by over 30%, from $478,000 to $627,000.

17. The graph below shows the Company's average cost per diameter-inch mile for transmission and high-pressure Distribution replacements throughout 2019-2024.



18. As the graph shows, the average cost per diameter-inch mile increased dramatically from 2021 to 2024 in comparison to previous years. Prior to the Company's current LTIIP, between 2019 and 2021, the average cost per diameter-inch mile for transmission and high-pressure Distribution steel pipeline replacement was approximately $170,000. Throughout the lifetime of the Company's current LTIIP the average cost per diameter-inch mile has increased over 73% to approximately $295,000.

19. The Company replaced 49.7 miles of LPP in 2023 and 52.7 miles of LPP in 2024, a mileage increase of approximately 6%. Expenditures associated with 2023 were $37.2 million and expenditures in 2024 were $48.5 million, an expenditure increase of over 30%.

20. National Fuel's blanket pipeline contractor contract pricing has also increased in recent years. Work completed under these contracts account for approximately 30-40% of National Fuel's annual LPP replacement mileage. The Company renews blanket pipeline contracts on a 3-year basis. These renewed contracts typically include a contractor established price with

an annual increase to account for inflationary factors. The average blanket pipeline contractor pricing increased at a rate of approximately 2% annually throughout 2019-2022, however throughout 2023-2025 the pricing has increased at a rate of approximately 5% annually.

21. In accordance with Supplement No. 239 to Tariff Gas - Pa. PUC No. 9 ("Supplement"), the Company, beginning in Fiscal Year ("FY") 2022, began a five-year pass-back of over-collected Other Post Employment Benefit ("OPEB") dollars. A portion of that was attributable to ratepayer contributions, with the remaining balance attributable to affiliate transactions and capital labor. Per the Supplement (p. 23 of Attachment A), the regulatory liability balance not attributable to ratepayers is to be transferred into an account separate from the regulatory liability due to ratepayers and used to reduce the cost of labor charged to capital projects and affiliates over a period of 5 years (FY22-FY26). During the five-year period of the pass back, FY22-FY26, Pennsylvania Division capital saw an annual benefit of approximately $3.8 MM per year. This benefit materialized in the internal costs associated with mains and services replaced by Company personnel. Beginning in FY27, this pass back will expire, as the balance in the regulatory liability will be zero. As a result, the Company will experience higher capital costs starting in FY27 for mains and service replacements.

22. National Fuel plans to continue to repair, improve, and replace its eligible infrastructure at the rate established in its Existing LTIIP. Due to factors outlined in this Petition, the Company expects costs to increase as shown above. Therefore, the Company's request for a major modification of its Existing LTIIP to amend projected expenditures throughout 2025-2027 is necessary to continue accelerated replacement of its aging infrastructure and to maintain safe and reliable service.

IV. SERVICE

23. Pursuant to the Commission's regulations at 52 Pa. Code § 121.4(a), National Fuel is serving this Petition and Amended LTIIP on the statutory advocates, and all of the parties of record in the Company's most recent base rate proceeding at Docket No. R-2022-3035730.

V. CONCLUSION

WHEREFORE, National Fuel Gas Distribution Corporation respectfully requests that the Pennsylvania Public Utility Commission approve this Major Modification to the Company's Long-Term Infrastructure Improvement Plan for the Period January 1, 2023 through December 31, 2027.

Respectfully submitted,

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Date: December 11, 2025

Counsel for National Fuel Gas Distribution Corporation

ATTACHMENT 1

National Fuel Gas Distribution Corporation

Amended Long Term Infrastructure Improvement Plan

December 11, 2025

Table of Contents

National Fuel Gas Distribution Corporation
Amended Long-Term Infrastructure Improvement Plan

I. Introduction

In compliance with requirements of 66 Pa. C.S. § 1352(a) and the Commission's regulations, 52 Pa. Code § 121.1 *et. seq*.), National Fuel Gas Distribution Corporation ("National Fuel", "Distribution", or the "Company") respectfully submits its Long-Term Infrastructure Improvement Plan ("LTIIP" or "Plan") covering the period of 2023 through 2027 with the Pennsylvania Public Utility Commission (the "Commission").

The LTIIP shall guide the Company's accelerated repair and replacement of its distribution system in its Pennsylvania service territory. As detailed here within the plan, the Company provides information in response to the Commission's eight required elements.

II. Background

Headquartered in Williamsville, New York, National Fuel delivers natural gas to more than 749,000 residential, commercial, and industrial customers in Western New York and Northwest Pennsylvania through its nearly 14,825 mile pipeline system. Specifically in Pennsylvania, approximately 215,000 customers are served through 4,917 miles of pipeline.

III. LTIIP Requirements

1. Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.

- Gas Distribution and Transmission Mains, Valves, Fittings, Couplings, and Appurtenances
- Gas Service Lines, Excess Flow Valves (EFVs), Curb Valves, Meter Sets, Risers, Meter Bars, Meters, and Appurtenances
- City Gate Stations, District Regulator Stations, Production Stations, Telemetry, Overpressure Protection, and Regulator Station Appurtenances
- Farm Taps
- System Reliability Improvements
- Vintage Plastic Replacements
- Mandated Facility Relocations due to highway/city/township/municipal projects (unreimbursed costs)
- Other Related Capitalized Costs – Equipment, Tools, Corrosion Control Equipment, Vehicles, Supporting Information Technology, and Appurtenances

National Fuel's plan to upgrade this eligible property within the pipeline system will help to maintain safe and adequate service while containing operations and maintenance costs. The Company will continue to employ a risk-based system modernization process to continue delivering safe and reliable natural gas service to its approximately 215,000 residential, commercial, and industrial customers in Northwestern Pennsylvania.

Gas Distribution and Transmission Mains, Valves, Fittings, and Couplings

National Fuel's distribution and transmission mainlines have been installed over multiple decades and are comprised of many different types of materials including Unprotected Bare Steel, Unprotected Coated Steel, Protected Bare Steel, Protected Coated Steel, Wrought Iron, and Plastic. Table 1 below shows the location of eligible distribution mainline in each of National Fuel's Responsibility Centers (RCs) / Operating Areas categorized by pipeline material.

Table 1: National Fuel's Location of Eligible Property – Distribution Main[1]

Miles of Distribution Main as of December 31st, 2021								
Responsibility Center (RC)	**Unprotected Bare Steel**	**Unprotected Coated Steel**	**Protected Bare Steel**	**Protected Coated Steel**	**Wrought Iron**	**Plastic**	**Other**	**Total**
RC311 Erie	201.5	2.4	0.0	118.7	5.4	681.2	0.6	1,009.8
RC312 West County	91.1	0.0	10.1	90.6	0.7	286.8	0.0	479.3
RC314 Warren	26.4	0.0	0.0	57.5	5.3	214.7	0.0	303.9
RC317 Corry	22.3	0.0	0.0	17.4	0.9	76.8	0.0	117.5
RC323 Bradford	9.1	0.0	0.0	46.0	6.6	142.3	0.0	204.0
RC326 Clarion	27.3	0.1	0.0	28.4	10.5	123.0	0.0	189.2
RC327 Chicora	2.2	0.0	4.8	36.6	5.6	126.3	0.0	175.5
RC329 Dubois	23.4	0.0	0.0	76.4	6.4	190.3	0.0	296.5
RC332 Elk	28.3	0.4	2.7	71.6	8.9	248.9	0.0	360.9
RC344 Meadville	60.5	0.0	46.2	90.5	9.6	262.4	0.0	469.3
RC347 Oil City	82.1	0.0	20.1	69.3	46.9	339.4	0.0	557.8
RC350 Sharon	137.0	0.7	0.1	143.3	20.9	384.7	0.0	686.6
Total	711.1	3.7	84.1	846.3	127.8	3,076.8	0.6	4,850.4

[1] **Due to rounding, values shown in Tables 1 through 4 may differ slightly from Annual DOT Reporting**

National Fuel's existing distribution mainline assets as of December 31, 2021 consist of unprotected bare steel (~15%), unprotected coated steel (< 1%), protected bare steel (~2%), protected coated steel (~17%), wrought iron (~3%), plastic pipeline (~63%), and a small portion of other (epoxy fiberglass) main (< 1%). Table 2 below shows the age profile of eligible distribution mainline throughout National Fuel's territory.

Table 2: National Fuel's Age Profile of Eligible Property – Distribution Main[1]

Age Profile of Distribution Main as of December 31st, 2021	
Decade of Installation	**Miles**
Pre-1940	341.4
1940's	85.8
1950's	360.9
1960's	603.2
1970's	694.6
1980's	820.2
1990's	801.4
2000's	495.1
2010's	470.8
2020's	77.4
Unknown	99.7
Total	4,850.4

Nearly 29%, or 1,391 miles, of National Fuel's existing distribution mainlines, as of December 31, 2021, is comprised of pipelines installed prior to 1970. National Fuel does not replace pipeline strictly based on the age of the facility; however, older pipeline is generally comprised of vintage material which is a factor considered in the Company's risk model and System Modernization Program (SMP). Distribution main is considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(i), 1351(2)(ii), and 1351(2)(iv).

Table 3 below shows the location of eligible transmission main in each of National Fuel's Responsibility Centers sorted by pipeline material.

Table 3: National Fuel's Location of Eligible Property – Transmission Main[1]

Miles of Transmission Main as of December 31st, 2021			
Responsibility Center (RC)	**Protected Bare Steel**	**Protected Coated Steel**	**Total**
RC311 Erie	0.0	3.6	3.6
RC312 West County	20.3	7.8	28.0
RC314 Warren	0	0	0
RC317 Corry	2.3	0.0	2.3
RC323 Bradford	0	0	0
RC326 Clarion	0	0	0
RC327 Chicora	0	0	0
RC329 Dubois	0	0	0
RC332 Elk	0	0	0
RC344 Meadville	3.6	2.1	5.7
RC347 Oil City	11.1	15.7	26.8
RC350 Sharon	0	0	0
Total	37.3	29.2	66.4

National Fuel's existing transmission main, as of December 31, 2021, consists of protected bare steel (~56%) and protected coated steel (~44%). Table 4 below shows the age profile of eligible transmission main throughout National Fuel's territory.

Table 4: National Fuel's Age Profile of Eligible Property – Transmission Main[1]

Age Profile of Transmission Main as of December 31st, 2021	
Decade of Installation	**Miles**
Pre-1950	0.0
1950's	37.1
1960's	8.3
1970's	0.1
1980's	7.4
1990's	7.4
2000's	0.3
2010's	3.8
2020's	2.0
Total	66.4

Approximately 68%, or 45 miles, of National Fuel's existing transmission main, as of December 31, 2021, is comprised of pipeline installed prior to 1970. Like distribution main, National Fuel does not replace pipeline strictly based on the age of the facility, however older transmission main is typically comprised of bare steel which is a factor considered in the Company's risk model and SMP. Transmission main is considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(i), 1351(2)(ii), and 1351(2)(iv).

Gas Service Lines, Excess Flow Valves (EFVs), Curb Valves, Meter Sets, Risers, Meter Bars, Meters, and Appurtenances

National Fuel's service lines are distribution lines that transport gas from a common source of supply to an individual customer, to two adjacent or adjoining residential or small commercial customers, or to multiple residential or small commercial customers served through a meter header or manifold. A service line ends at the outlet

of the customer meter or at the connection to a customer's piping, whichever is further downstream. National Fuel owns all of the service lines in its service territory.

EFVs and/or curb valves may be installed on newer gas service lines directly downstream of the mainline tap as a safety measure in the event of service line damage. The EFV will automatically prevent gas from flowing through the service line if there is a failure of the service between the mainline and meter. When the gas flow through the EFV exceeds a designated rate, the valve automatically closes and stops all, or a major portion, of the gas flow.

Curb valves allow National Fuel to isolate the service line completely from the source of gas in the event of failure on the service line. Other eligible property included on National Fuel's service lines includes, but is not limited to, line taps, risers, meter bars, meters, and meter set piping. National Fuel owns and operates 193,636 service lines as of December 31, 2021, as shown in Table 5 below.

Table 5: National Fuel's Location of Eligible Property – Service Lines

Service Lines by Material as of December 31st, 2021				
Responsibility Center (RC)	**Bare Steel**	**Coated Steel**	**Plastic**	**Total**
RC311 Erie	5,353	671	56,747	62,771
RC312 West County	373	929	16,325	17,627
RC314 Warren	908	277	8,719	9,904
RC317 Corry	208	184	4,420	4,812
RC323 Bradford	172	144	5,308	5,624
RC326 Clarion	679	470	5,426	6,575
RC327 Chicora	102	145	2,943	3,190
RC329 Dubois	706	434	9,868	11,008
RC332 Elk	808	187	11,575	12,570
RC344 Meadville	1,654	855	12,491	15,000
RC347 Oil City	2,156	731	14,445	17,332
RC350 Sharon	3,752	1,337	22,134	27,223
Total	16,871	6,364	170,401	193,636

National Fuel's existing services, as of December 31, 2021, were comprised of 8.7% bare steel pipeline, 3.3% coated steel pipeline, and 88% plastic pipeline. The majority of existing services are comprised of plastic or bare steel. The bare steel pipeline services are considered early vintage material and as a result have a higher risk factor when evaluating replacement projects. Table 6 below shows the age profile of eligible service lines throughout National Fuel's territory.

Table 6: National Fuel's Age Profile of Eligible Property – Service Lines

Age Profile of Service Lines as of December 31st, 2021	
Decade of Installation	**Number of Services**
Pre-1940	6,036
1940's	1,808
1950's	4,873
1960's	7,789
1970's	26,853
1980's	34,755
1990's	40,717
2000's	34,440
2010's	30,013
2020's	6,339
Unknown	13
Total	193,636

Gas services are not replaced based strictly on material or age; however, the service line material and age are factors considered in the Company's SMP, with all associated bare steel services being replaced in connection with main replacement. Gas service lines, insulated and non-insulated fittings, valves, excess flow valves, risers, meter bars, and meters are considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(iii), 1351(2)(iv), 1351(2)(v), 1351(2)(vi), 1351(2)(vii), and 1351(2)(viii).

City Gate Stations, District Regulator Stations, Production Stations, Telemetry, Overpressure Protection, and Measurement Stations

National Fuel owns and operates 875 meter and regulator (M&R) stations as of December 31, 2021. Table 7 below shows the breakdown of regulator stations throughout National Fuel's territory.

Table 7: National Fuel's Location of Eligible Property – M&R Stations

M&R Stations as of December 31st, 2021	
Responsibility Center (RC)	**Regulator Stations**
RC311 Erie	125
RC312 West County	45
RC314 Warren	46
RC317 Corry	14
RC323 Bradford	37
RC326 Clarion	41
RC327 Chicora	27
RC329 Dubois	68
RC332 Elk	74
RC344 Meadville	123
RC347 Oil City	147
RC350 Sharon	128
Total	875

M&R stations are inspected annually to ensure safe and reliable operation. In order to maintain communication with various key stations throughout its distribution system, National Fuel operates and maintains different forms of telemetry and monitoring devices including, but not limited to, Supervisory Control and Data Acquisition (SCADA) and other forms of remote pressure monitoring.

National Fuel transports natural gas from multiple local producers throughout its service area. It is the responsibility of the producer to ensure that gas quality standards specified in National Fuel's tariff are met prior to injection into National Fuel's system. Therefore, the producer typically owns and operates any dehydrators, dryers, filters, separators, and regulation equipment at production stations. National Fuel owns and operates certain equipment downstream of the production regulation equipment, this typically includes, but is not limited to, meters, correctors, valving, odorization equipment, and overpressure protection devices.

Overpressure protection at regulator stations is typically in the form of monitor regulators, control valves, or full capacity relief valves. Immediately following the Merrimack Valley over-pressurization incident in 2018, National Fuel identified worker-monitor stations feeding low-pressure distribution systems without full capacity relief valves throughout its territory and began implementing a plan to upgrade the stations by either installing a full capacity relief valve or retiring stations through system improvements. While monitor regulators are compliant under the Code of Federal Regulations Title 49 Part 192.195 as a form of overpressure protection, National Fuel has and will continue to take steps to upgrade these stations to eliminate the potential common mode of failure presented by worker-monitor stations to protect the distribution system from over-pressurization as outlined in the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. As of September 2, 2022, National Fuel has upgraded 100 of its 162 identified worker-monitor stations feeding low-pressure

distribution systems. Relief valves are considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(iv).

Farm Taps

National Fuel defines farm taps as service lines that are directly connected to either a transmission pipeline or regulated gathering pipeline that is not operated as part of a distribution system. National Fuel owns and operates farm taps throughout its service territory. Farm tap equipment includes, but is not limited to, service taps, service lines, risers, regulation equipment, over pressure protection equipment, valving, and meters.

System Reliability Improvements (System Reliability Reports – SRRs)

National Fuel uses SRRs to identify operational concerns resulting from or caused by natural forces, other outside forces, equipment failures, incorrect operations, or other threats to National Fuel's pipeline system, M&R stations, and other pipeline facilities.

Upon discovery of a reliability concern, National Fuel documents and tracks the discovery and nature of the reliability concern as well as the immediate response and proposed long-term corrections. The SRR is received by National Fuel's Integrity Engineering Department and routed throughout Engineering, Operations, and other appropriate departments for determination of potential remediation options. National Fuel has utilized third party experts for assistance in developing remediation options to not only remediate immediate reliability concerns, but also prevent similar occurrences in the future. Once a remediation option has been agreed upon by all appropriate

Company personnel, National Fuel assembles a project team and moves forward with the remediation until completion. In many cases, an essential part of the long-term corrections is to monitor the remediation for a period of time, typically one year, after completion to ensure the system reliability issue has been permanently corrected and the system is safe for future operation. Company personnel review SRRs system-wide on a periodic basis until completion.

National Fuel's SRR identification and tracking process outlined above ensures continuous improvement of pipeline reliability and safety throughout its system.

Vintage Plastic Replacements

As outlined above, more than half of National Fuel's distribution system is comprised of plastic pipeline. Existing fusions and mechanical couplings excavated during the normal course of business are visually inspected for defects or other integrity concerns. When a visually questionable fusion or non-pullout resistant coupling is discovered, it is cut out and submitted to National Fuel's Engineering Department for analysis. Visually questionable fusions (including leaking fusions) and non-pullout resistant couplings are documented and evaluated further for remediation options. The Engineering Department analyzes visually questionable fusions and non-pullout resistant couplings and may recommend accelerated actions. Visually questionable fusions, fusion leaks, non-pullout resistant couplings, and plastic failures are documented and tracked for replacement or patrolling on either National Fuel's Plastic Pipeline Special Survey (PPSS) list or Plastic System Integrity Report (PSIR).

Remediation of fusion leaks and visually questionable fusions or non-pullout resistant couplings includes a review of as-built records to determine the number and possible locations of fusions on the project. Aerial photography is reviewed to determine the proximity of buildings. Based on the records review and the number of fusions on the job, additional fusion or coupling inspections or removal of known remaining fusions or couplings may be directed. Segments are placed on the PSIR and are leak surveyed quarterly until remedial actions are complete. Segments on the PPSS are leak surveyed semi-annually (typically April and October) until the segment is replaced or all known fusions are removed. In addition to quarterly reviews and semi-annual leak surveys, all identified PPSS and PSIR projects are reviewed twice annually at Spring and Fall construction planning meetings held at each responsibility center.

National Fuel's existing plastic pipeline is comprised of a combination of MDPE 2306, MDPE 2406, HDPE 3306, HDPE 3408/4710, and unknown vintage. Table 8 below summarizes National Fuel's plastic pipeline by vintage as of October 1st, 2025.

Table 8: National Fuel's Location of Eligible Property – Plastic Pipeline

Plastic Pipeline by Vintage as of October 1st, 2025	
Vintage	**Miles**
Aldyl A - MDPE 2306 & MDPE 2406	251.7
Orange MDPE 2306	119.0
Black HDPE 3306	0.2
Driscopipe 6500 - MDPE 2406	2.4
Yellow MDPE 2406	808.3
Black HDPE 3408/4710	565.0
Unknown	1543.9
Total	3290.4

The Company categorizes and replaces its unknown plastic pipeline through thorough record reviews as well as opportunistically throughout the course of its construction operations. This two-pronged approach has reduced the overall miles of unknown plastic by over 250 miles between 2022 and 2025, from 1,803 in 2021 to under 1,550 in 2025. The Company recognizes there is additional risk associated with unknown vintage plastic. As such, plastic with an unknown vintage in Company records is defaulted in the Company's Distribution asset risk model to the most conservative grade considering the install year.

National Fuel's vintage plastic identification and tracking process outlined above ensures continuous improvement of pipeline reliability and safety throughout its system.

Mandated Facility Relocations

National Fuel is periodically required to relocate facilities to accommodate highway and other public improvement projects. National Fuel maintains a steady stream of communication with cities, municipalities, townships, and the Department of Transportation within its territory to coordinate projects and relocations to minimize impacts. The Company sends annual letters to all municipalities and highway departments within the Company's service area, requesting information on planned infrastructure improvements (see Appendix B). Mandated facility relocations are either reimbursable or non-reimbursable depending on whether the gas facilities in conflict are located within public or private right-of-way. The unreimbursed portion of these costs is DSIC eligible as defined in 66 Pa. C.S. § 1351(2)(ix).

Other Related Capitalized Costs

The replacement and maintenance of the eligible property listed above typically results in additional costs related to but not limited to equipment, tools, corrosion control equipment, vehicles, and supporting information technology. These related costs are DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(x).

2. An initial schedule for planned repair and replacement of eligible property

The Company has designed and developed its SMP to identify and prioritize pipeline replacements on a system-wide basis using a comprehensive planning process and planning tools, including its Geographic Information System (GIS) and its Distribution Risk Application. Each Fall, at the conclusion of the annual leak survey cycle, the Company utilizes its GIS to perform a geographic leak analysis of the entire distribution system to identify areas of concentrated leakage. This analysis assigns a risk factor to each area based on the number and grade of leaks. The Company's Engineering and Operations management then review maps of higher priority areas during bi-annual planning meetings held at each operating location, to identify potential pipeline replacement projects for further development. The planning meetings also identify any system reliability concerns and potential conflicts with planned highway and municipal construction work. A review of standing agenda items ensures that all relevant system issues are considered in the Company's SMP for the upcoming construction season.

In addition to the Company's SMP, the Company's Leak Prone Pipe (LPP) Replacement Program is robust and carefully designed to ensure the safety and reliability of its system and to control leakage rates by prioritizing pipeline replacements system-wide. LPP can be defined as pipelines that are more susceptible to leakage based on the material (including bare steel, wrought iron, and historic plastics with known issues), design, or past operating and maintenance history of the pipeline. Since 2016, the Company has made significant and consistent progress in this effort, having eliminated

207 miles of its leak prone bare steel and wrought iron mains and 4,581 of its bare steel services under its SMP. Table 9 below shows the Company's calendar year end mileage of bare steel main, wrought iron main, and bare steel service count ~~over the last five years~~ between 2016 and 2021.

Table 9: Bare Steel and Wrought Iron Mileage & Bare Steel Services (2016-2021)

Bare Steel & Wrought Iron Mileage & Bare Steel Services (2016-2021)		
Year	**CY End Mainline Miles**	**CY End Bare Steel Services**
2016	1,183	21,452
2017	1,103 [2]	20,441
2018	1,065	19,518
2019	1,028	18,581
2020	978	17,758
2021	935	16,871

It is anticipated that the Company will replace approximately 40 miles of distribution bare steel & wrought iron mainline pipe in 2022. Table 10 below provides the total miles of distribution and transmission LPP (bare steel, wrought iron, and historic plastics with known issues) that the Company plans to replace during each year following the filing of its initial LTIIP (2022).

Table 10: Leak Prone Pipe Replacement (2022-2027)

Pennsylvania **Leak Prone Pipe Replacement - 5 year plan**						
	CY 2022	**CY 2023**	**CY 2024**	**CY 2025**	**CY 2026**	**CY 2027**
LPP Reduction	Miles	Miles	Miles	Miles	Miles	Miles
Distribution < 124 psig	40	44	45	46	47	50
Transmission & High Pressure > 124 psig	0	4	7	7	7	7
Total	40	48	52	53	54	57

The table above shows the Company's initial mileage replacement ramp-up from

[2] **Adjusted for 41.594 miles corrected during 2018 records review; Pipe classified as bare but identified as coated**

40 miles in CY 2022 to 48 miles in CY 2023 (including 44 miles of distribution main and 4 miles of transmission pipe & high pressure main) as well as subsequent acceleration in replacement through 2027. Figure 1 below shows the Company's remaining bare steel and wrought iron at the end of each calendar year between 2022 and 2027. The Company's retirement schedule outlined in Section 2 of this LTIIP will allow for the retirement of all bare steel and wrought iron pipe by 2039.

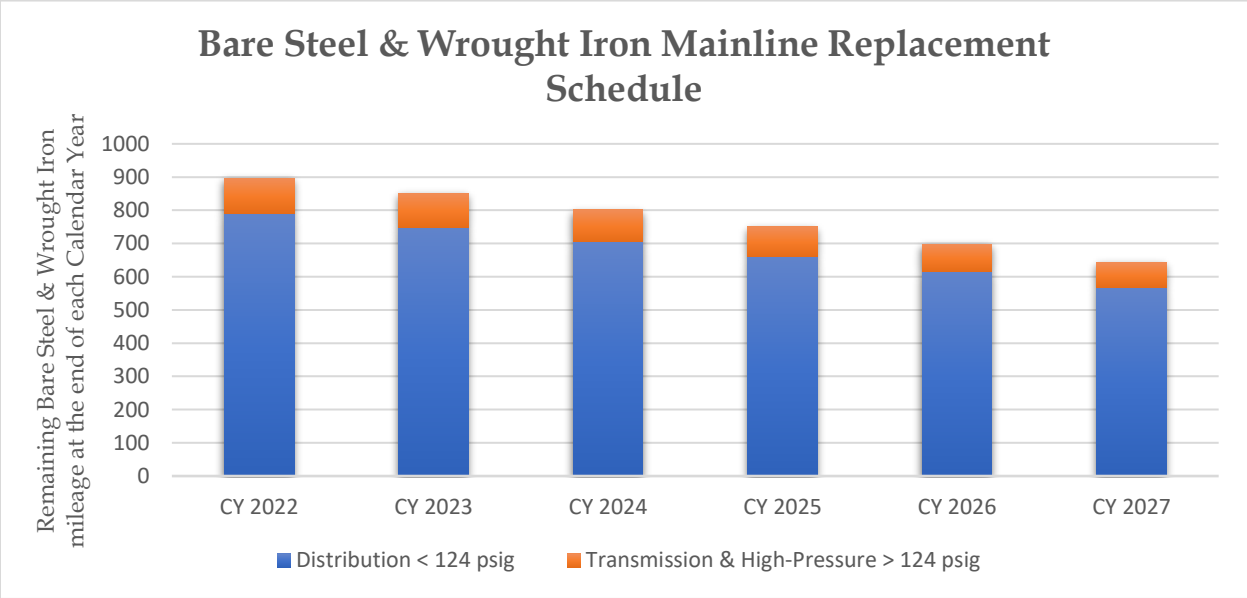

Figure 1: Bare Steel & Wrought Iron Main Replacement Schedule (2022-2027)

The SMP outlined above is consistent with National Fuel's Distribution Integrity Management Program (DIMP) as well as its Transmission Integrity Management Program (TIMP) as defined in Subpart P of 49 C.F.R. Part 192 – Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards. The purpose of National Fuel's DIMP and TIMP is to enhance safety by identifying and mitigating risks to the Company's gas distribution & transmission system.

3. A general description of location of eligible property

National Fuel's eligible property is located throughout its service territory in Northwestern Pennsylvania. This eligible property is located in Armstrong, Butler, Cameron, Clarion, Clearfield, Crawford, Elk, Erie, Forest, Jefferson, McKean, Mercer, Potter, Venango, and Warren Counties. Figure 2 below depicts the location of National Fuel's service territory.

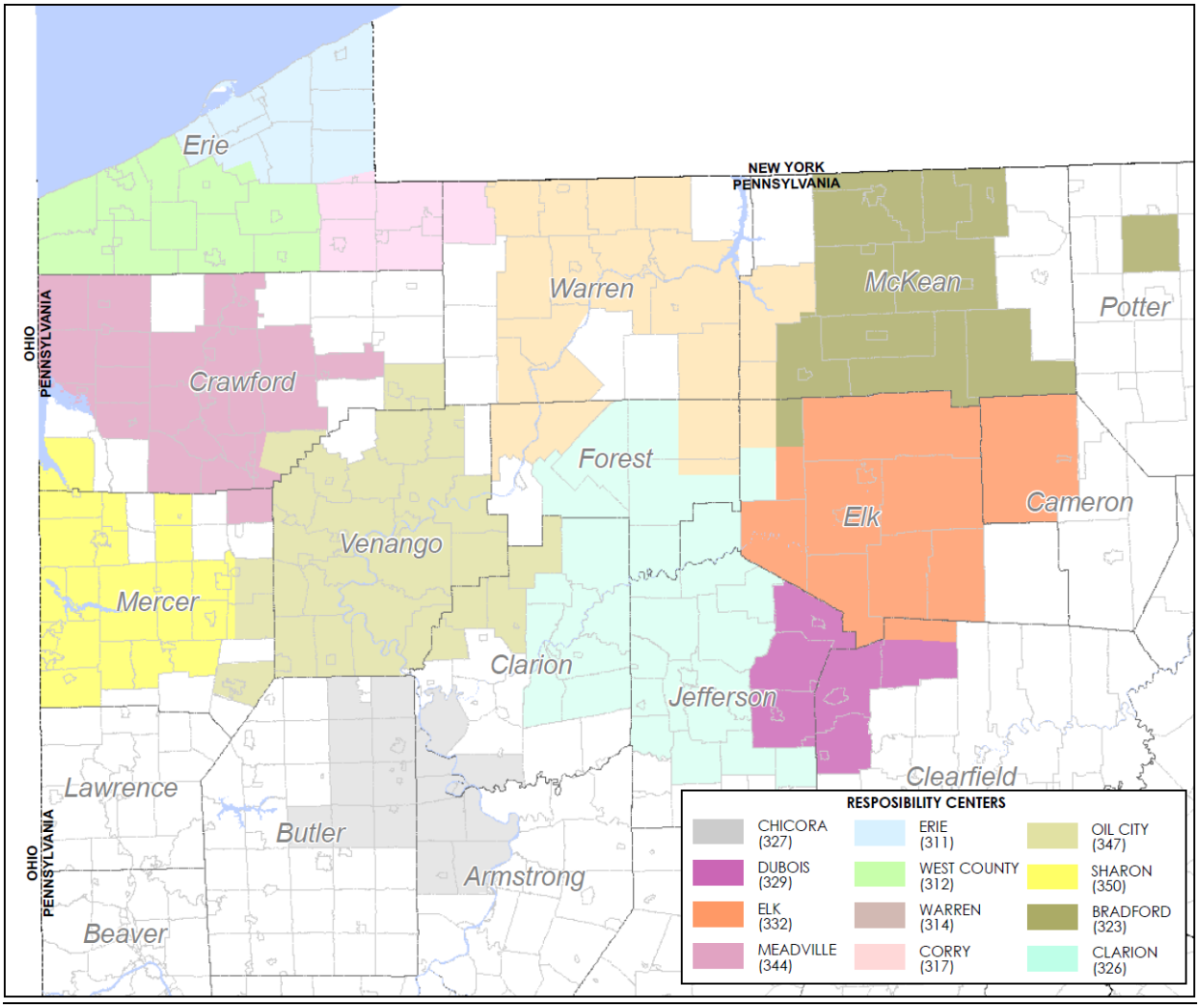

Figure 2: National Fuel's Distribution Service Territory

4. A reasonable estimate of quantity of eligible property to be improved or repaired

The Company expects to replace approximately 40 miles of bare steel and wrought iron main in 2022. The following table shows estimated quantities of eligible property to be improved under this LTIIP. For the next 5 years, the Company anticipates accelerating replacement annually.

Table 11: Estimate of Quantity of Property to be Improved

Eligible Property	2023	2024	2025	2026	2027
Distribution Main (miles)	44	45	46	47	50
HP Distribution / Transmission Main (miles)	4	7	7	7	7
Service Lines and Meter Sets	As part of its pipeline main replacement program, the Company replaces all steel service lines (bare and coated) that are attached to the main being replaced. The Company may also replace plastic service lines during main replacement. This is done to enhance the safety of difficult to locate services, when required to facilitate relocating meters outside (i.e. where the existing service entry will not accommodate an outside meter location), or when the service line is comprised of vintage plastic.				
Meter and Regulator Stations	Replacements, upgrades, and repairs to stations and related equipment as needed to ensure safe and reliable service. Accelerated actions are prescribed based on the likelihood and potential consequences of a future concern.				
Farm Taps	Replacements, upgrades, and repairs to farm taps as needed to ensure safe and reliable service. In some instances, a new main and service will be installed as opposed to replacing the existing taps.				
System Reliability Improvements	Threats to the pipeline in the categories of natural force damage (primarily washouts and exposures), equipment failure, other outside force damage, incorrect operation, gas quality, and other causes to the distribution system.				

Vintage Plastic	Plastic system leaks and reported visually questionable fusions or non-pullout resistant couplings.
Highway and Other Public Improvement Projects	Existing facilities required to be relocated due to conflicts with other utilities or government entities as needed. Coordinate pipeline replacement projects with municipal projects so that the Company may relocate facilities in advance of construction when warranted.
Other Related Capitalized Costs	As needed, invest in equipment, tools, corrosion control, vehicles, and supporting information technology to replace, repair and upgrade the eligible property described in this LTIIP.

5. Projected annual expenditures and means to finance the expenditures

Table 12 below shows the budgeted and actual capital expenditures related to the modernization of pipelines (including mainline and services), M&R stations, cathodic protection, associated costs for land/land rights, and supporting software for the fiscal years of 2017 through 2021. Total budget for the five-year period between 2017 and 2021 was $118.4MM. During this same period, the Company's actual spending was $118.9MM, resulting in a difference of 0.4%. This negligible difference in budgeted versus actual spending shows the Company's consistent and cost-effective capital execution.

Table 12: Annual Capital Expenditures Related to Modernization

Fiscal Year	Capital Expenditures	
	FY Budget ($MM)	FY Actual ($MM)
2017	$20.0	$19.8
2018	$22.2	$20.5
2019	$24.1	$25.2
2020	$26.4	$24.8
2021	$25.7	$28.7
Total	**$118.4**	**$118.9**

For fiscal year 2022, the Company has budgeted $25.4MM for modernization. Table 13 below provides the projected annual expenditures under this LTIIP. For the years 2023 through 2027, the Company expects to spend approximately $253.3MM related to modernization of pipelines. This forecast represents an increase of 113% over the total spending from 2017 to 2021. The proposed budget will increase an average of 28.4% each year of the LTIIP compared with the prior year.

Table 13: Projected Annual Capital Expenditures Related to Modernization

Fiscal Year	Capital Expenditures
	FY Budget ($MM)
2023	$37.2
2024	$48.5
2025	$43.8
2026	$57.4
2027	$66.5
Total	**$253.3**

The Company finances capital requirements through cash from operations and a mix of short-term and long-term debt provided by its Parent Company, National Fuel Gas Company. The Company's short-term financing is provided through the Parent's Money Pool Agreement and long-term financing is subject to Commission authorization,[3] which currently permits up to $300MM of additional long-term debt typically issued as intercompany promissory notes tied to the Parent's long-term debt issuances. Cash from operations, in conjunction with our short and long-term financing options, provide ample liquidity to help meet ongoing capital needs.

The Company's philosophy with respect to its SMP was developed to control unit costs, thereby maximizing LPP replacement. In designing pipeline replacement projects, the Company looks to develop larger scope projects with better economies of scale than

[3] **PAPUC Docket S-2023-3041669 Approved through 12/31/2026**

multiple smaller projects. The Company also maximizes medium-pressure replacements to reduce pipe size, which may allow insertion of new medium-pressure mains into the larger low-pressure mains being replaced, thus reducing excavation and restoration costs. Smaller diameter mains have lower unit costs in general, and medium pressure mains may eliminate the need for costly road crossings and tie-ins to establish back feeds that are required in low pressure systems. An additional benefit to expanding the medium pressure system is the relocation of gas meters from inside of homes and businesses to the outside, resulting in easier access for meter reading and less operation and maintenance expense. The Company also looks to maximize project retirement to installation ratios by avoiding cross-country installations and installations across open areas where there are no customers.

In addition to its cost-effective design philosophy, the Company controls costs using multiple qualified contractors and competitive bidding procedures. The Company has a comprehensive contractor administration program which includes standard bid conditions and procedures as well as online bidding and invoicing for efficiency. Contractor invoices submitted for payment undergo multiple levels of review and approval to ensure that quantities invoiced are proper and consistent with bid documents. At the conclusion of bid projects, the Company performs a Post Investment Analysis to compare bid estimates to actual cost and quantities installed. Any significant variances are identified and reviewed with a goal of reducing future variances. Finally,

the Company tracks and reports unit cost trends to executive management in an Annual Unit Cost Study.

6. A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers.

Under this LTIIP, National Fuel will accelerate infrastructure replacement as described in the sections above. The accelerated replacement of aging infrastructure will help maintain safe, reliable, and economic service to customers. As outlined in the Company's DIMP and TIMP, National Fuel will maintain safety by identifying, reducing, and mitigating system integrity risks. Managing the integrity and reliability of the pipeline system has always been a primary goal for the Company with design, construction, operations and maintenance activities performed in compliance with, or exceedance of, state and federal gas safety codes. While the replacement of infrastructure will be accelerated, the Company's risk-based approach to project prioritization will remain. National Fuel's current and future methodology for accelerated replacement is to focus the available capital budget on the highest risk projects system wide to ensure the greatest risk reduction per dollar spent.

Acceleration

National Fuel will accelerate LPP replacement beginning in 2023 with 48 miles of replacement, a 6.7 mile increase from the prior 5-year average (2017 to 2021). As seen in Figure 3 below, proposed replacements will continue to increase through 2027 up to 57

miles. This equates to a 38% acceleration in the replacement of LPP. This increased replacement will further reduce the risk on the system, improve service to customers and increase system reliability.

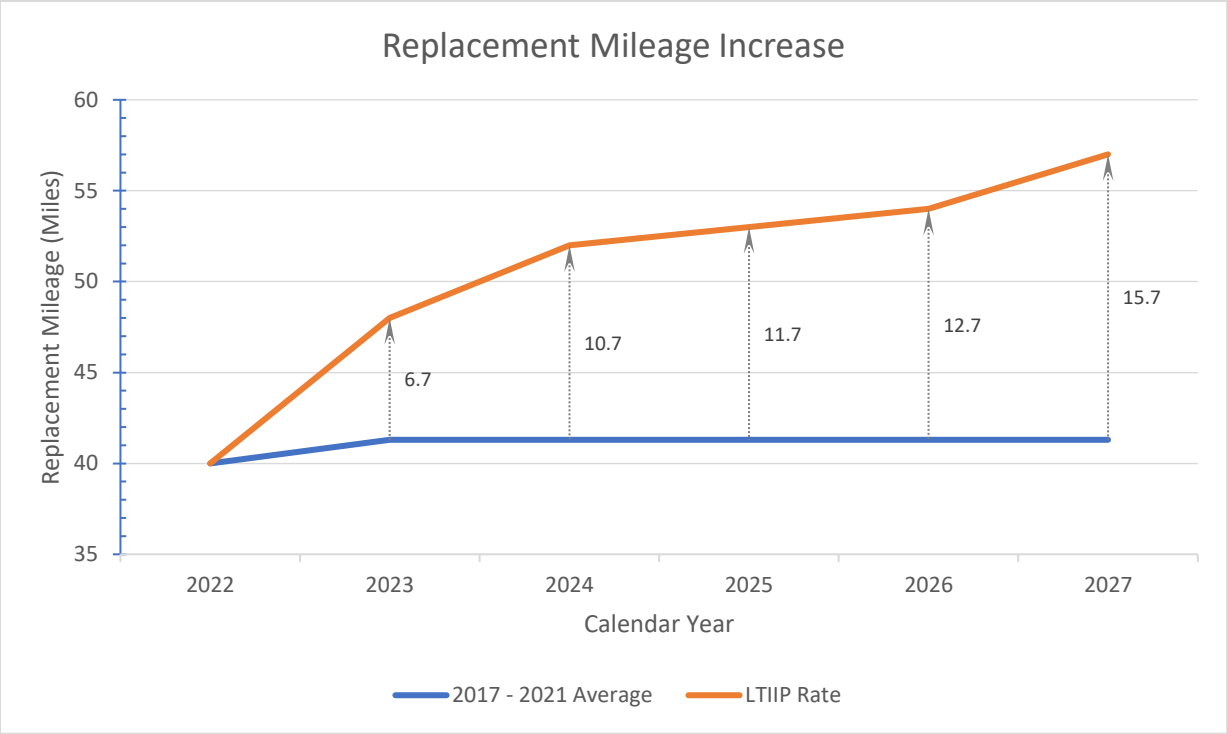

Figure 3: Replacement Mileage Increase

The Company will accelerate its capital expenditures related to the modernization of pipelines (including mainline and services), M&R stations, cathodic protection, associated costs for land/land rights, and supporting software for the fiscal years of 2023 through 2027 to fund increased infrastructure replacements. Starting in 2023, proposed annual modernization spending will rise to $37.2MM. This represents a $13.4MM increase from the previous 5-year annual average of $23.8MM. A large component of this spending will go towards accelerated replacement of transmission and high-pressure

mains over 124 psi. Figure 4 shows the capital investments continuing to increase under the Amended LTIIP. In 2027, the Company expects to spend ~~$45.8MM~~ $66.5MM which is 179% higher than the previous 5-year annual average.

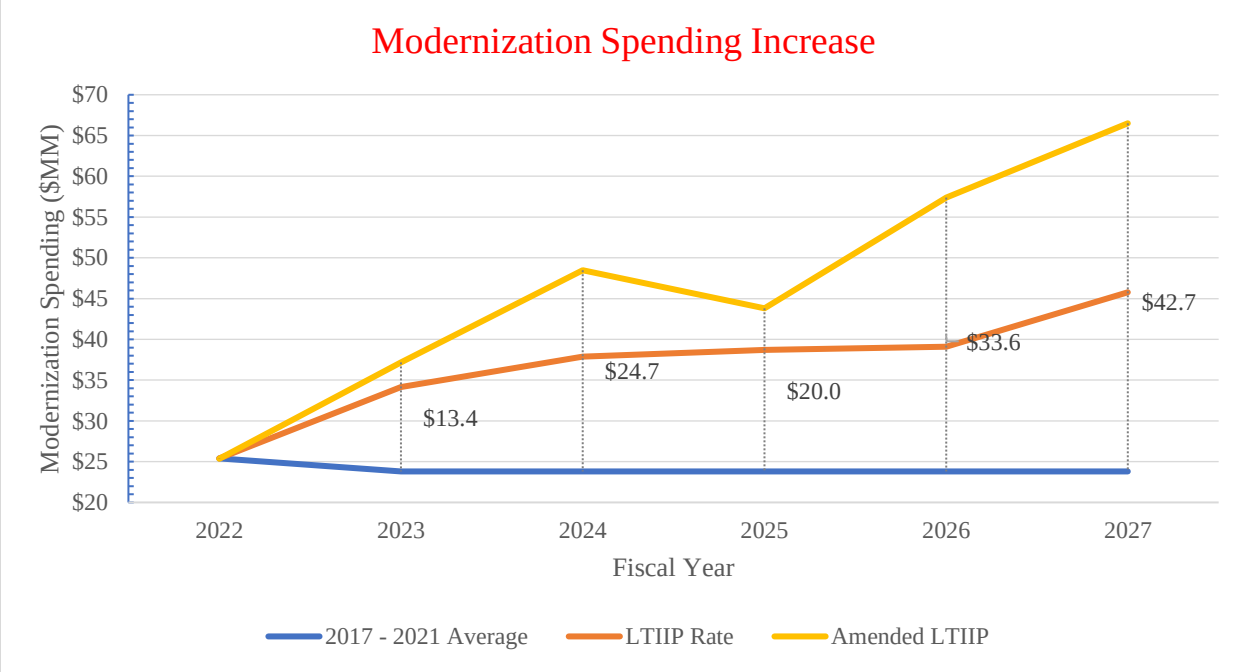

Figure 4: Modernization Spending Increase

Table 14 shows the proposed replacement mileage and modernization spending for the 5 years covered under the LTIIP compared with the ~~previous~~ 5-year period between 2017-2021. As shown in the table, this acceleration results in a 27.8% increase in replacement miles and a 114.7% increase in modernization spending on average per year.

Table 14: Average Replacement and Investment Acceleration

	2017 - 2021 Average	LTIIP Average	% Increase
Replacement Mileage (miles)	41.3 miles	52.8 miles	27.8 %
Modernization Spending ($MM)	$23.8 MM	$50.7MM	112.9%

Safety

Safety is a guiding principle and top priority at National Fuel. National Fuel is committed to promoting and practicing a positive safety culture in all phases of the business. All employees, as well as contractors and suppliers providing services to National Fuel, are expected to place the highest priority on employee, customer, public and pipeline safety. The Company is fully committed to using the best tools, practices, and available data to enhance distribution pipeline safety and reduce risk on our system.

Public safety is of primary importance when considering pipeline replacement projects. Immediate safety concerns requiring pipe replacement are given top priority. In addition to addressing immediate safety concerns, pipeline replacement projects are identified to:

- Reduce risk
- Ensure system reliability
- Reduce leaks and greenhouse gas emissions
- Minimize unfeasible O&M repairs that are no longer cost effective or cause an undue inconvenience to customers

- Relocate facilities due to highway and municipal infrastructure improvement projects
- Reduce the risk of excavation damage

Figure 5 shows the total number of reported leaks per year by type. The total number of leaks is comprised of Type 1, Type 2, and Type 3 leaks. A Type 1 leak is a gas leak which, due to its location and/or relative magnitude, imposes a potentially hazardous condition upon the public or buildings. Type 1 leaks require an immediate response to protect life and property. From the figure, it can be seen that reported Type 1 leaks have decreased by 15% between 2017 and 2021. A Type 2 leak is a gas leak that does not present an immediately hazardous condition to the public or buildings but is of a nature requiring scheduled repair. Type 2 leaks shall be repaired within a period not to exceed 12 months. As can be seen in Figure 5, reported Type 2 leaks have been reduced by 27% since 2017. A Type 3 leak is any leak that is not classified as a Type 1 or a Type 2 leak. Type 3 leaks have decreased by 33% since 2017. The clear reduction in reported leaks can be attributed to the Company's risk-based SMP. National Fuel expects that with an acceleration in replacement, a coinciding decrease in reported leaks will follow.

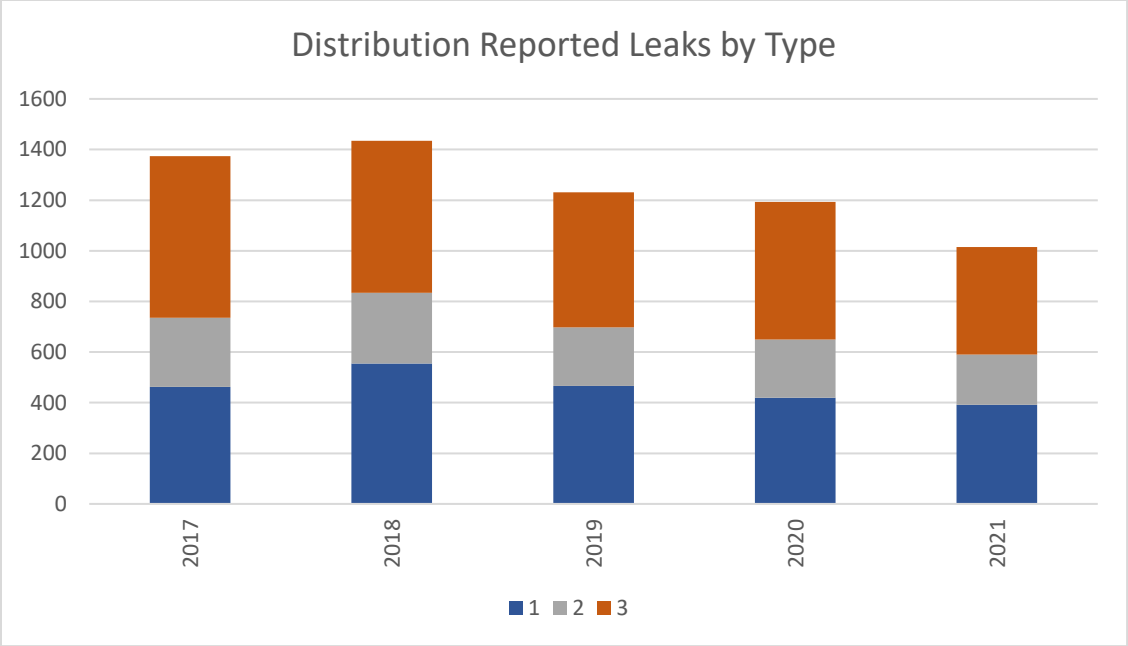

Figure 5: Distribution Reported Leaks by Type

The American Petroleum Institute (API) developed a safety management system standard specific to the pipeline industry. A Safety Management System (SMS) provides a systematic approach to managing safety, including the processes, policies, and procedures an organization uses to direct and control its activities. Stakeholders from across the pipeline industry including operators, regulators, industry trade associations and safety experts representing the public collaborated in the development of API Recommended Practice (RP) 1173 on Pipeline Safety Management Systems (PSMS).

In 2019, the Company, along with AGA membership, committed to implementing an API RP 1173 compliant PSMS within three years. The Company first performed a gap analysis evaluating alignment of existing programs and procedures with API RP 1173 requirements, followed by the ongoing development of a web-based SMS to support our PSMS implementation. SMS development commenced in 2021 with a team of internal

subject matter experts from a variety of functional areas working collaboratively with our SMS vendor. Modules focusing on corrective and preventative actions as well as surveys and inspections were developed first and will be followed by subsequent modules which will enable us to:

- Enhance inspections and observations of work activities to validate compliance with safety and work procedures
- Enhance safety event reporting including incidents, near misses and safety observations by employees and contractor personnel
- Facilitate root cause analysis and implementation of lessons learned from within our Company and our industry
- Track and report key performance indicators across all pipeline and employee safety programs
- Manage change throughout the organization using standardized workflows and action tracking
- Facilitate two-way safety communications with front line company and contractor personnel.

7. A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner.

To ensure that the Company can safely, reliably, and economically implement accelerated infrastructure improvement as described in this LTIIP, National Fuel will continue to utilize a trained and qualified workforce. Operating a safe and reliable pipeline system for our customers, employees and the public is our highest priority. National Fuel's system modernization work has and will continue to be completed by trained and qualified construction crews. This includes in-house crews, blanket contractor crews working under established unit price contracts, and bid contractor crews. By using a mix of in-house and contractor personnel, the Company can efficiently and cost effectively complete projects by using the appropriate resource.

Workforce Management

National Fuel consistently onboards new contractors to meet increasing infrastructure replacement mileage. Certain criteria are reviewed to ensure the highest quality contractors are performing work for the Company. These include, but are not limited to:

- Safety History (Injury and Illness Statistics, OSHA Citations, and Safety Programs)
- Drug and alcohol Compliance
- Criminal Background Checks
- Industry Referrals
- Financial Health

The Company regularly evaluates contractors' performance after each job for several metrics including:

- Job Safety
- Customer Sensitivity
- Construction
- Documentation
- Property Restoration
- Project Schedule

National Fuel Quality Assurance (QA) auditors, along with local Operations supervision, will perform field assessments to ensure the continued competency of an individual to perform a Covered Task(s) or Subtask(s). Should an individual's competency be in question there is a deficiency review process in place which will allow for the suspension of an individual's qualification for a Covered Task(s) or Subtask(s) pending further investigation.

Training and Operator Qualification Compliance Program

All in-house and contractor personnel performing work on pipeline facilities are required to undergo an extensive training and qualification program before working on any National Fuel pipeline facilities. Regular requalification with set intervals for the specific task is required to be maintained thereafter. Training and qualifications are completed through both classroom and hands-on training. National Fuel offers a multi-part training program which covers over 60 tasks:

- Basic Properties of Natural Gas
- Plastic Pipe Fusion / Mechanical Joining
- Construction Relight
- Corrosion / Purging
- Stopping / Tapping
- Leak Investigation / Leak Survey
- Customer Service

The U.S. Department of Transportation PHMSA regulations require operators to develop and maintain a written qualification program for individuals performing Covered Tasks. These regulations are detailed in Title 49 CFR 192, Subpart N: Qualification of Pipeline Personnel and are commonly known as Operator Qualification (OQ). The regulations are intended to promote safety and minimize human error by having qualified personnel who can perform work tasks safely and recognize and react to abnormal operating conditions.

Other than the prescriptive specifications for determining a Covered Task, the rule is performance based in that the operator has flexibility in the administration, application, and modification of the written operator qualification plan. Therefore, operators can establish appropriate guidelines that are specific to the operator's policies and procedures. The Operator Qualification Compliance Program Written Plan (Written Plan) was developed by the National Fuel Quality Assurance Department in conjunction with National Fuel Operations subject matter experts. This Written Plan can be found in Appendix A.

The Written Plan addresses the following aspects of the OQ Program: guidelines for identifying Covered Tasks; establishing an evaluation process, including intervals for subsequent evaluation and the role of training; utilizing non-qualified individuals in a Covered Task; post-incident evaluation of qualified personnel; re-evaluation of qualified personnel suspected of questionable performance; communication of significant changes to the OQ Program; recordkeeping; mutual assistance; revisions to Covered Tasks; abnormal operating conditions; retaining personnel qualifications during states of emergency and other critical processes.

The Company has implemented procedures to verify that personnel completing tasks on pipelines have current qualifications for the work being performed. Before a contractor bid job begins, OQs are provided by the contractor and verified by the company for any contractor employees working on the project. Blanket contractor OQs are verified through a daily location sheet, provided by the contractor, which lists the employees reporting to each job site. For company personnel, National Fuel Operations supervisors perform regular OQ checks for specific tasks to be performed. National Fuel expects all company and contractor employees to comply with training and OQ requirements to ensure a safe and reliable pipeline system.

8. A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIIP.

Utility Outreach and Coordination

National Fuel has a long-standing and active outreach program coordinating with local municipalities and other utilities on construction projects to minimize duplication of restoration efforts and disruptions to local customers or residents. A listing of municipal projects involving Company facilities is compiled and sent to the Company's Operations group with updates circulated on a regular basis. The status of outstanding projects is reviewed at the Company's yearly Spring and Fall Operations Planning Meetings. By reviewing these projects regularly, the Company ensures that proper planning and scheduling can take place with the third parties.

The Company sends annual letters to all municipalities and highway departments within the Company's service area, requesting information on planned infrastructure improvements. The letter contains a damage prevention message with a list of expected contractor/excavator responsibilities and a typical crossing/open trench detail with requirements when excavating around natural gas lines. See Appendix B for an example of this outreach letter.

In addition, National Fuel's Engineering Department reviews design tickets submitted through the Pennsylvania One-Call center. These notices are provided during the design phase for other utilities or larger construction projects. The purpose is to

attempt to identify and resolve conflicts with existing facilities during the planning stage of a project. Coordination with designers and appropriate scheduling of Company work is evaluated on a case-by-case basis to ensure efficiency during these projects.

National Fuel also sponsors and participates in One-Call awareness sessions conducted by the Pennsylvania One-Call System. National Fuel initiates sessions in areas where additional focus is needed. Sessions include emphasis on the public "call before you dig" message and safe digging around gas lines. The Company is represented on the Board of Directors of the Pennsylvania One-Call System, actively participating in public education, governmental affairs, and the One-Call System governance. In addition, National Fuel supports and/or participates in national, regional, and local committees promoting damage prevention (Common Ground Alliance (CGA), American Gas Association (AGA), Interstate Natural Gas Association of America (INGAA), Northeast Gas Association (NGA), Energy Association of Pennsylvania (EAP), local Damage Prevention Committees (DPCs)).

Public Awareness

The Company's Public Awareness program meets or exceeds the requirements of DOT CFR Part 192 Sections 192.7 and 192.616, – Public Awareness, and DOT CFR Part 192.111M Subpart O – Pipeline Integrity Management. National Fuel conducted a benchmark evaluation of its Public Awareness program in 2007. Subsequent effectiveness evaluations were conducted in 2011, 2014, 2018 and 2022. The study includes surveys of affected public, public officials, Emergency Management Service (EMS) officials, and excavators within the Company's service territory. The survey was designed to provide

input on gas pipeline safety including overall gas pipeline awareness, perceptions, attitudes, knowledge understanding behavior and gas safety program awareness.

National Fuel engages in, and facilitates, numerous public awareness and outreach programs. This is completed through advertising, public relations, Company website, community relations, and customer communications. Yearly communications on relevant safety topics are distributed to local stakeholders, including municipalities and contractors. These topics include, but are not limited to, cross bore infographics and letters, meter safety flyers, and emergency response letters detailing training opportunities. The Company also participates in local public relations activities which utilize press releases, social media postings, and local advertising (digital, radio, TV, and billboard) to increase awareness of pipeline activities and safety. National Fuel personnel participate annually in pipeline safety meetings conducted by Paradigm for the benefit of excavators and emergency responders. National Fuel also coordinates emergency responder trainings which are held at various Police and Fire Stations.

The extensive variety of public outreach and regional coordination undertaken by National Fuel has historically and will continue to ensure that Company facilities are operated in a safe and reliable manner. These activities are essential to the ongoing efforts to reduce the Company's inventory of LPP and increase system safety.

ATTACHMENT 2

National Fuel Gas Distribution Corporation

Amended Long Term Infrastructure Improvement Plan

December 11, 2025

Table of Contents

National Fuel Gas Distribution Corporation

Amended Long-Term Infrastructure Improvement Plan

I. Introduction

In compliance with requirements of 66 Pa. C.S. § 1352(a) and the Commission's regulations, 52 Pa. Code § 121.1 *et. seq*.), National Fuel Gas Distribution Corporation ("National Fuel", "Distribution", or the "Company") respectfully submits its Long-Term Infrastructure Improvement Plan ("LTIIP" or "Plan") covering the period of 2023 through 2027 with the Pennsylvania Public Utility Commission (the "Commission").

The LTIIP shall guide the Company's accelerated repair and replacement of its distribution system in its Pennsylvania service territory. As detailed here within the plan, the Company provides information in response to the Commission's eight required elements.

II. Background

Headquartered in Williamsville, New York, National Fuel delivers natural gas to more than 749,000 residential, commercial, and industrial customers in Western New York and Northwest Pennsylvania through its nearly 14,825 mile pipeline system. Specifically in Pennsylvania, approximately 215,000 customers are served through 4,917 miles of pipeline.

III. LTIIP Requirements

1. Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.

- Gas Distribution and Transmission Mains, Valves, Fittings, Couplings, and Appurtenances
- Gas Service Lines, Excess Flow Valves (EFVs), Curb Valves, Meter Sets, Risers, Meter Bars, Meters, and Appurtenances
- City Gate Stations, District Regulator Stations, Production Stations, Telemetry, Overpressure Protection, and Regulator Station Appurtenances
- Farm Taps
- System Reliability Improvements
- Vintage Plastic Replacements
- Mandated Facility Relocations due to highway/city/township/municipal projects (unreimbursed costs)
- Other Related Capitalized Costs – Equipment, Tools, Corrosion Control Equipment, Vehicles, Supporting Information Technology, and Appurtenances

National Fuel's plan to upgrade this eligible property within the pipeline system will help to maintain safe and adequate service while containing operations and maintenance costs. The Company will continue to employ a risk-based system modernization process to continue delivering safe and reliable natural gas service to its approximately 215,000 residential, commercial, and industrial customers in Northwestern Pennsylvania.

Gas Distribution and Transmission Mains, Valves, Fittings, and Couplings

National Fuel's distribution and transmission mainlines have been installed over multiple decades and are comprised of many different types of materials including Unprotected Bare Steel, Unprotected Coated Steel, Protected Bare Steel, Protected Coated Steel, Wrought Iron, and Plastic. Table 1 below shows the location of eligible distribution mainline in each of National Fuel's Responsibility Centers (RCs) / Operating Areas categorized by pipeline material.

Table 1: National Fuel's Location of Eligible Property – Distribution Main[1]

Miles of Distribution Main as of December 31st, 2021								
Responsibility Center (RC)	**Unprotected Bare Steel**	**Unprotected Coated Steel**	**Protected Bare Steel**	**Protected Coated Steel**	**Wrought Iron**	**Plastic**	**Other**	**Total**
RC311 Erie	201.5	2.4	0.0	118.7	5.4	681.2	0.6	1,009.8
RC312 West County	91.1	0.0	10.1	90.6	0.7	286.8	0.0	479.3
RC314 Warren	26.4	0.0	0.0	57.5	5.3	214.7	0.0	303.9
RC317 Corry	22.3	0.0	0.0	17.4	0.9	76.8	0.0	117.5
RC323 Bradford	9.1	0.0	0.0	46.0	6.6	142.3	0.0	204.0
RC326 Clarion	27.3	0.1	0.0	28.4	10.5	123.0	0.0	189.2
RC327 Chicora	2.2	0.0	4.8	36.6	5.6	126.3	0.0	175.5
RC329 Dubois	23.4	0.0	0.0	76.4	6.4	190.3	0.0	296.5
RC332 Elk	28.3	0.4	2.7	71.6	8.9	248.9	0.0	360.9
RC344 Meadville	60.5	0.0	46.2	90.5	9.6	262.4	0.0	469.3
RC347 Oil City	82.1	0.0	20.1	69.3	46.9	339.4	0.0	557.8
RC350 Sharon	137.0	0.7	0.1	143.3	20.9	384.7	0.0	686.6
Total	711.1	3.7	84.1	846.3	127.8	3,076.8	0.6	4,850.4

[1] **Due to rounding, values shown in Tables 1 through 4 may differ slightly from Annual DOT Reporting**

National Fuel's existing distribution mainline assets as of December 31, 2021 consist of unprotected bare steel (~15%), unprotected coated steel (< 1%), protected bare steel (~2%), protected coated steel (~17%), wrought iron (~3%), plastic pipeline (~63%), and a small portion of other (epoxy fiberglass) main (< 1%). Table 2 below shows the age profile of eligible distribution mainline throughout National Fuel's territory.

Table 2: National Fuel's Age Profile of Eligible Property – Distribution Main[1]

Age Profile of Distribution Main as of December 31st, 2021	
Decade of Installation	**Miles**
Pre-1940	341.4
1940's	85.8
1950's	360.9
1960's	603.2
1970's	694.6
1980's	820.2
1990's	801.4
2000's	495.1
2010's	470.8
2020's	77.4
Unknown	99.7
Total	4,850.4

Nearly 29%, or 1,391 miles, of National Fuel's existing distribution mainlines, as of December 31, 2021, is comprised of pipelines installed prior to 1970. National Fuel does not replace pipeline strictly based on the age of the facility; however, older pipeline is generally comprised of vintage material which is a factor considered in the Company's risk model and System Modernization Program (SMP). Distribution main is considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(i), 1351(2)(ii), and 1351(2)(iv).

Table 3 below shows the location of eligible transmission main in each of National Fuel's Responsibility Centers sorted by pipeline material.

Table 3: National Fuel's Location of Eligible Property – Transmission Main[1]

Miles of Transmission Main as of December 31st, 2021			
Responsibility Center (RC)	**Protected Bare Steel**	**Protected Coated Steel**	**Total**
RC311 Erie	0.0	3.6	3.6
RC312 West County	20.3	7.8	28.0
RC314 Warren	0	0	0
RC317 Corry	2.3	0.0	2.3
RC323 Bradford	0	0	0
RC326 Clarion	0	0	0
RC327 Chicora	0	0	0
RC329 Dubois	0	0	0
RC332 Elk	0	0	0
RC344 Meadville	3.6	2.1	5.7
RC347 Oil City	11.1	15.7	26.8
RC350 Sharon	0	0	0
Total	37.3	29.2	66.4

National Fuel's existing transmission main, as of December 31, 2021, consists of protected bare steel (~56%) and protected coated steel (~44%). Table 4 below shows the age profile of eligible transmission main throughout National Fuel's territory.

Table 4: National Fuel's Age Profile of Eligible Property – Transmission Main[1]

Age Profile of Transmission Main as of December 31st, 2021	
Decade of Installation	**Miles**
Pre-1950	0.0
1950's	37.1
1960's	8.3
1970's	0.1
1980's	7.4
1990's	7.4
2000's	0.3
2010's	3.8
2020's	2.0
Total	66.4

Approximately 68%, or 45 miles, of National Fuel's existing transmission main, as of December 31, 2021, is comprised of pipeline installed prior to 1970. Like distribution main, National Fuel does not replace pipeline strictly based on the age of the facility, however older transmission main is typically comprised of bare steel which is a factor considered in the Company's risk model and SMP. Transmission main is considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(i), 1351(2)(ii), and 1351(2)(iv).

Gas Service Lines, Excess Flow Valves (EFVs), Curb Valves, Meter Sets, Risers, Meter Bars, Meters, and Appurtenances

National Fuel's service lines are distribution lines that transport gas from a common source of supply to an individual customer, to two adjacent or adjoining residential or small commercial customers, or to multiple residential or small commercial customers served through a meter header or manifold. A service line ends at the outlet

of the customer meter or at the connection to a customer's piping, whichever is further downstream. National Fuel owns all of the service lines in its service territory.

EFVs and/or curb valves may be installed on newer gas service lines directly downstream of the mainline tap as a safety measure in the event of service line damage. The EFV will automatically prevent gas from flowing through the service line if there is a failure of the service between the mainline and meter. When the gas flow through the EFV exceeds a designated rate, the valve automatically closes and stops all, or a major portion, of the gas flow.

Curb valves allow National Fuel to isolate the service line completely from the source of gas in the event of failure on the service line. Other eligible property included on National Fuel's service lines includes, but is not limited to, line taps, risers, meter bars, meters, and meter set piping. National Fuel owns and operates 193,636 service lines as of December 31, 2021, as shown in Table 5 below.

Table 5: National Fuel's Location of Eligible Property – Service Lines

Service Lines by Material as of December 31st, 2021				
Responsibility Center (RC)	**Bare Steel**	**Coated Steel**	**Plastic**	**Total**
RC311 Erie	5,353	671	56,747	62,771
RC312 West County	373	929	16,325	17,627
RC314 Warren	908	277	8,719	9,904
RC317 Corry	208	184	4,420	4,812
RC323 Bradford	172	144	5,308	5,624
RC326 Clarion	679	470	5,426	6,575
RC327 Chicora	102	145	2,943	3,190
RC329 Dubois	706	434	9,868	11,008
RC332 Elk	808	187	11,575	12,570
RC344 Meadville	1,654	855	12,491	15,000
RC347 Oil City	2,156	731	14,445	17,332
RC350 Sharon	3,752	1,337	22,134	27,223
Total	16,871	6,364	170,401	193,636

National Fuel's existing services, as of December 31, 2021, were comprised of 8.7% bare steel pipeline, 3.3% coated steel pipeline, and 88% plastic pipeline. The majority of existing services are comprised of plastic or bare steel. The bare steel pipeline services are considered early vintage material and as a result have a higher risk factor when evaluating replacement projects. Table 6 below shows the age profile of eligible service lines throughout National Fuel's territory.

Table 6: National Fuel's Age Profile of Eligible Property – Service Lines

Age Profile of Service Lines as of December 31st, 2021	
Decade of Installation	**Number of Services**
Pre-1940	6,036
1940's	1,808
1950's	4,873
1960's	7,789
1970's	26,853
1980's	34,755
1990's	40,717
2000's	34,440
2010's	30,013
2020's	6,339
Unknown	13
Total	193,636

Gas services are not replaced based strictly on material or age; however, the service line material and age are factors considered in the Company's SMP, with all associated bare steel services being replaced in connection with main replacement. Gas service lines, insulated and non-insulated fittings, valves, excess flow valves, risers, meter bars, and meters are considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(iii), 1351(2)(iv), 1351(2)(v), 1351(2)(vi), 1351(2)(vii), and 1351(2)(viii).

City Gate Stations, District Regulator Stations, Production Stations, Telemetry, Overpressure Protection, and Measurement Stations

National Fuel owns and operates 875 meter and regulator (M&R) stations as of December 31, 2021. Table 7 below shows the breakdown of regulator stations throughout National Fuel's territory.

Table 7: National Fuel's Location of Eligible Property – M&R Stations

M&R Stations as of December 31st, 2021	
Responsibility Center (RC)	**Regulator Stations**
RC311 Erie	125
RC312 West County	45
RC314 Warren	46
RC317 Corry	14
RC323 Bradford	37
RC326 Clarion	41
RC327 Chicora	27
RC329 Dubois	68
RC332 Elk	74
RC344 Meadville	123
RC347 Oil City	147
RC350 Sharon	128
Total	875

M&R stations are inspected annually to ensure safe and reliable operation. In order to maintain communication with various key stations throughout its distribution system, National Fuel operates and maintains different forms of telemetry and monitoring devices including, but not limited to, Supervisory Control and Data Acquisition (SCADA) and other forms of remote pressure monitoring.

National Fuel transports natural gas from multiple local producers throughout its service area. It is the responsibility of the producer to ensure that gas quality standards specified in National Fuel's tariff are met prior to injection into National Fuel's system. Therefore, the producer typically owns and operates any dehydrators, dryers, filters, separators, and regulation equipment at production stations. National Fuel owns and operates certain equipment downstream of the production regulation equipment, this typically includes, but is not limited to, meters, correctors, valving, odorization equipment, and overpressure protection devices.

Overpressure protection at regulator stations is typically in the form of monitor regulators, control valves, or full capacity relief valves. Immediately following the Merrimack Valley over-pressurization incident in 2018, National Fuel identified worker-monitor stations feeding low-pressure distribution systems without full capacity relief valves throughout its territory and began implementing a plan to upgrade the stations by either installing a full capacity relief valve or retiring stations through system improvements. While monitor regulators are compliant under the Code of Federal Regulations Title 49 Part 192.195 as a form of overpressure protection, National Fuel has and will continue to take steps to upgrade these stations to eliminate the potential common mode of failure presented by worker-monitor stations to protect the distribution system from over-pressurization as outlined in the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. As of September 2, 2022, National Fuel has upgraded 100 of its 162 identified worker-monitor stations feeding low-pressure

distribution systems. Relief valves are considered DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(iv).

Farm Taps

National Fuel defines farm taps as service lines that are directly connected to either a transmission pipeline or regulated gathering pipeline that is not operated as part of a distribution system. National Fuel owns and operates farm taps throughout its service territory. Farm tap equipment includes, but is not limited to, service taps, service lines, risers, regulation equipment, over pressure protection equipment, valving, and meters.

System Reliability Improvements (System Reliability Reports – SRRs)

National Fuel uses SRRs to identify operational concerns resulting from or caused by natural forces, other outside forces, equipment failures, incorrect operations, or other threats to National Fuel's pipeline system, M&R stations, and other pipeline facilities.

Upon discovery of a reliability concern, National Fuel documents and tracks the discovery and nature of the reliability concern as well as the immediate response and proposed long-term corrections. The SRR is received by National Fuel's Integrity Engineering Department and routed throughout Engineering, Operations, and other appropriate departments for determination of potential remediation options. National Fuel has utilized third party experts for assistance in developing remediation options to not only remediate immediate reliability concerns, but also prevent similar occurrences in the future. Once a remediation option has been agreed upon by all appropriate

Company personnel, National Fuel assembles a project team and moves forward with the remediation until completion. In many cases, an essential part of the long-term corrections is to monitor the remediation for a period of time, typically one year, after completion to ensure the system reliability issue has been permanently corrected and the system is safe for future operation. Company personnel review SRRs system-wide on a periodic basis until completion.

National Fuel's SRR identification and tracking process outlined above ensures continuous improvement of pipeline reliability and safety throughout its system.

Vintage Plastic Replacements

As outlined above, more than half of National Fuel's distribution system is comprised of plastic pipeline. Existing fusions and mechanical couplings excavated during the normal course of business are visually inspected for defects or other integrity concerns. When a visually questionable fusion or non-pullout resistant coupling is discovered, it is cut out and submitted to National Fuel's Engineering Department for analysis. Visually questionable fusions (including leaking fusions) and non-pullout resistant couplings are documented and evaluated further for remediation options. The Engineering Department analyzes visually questionable fusions and non-pullout resistant couplings and may recommend accelerated actions. Visually questionable fusions, fusion leaks, non-pullout resistant couplings, and plastic failures are documented and tracked for replacement or patrolling on either National Fuel's Plastic Pipeline Special Survey (PPSS) list or Plastic System Integrity Report (PSIR).

Remediation of fusion leaks and visually questionable fusions or non-pullout resistant couplings includes a review of as-built records to determine the number and possible locations of fusions on the project. Aerial photography is reviewed to determine the proximity of buildings. Based on the records review and the number of fusions on the job, additional fusion or coupling inspections or removal of known remaining fusions or couplings may be directed. Segments are placed on the PSIR and are leak surveyed quarterly until remedial actions are complete. Segments on the PPSS are leak surveyed semi-annually (typically April and October) until the segment is replaced or all known fusions are removed. In addition to quarterly reviews and semi-annual leak surveys, all identified PPSS and PSIR projects are reviewed twice annually at Spring and Fall construction planning meetings held at each responsibility center.

National Fuel's existing plastic pipeline is comprised of a combination of MDPE 2306, MDPE 2406, HDPE 3306, HDPE 3408/4710, and unknown vintage. Table 8 below summarizes National Fuel's plastic pipeline by vintage as of October 1st, 2025.

Table 8: National Fuel's Location of Eligible Property – Plastic Pipeline

Plastic Pipeline by Vintage as of October 1st, 2025	
Vintage	**Miles**
Aldyl A - MDPE 2306 & MDPE 2406	251.7
Orange MDPE 2306	119.0
Black HDPE 3306	0.2
Driscopipe 6500 - MDPE 2406	2.4
Yellow MDPE 2406	808.3
Black HDPE 3408/4710	565.0
Unknown	1543.9
Total	3290.4

The Company categorizes and replaces its unknown plastic pipeline through thorough record reviews as well as opportunistically throughout the course of its construction operations. This two-pronged approach has reduced the overall miles of unknown plastic by over 250 miles between 2022 and 2025, from 1,803 in 2021 to under 1,550 in 2025. The Company recognizes there is additional risk associated with unknown vintage plastic. As such, plastic with an unknown vintage in Company records is defaulted in the Company's Distribution asset risk model to the most conservative grade considering the install year.

National Fuel's vintage plastic identification and tracking process outlined above ensures continuous improvement of pipeline reliability and safety throughout its system.

Mandated Facility Relocations

National Fuel is periodically required to relocate facilities to accommodate highway and other public improvement projects. National Fuel maintains a steady stream of communication with cities, municipalities, townships, and the Department of Transportation within its territory to coordinate projects and relocations to minimize impacts. The Company sends annual letters to all municipalities and highway departments within the Company's service area, requesting information on planned infrastructure improvements (see Appendix B). Mandated facility relocations are either reimbursable or non-reimbursable depending on whether the gas facilities in conflict are located within public or private right-of-way. The unreimbursed portion of these costs is DSIC eligible as defined in 66 Pa. C.S. § 1351(2)(ix).

Other Related Capitalized Costs

The replacement and maintenance of the eligible property listed above typically results in additional costs related to but not limited to equipment, tools, corrosion control equipment, vehicles, and supporting information technology. These related costs are DSIC eligible property as defined in 66 Pa. C.S. § 1351(2)(x).

2. An initial schedule for planned repair and replacement of eligible property

The Company has designed and developed its SMP to identify and prioritize pipeline replacements on a system-wide basis using a comprehensive planning process and planning tools, including its Geographic Information System (GIS) and its Distribution Risk Application. Each Fall, at the conclusion of the annual leak survey cycle, the Company utilizes its GIS to perform a geographic leak analysis of the entire distribution system to identify areas of concentrated leakage. This analysis assigns a risk factor to each area based on the number and grade of leaks. The Company's Engineering and Operations management then review maps of higher priority areas during bi-annual planning meetings held at each operating location, to identify potential pipeline replacement projects for further development. The planning meetings also identify any system reliability concerns and potential conflicts with planned highway and municipal construction work. A review of standing agenda items ensures that all relevant system issues are considered in the Company's SMP for the upcoming construction season.

In addition to the Company's SMP, the Company's Leak Prone Pipe (LPP) Replacement Program is robust and carefully designed to ensure the safety and reliability of its system and to control leakage rates by prioritizing pipeline replacements system-wide. LPP can be defined as pipelines that are more susceptible to leakage based on the material (including bare steel, wrought iron, and historic plastics with known issues), design, or past operating and maintenance history of the pipeline. Since 2016, the Company has made significant and consistent progress in this effort, having eliminated

207 miles of its leak prone bare steel and wrought iron mains and 4,581 of its bare steel services under its SMP. Table 9 below shows the Company's calendar year end mileage of bare steel main, wrought iron main, and bare steel service count ~~over the last five years~~ between 2016 and 2021.

Table 9: Bare Steel and Wrought Iron Mileage & Bare Steel Services (2016-2021)

Bare Steel & Wrought Iron Mileage & Bare Steel Services (2016-2021)		
Year	**CY End Mainline Miles**	**CY End Bare Steel Services**
2016	1,183	21,452
2017	1,103 [2]	20,441
2018	1,065	19,518
2019	1,028	18,581
2020	978	17,758
2021	935	16,871

It is anticipated that the Company will replace approximately 40 miles of distribution bare steel & wrought iron mainline pipe in 2022. Table 10 below provides the total miles of distribution and transmission LPP (bare steel, wrought iron, and historic plastics with known issues) that the Company plans to replace during each year following the filing of its initial LTIIP (2022).

Table 10: Leak Prone Pipe Replacement (2022-2027)

Pennsylvania Leak Prone Pipe Replacement - 5 year plan						
	CY 2022	**CY 2023**	**CY 2024**	**CY 2025**	**CY 2026**	**CY 2027**
LPP Reduction	Miles	Miles	Miles	Miles	Miles	Miles
Distribution < 124 psig	40	44	45	46	47	50
Transmission & High Pressure > 124 psig	0	4	7	7	7	7
Total	40	48	52	53	54	57

The table above shows the Company's initial mileage replacement ramp-up from

[2] **Adjusted for 41.594 miles corrected during 2018 records review; Pipe classified as bare but identified as coated**

40 miles in CY 2022 to 48 miles in CY 2023 (including 44 miles of distribution main and 4 miles of transmission pipe & high pressure main) as well as subsequent acceleration in replacement through 2027. Figure 1 below shows the Company's remaining bare steel and wrought iron at the end of each calendar year between 2022 and 2027. The Company's retirement schedule outlined in Section 2 of this LTIIP will allow for the retirement of all bare steel and wrought iron pipe by 2039.

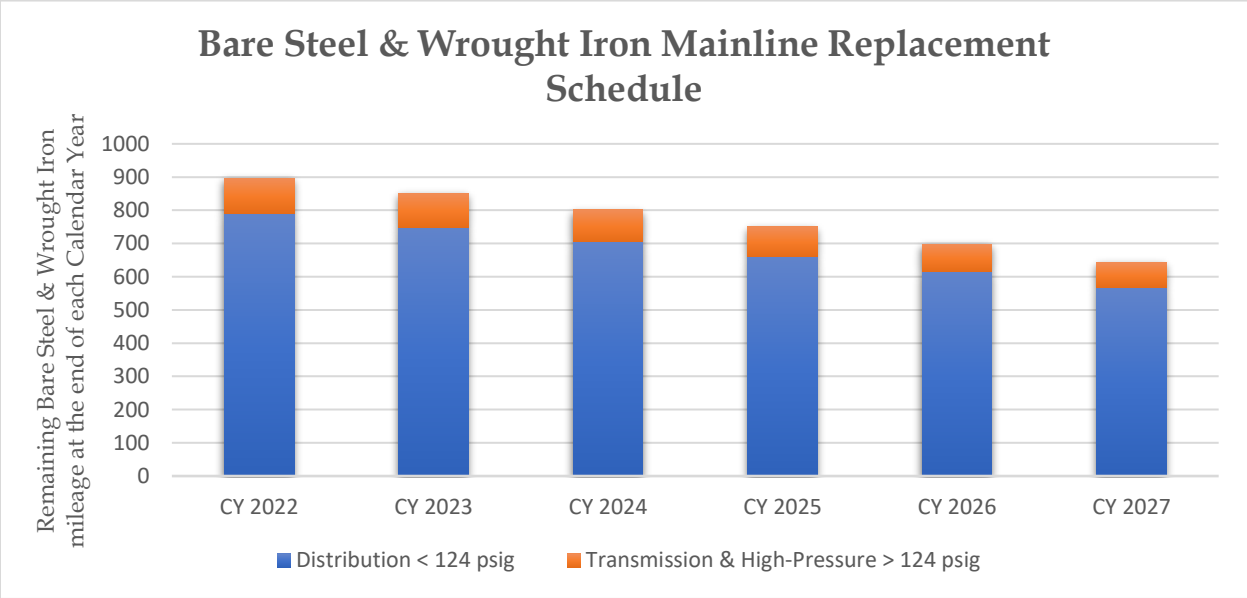

Figure 1: Bare Steel & Wrought Iron Main Replacement Schedule (2022-2027)

The SMP outlined above is consistent with National Fuel's Distribution Integrity Management Program (DIMP) as well as its Transmission Integrity Management Program (TIMP) as defined in Subpart P of 49 C.F.R. Part 192 – Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards. The purpose of National Fuel's DIMP and TIMP is to enhance safety by identifying and mitigating risks to the Company's gas distribution & transmission system.

3. A general description of location of eligible property

National Fuel's eligible property is located throughout its service territory in Northwestern Pennsylvania. This eligible property is located in Armstrong, Butler, Cameron, Clarion, Clearfield, Crawford, Elk, Erie, Forest, Jefferson, McKean, Mercer, Potter, Venango, and Warren Counties. Figure 2 below depicts the location of National Fuel's service territory.

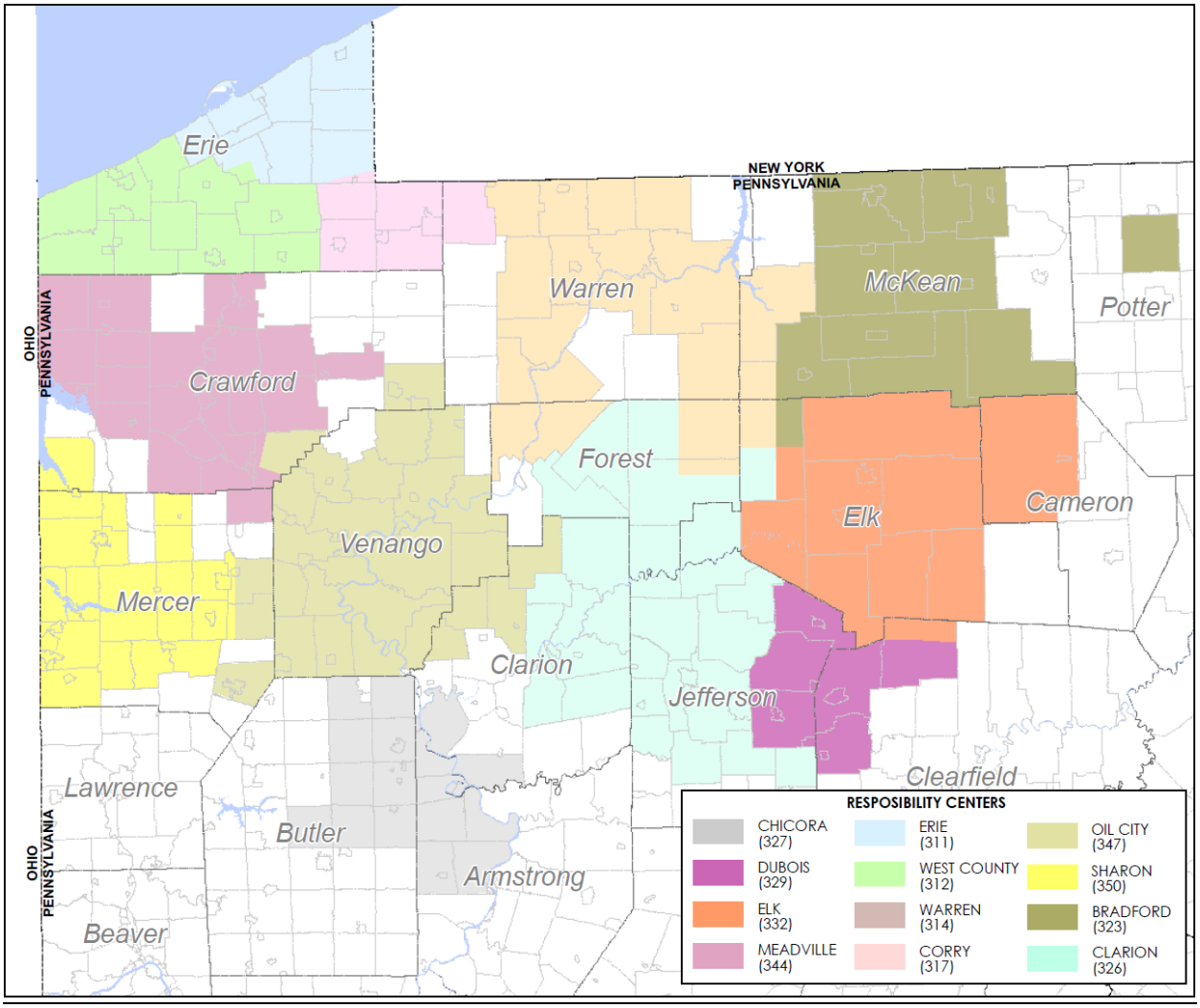

Figure 2: National Fuel's Distribution Service Territory

4. A reasonable estimate of quantity of eligible property to be improved or repaired

The Company expects to replace approximately 40 miles of bare steel and wrought iron main in 2022. The following table shows estimated quantities of eligible property to be improved under this LTIIP. For the next 5 years, the Company anticipates accelerating replacement annually.

Table 11: Estimate of Quantity of Property to be Improved

Eligible Property	2023	2024	2025	2026	2027
Distribution Main (miles)	44	45	46	47	50
HP Distribution / Transmission Main (miles)	4	7	7	7	7
Service Lines and Meter Sets	As part of its pipeline main replacement program, the Company replaces all steel service lines (bare and coated) that are attached to the main being replaced. The Company may also replace plastic service lines during main replacement. This is done to enhance the safety of difficult to locate services, when required to facilitate relocating meters outside (i.e. where the existing service entry will not accommodate an outside meter location), or when the service line is comprised of vintage plastic.				
Meter and Regulator Stations	Replacements, upgrades, and repairs to stations and related equipment as needed to ensure safe and reliable service. Accelerated actions are prescribed based on the likelihood and potential consequences of a future concern.				
Farm Taps	Replacements, upgrades, and repairs to farm taps as needed to ensure safe and reliable service. In some instances, a new main and service will be installed as opposed to replacing the existing taps.				
System Reliability Improvements	Threats to the pipeline in the categories of natural force damage (primarily washouts and exposures), equipment failure, other outside force damage, incorrect operation, gas quality, and other causes to the distribution system.				

Vintage Plastic	Plastic system leaks and reported visually questionable fusions or non-pullout resistant couplings.
Highway and Other Public Improvement Projects	Existing facilities required to be relocated due to conflicts with other utilities or government entities as needed. Coordinate pipeline replacement projects with municipal projects so that the Company may relocate facilities in advance of construction when warranted.
Other Related Capitalized Costs	As needed, invest in equipment, tools, corrosion control, vehicles, and supporting information technology to replace, repair and upgrade the eligible property described in this LTIIP.

5. Projected annual expenditures and means to finance the expenditures

Table 12 below shows the budgeted and actual capital expenditures related to the modernization of pipelines (including mainline and services), M&R stations, cathodic protection, associated costs for land/land rights, and supporting software for the fiscal years of 2017 through 2021. ~~For the past five years, the Company budgeted a total of~~ Total budget for the five-year period between 2017 and 2021 was $118.4MM. During this same period, the Company's actual spending was $118.9MM, resulting in a difference of 0.4%. This negligible difference in budgeted versus actual spending shows the Company's consistent and cost-effective capital execution.

Table 12: Annual Capital Expenditures Related to Modernization

Fiscal Year	Capital Expenditures	
	FY Budget ($MM)	FY Actual ($MM)
2017	$20.0	$19.8
2018	$22.2	$20.5
2019	$24.1	$25.2
2020	$26.4	$24.8
2021	$25.7	$28.7
Total	**$118.4**	**$118.9**

For fiscal year 2022, the Company has budgeted $25.4MM for modernization. Table 13 below provides the projected annual expenditures under this LTIIP. For the years 2023 through 2027, the Company expects to spend approximately ~~$195.6MM~~ $253.3MM related to modernization of pipelines. This forecast represents an increase of

~~65%~~ 113% over the total spending from 2017 to 2021. The proposed budget will increase an average of ~~6.9%~~ 28.4% each year of the LTIIP compared with the prior year.

Table 13: Projected Annual Capital Expenditures Related to Modernization

Fiscal Year	Capital Expenditures
	FY Budget ($MM)
2023	~~$34.1~~ $37.2
2024	~~$37.9~~ $48.5
2025	~~$38.7~~ $43.8
2026	~~$39.1~~ $57.4
2027	~~$45.8~~ $66.5
Total	**~~$195.6~~ $253.3**

The Company finances capital requirements through cash from operations and a mix of short-term and long-term debt provided by its Parent Company, National Fuel Gas Company. The Company's short-term financing is provided through the Parent's Money Pool Agreement and long-term financing is subject to Commission authorization,[3] which currently permits up to ~~$250MM~~ $300MM of additional long-term debt typically issued as intercompany promissory notes tied to the Parent's long-term debt issuances. Cash from operations, in conjunction with our short and long-term financing options, provide ample liquidity to help meet ongoing capital needs.

The Company's philosophy with respect to its SMP was developed to control unit costs, thereby maximizing LPP replacement. In designing pipeline replacement projects, the Company looks to develop larger scope projects with better economies of scale than

[3] **PAPUC Docket ~~S-2020-3020690 - Approved through 12/31/2023~~ S-2023-3041669 Approved through 12/31/2026**

multiple smaller projects. The Company also maximizes medium-pressure replacements to reduce pipe size, which may allow insertion of new medium-pressure mains into the larger low-pressure mains being replaced, thus reducing excavation and restoration costs. Smaller diameter mains have lower unit costs in general, and medium pressure mains may eliminate the need for costly road crossings and tie-ins to establish back feeds that are required in low pressure systems. An additional benefit to expanding the medium pressure system is the relocation of gas meters from inside of homes and businesses to the outside, resulting in easier access for meter reading and less operation and maintenance expense. The Company also looks to maximize project retirement to installation ratios by avoiding cross-country installations and installations across open areas where there are no customers.

In addition to its cost-effective design philosophy, the Company controls costs using multiple qualified contractors and competitive bidding procedures. The Company has a comprehensive contractor administration program which includes standard bid conditions and procedures as well as online bidding and invoicing for efficiency. Contractor invoices submitted for payment undergo multiple levels of review and approval to ensure that quantities invoiced are proper and consistent with bid documents. At the conclusion of bid projects, the Company performs a Post Investment Analysis to compare bid estimates to actual cost and quantities installed. Any significant variances are identified and reviewed with a goal of reducing future variances. Finally,

the Company tracks and reports unit cost trends to executive management in an Annual Unit Cost Study.

6. A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers.

Under this LTIIP, National Fuel will accelerate infrastructure replacement as described in the sections above. The accelerated replacement of aging infrastructure will help maintain safe, reliable, and economic service to customers. As outlined in the Company's DIMP and TIMP, National Fuel will maintain safety by identifying, reducing, and mitigating system integrity risks. Managing the integrity and reliability of the pipeline system has always been a primary goal for the Company with design, construction, operations and maintenance activities performed in compliance with, or exceedance of, state and federal gas safety codes. While the replacement of infrastructure will be accelerated, the Company's risk-based approach to project prioritization will remain. National Fuel's current and future methodology for accelerated replacement is to focus the available capital budget on the highest risk projects system wide to ensure the greatest risk reduction per dollar spent.

Acceleration

National Fuel will accelerate LPP replacement beginning in 2023 with 48 miles of replacement, a 6.7 mile increase from the prior 5-year average (2017 to 2021). As seen in Figure 3 below, proposed replacements will continue to increase through 2027 up to 57

miles. This equates to a 38% acceleration in the replacement of LPP. This increased replacement will further reduce the risk on the system, improve service to customers and increase system reliability.

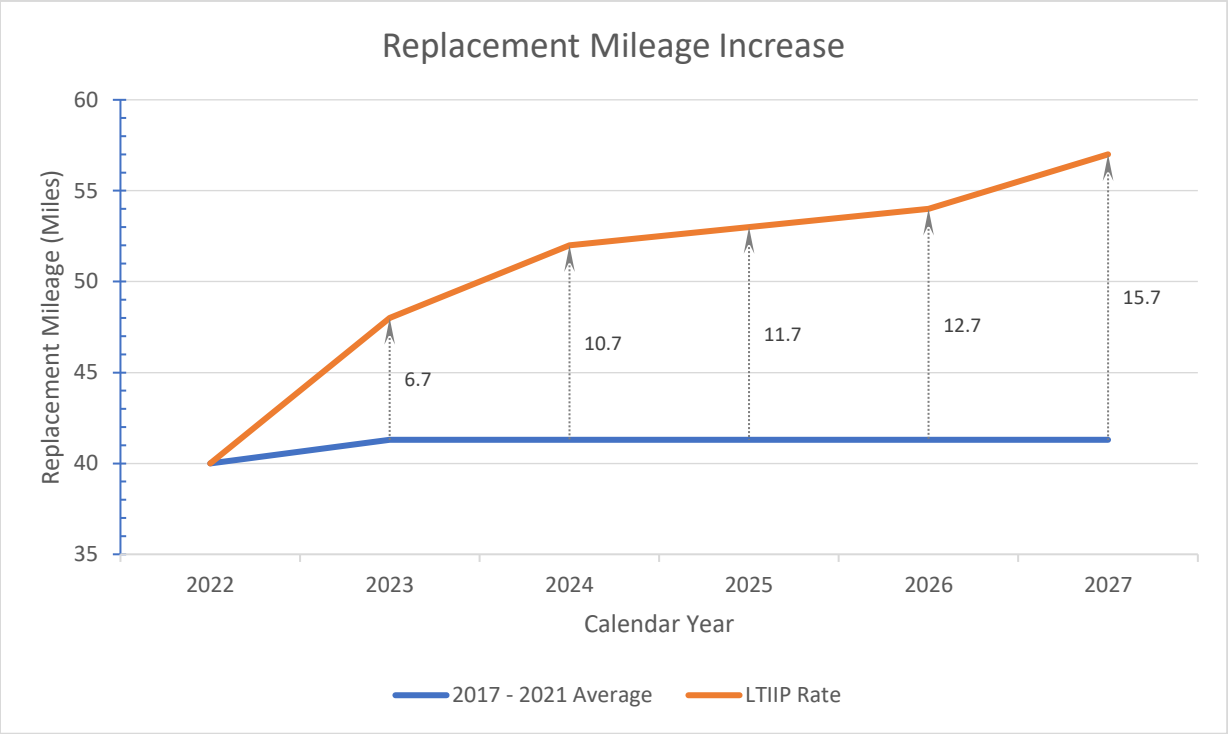

Figure 3: Replacement Mileage Increase

The Company will accelerate its capital expenditures related to the modernization of pipelines (including mainline and services), M&R stations, cathodic protection, associated costs for land/land rights, and supporting software for the fiscal years of 2023 through 2027 to fund increased infrastructure replacements. Starting in 2023, proposed annual modernization spending will rise to ~~$34.1~~ $37.2MM. This represents a ~~$10.3MM~~ $13.4MM increase from the previous 5-year annual average of $23.8MM. A large component of this spending will go towards accelerated replacement of transmission and

high-pressure mains over 124 psi. Figure 4 shows the capital investments continuing to increase under the Amended LTIIP. In 2027, the Company expects to spend ~~$45.8MM~~ $66.5MM which is ~~92%~~ 179% higher than the previous 5-year annual average.

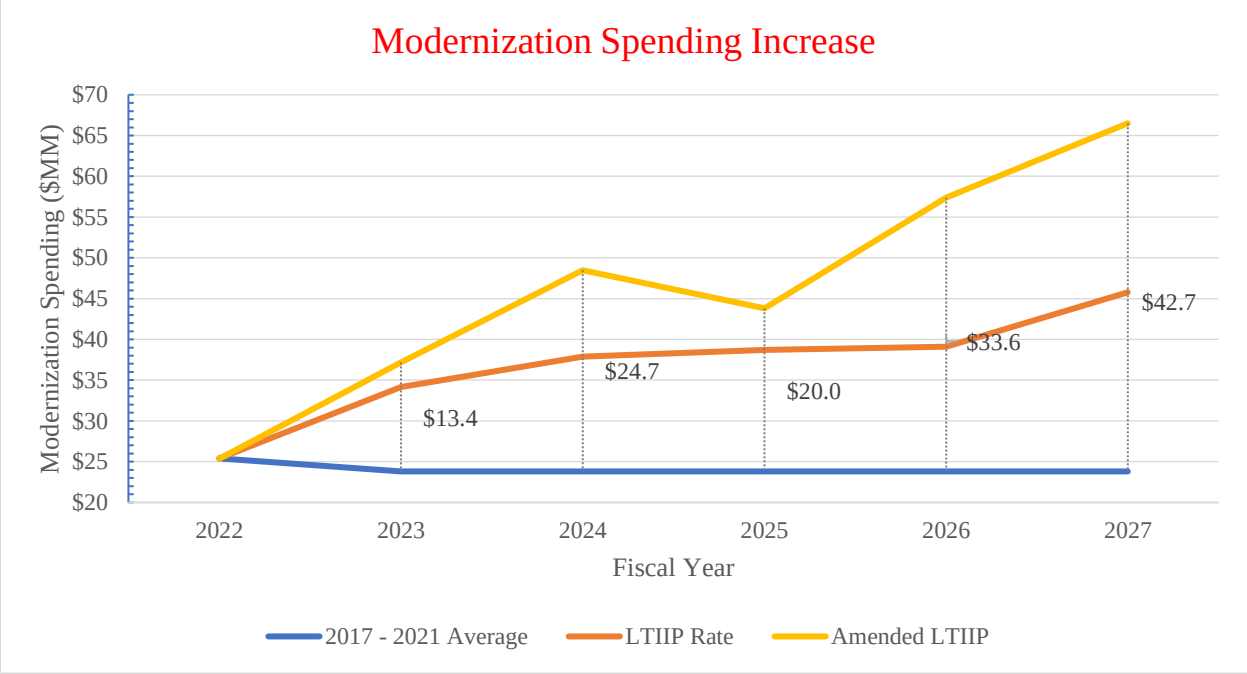

Figure 4: Modernization Spending Increase

Table 14 shows the proposed replacement mileage and modernization spending for the 5 years covered under the LTIIP compared with the ~~previous~~ 5-year period between 2017-2021. As shown in the table, this acceleration results in a 27.8% increase in replacement miles and a ~~64.3%~~ 114.7% increase in modernization spending on average per year.

Table 14: Average Replacement and Investment Acceleration

	2017 - 2021 Average	LTIIP Average	% Increase
Replacement Mileage (miles)	41.3 miles	52.8 miles	27.8 %
Modernization Spending ($MM)	$23.8 MM	~~$39.1 MM~~ $50.7	~~64.3 %~~ 112.9%

Safety

Safety is a guiding principle and top priority at National Fuel. National Fuel is committed to promoting and practicing a positive safety culture in all phases of the business. All employees, as well as contractors and suppliers providing services to National Fuel, are expected to place the highest priority on employee, customer, public and pipeline safety. The Company is fully committed to using the best tools, practices, and available data to enhance distribution pipeline safety and reduce risk on our system.

Public safety is of primary importance when considering pipeline replacement projects. Immediate safety concerns requiring pipe replacement are given top priority. In addition to addressing immediate safety concerns, pipeline replacement projects are identified to:

- Reduce risk
- Ensure system reliability
- Reduce leaks and greenhouse gas emissions
- Minimize unfeasible O&M repairs that are no longer cost effective or cause an undue inconvenience to customers

- Relocate facilities due to highway and municipal infrastructure improvement projects
- Reduce the risk of excavation damage

Figure 5 shows the total number of reported leaks per year by type. The total number of leaks is comprised of Type 1, Type 2, and Type 3 leaks. A Type 1 leak is a gas leak which, due to its location and/or relative magnitude, imposes a potentially hazardous condition upon the public or buildings. Type 1 leaks require an immediate response to protect life and property. From the figure, it can be seen that reported Type 1 leaks have decreased by 15% between 2017 and 2021. A Type 2 leak is a gas leak that does not present an immediately hazardous condition to the public or buildings but is of a nature requiring scheduled repair. Type 2 leaks shall be repaired within a period not to exceed 12 months. As can be seen in Figure 5, reported Type 2 leaks have been reduced by 27% since 2017. A Type 3 leak is any leak that is not classified as a Type 1 or a Type 2 leak. Type 3 leaks have decreased by 33% since 2017. The clear reduction in reported leaks can be attributed to the Company's risk-based SMP. National Fuel expects that with an acceleration in replacement, a coinciding decrease in reported leaks will follow.

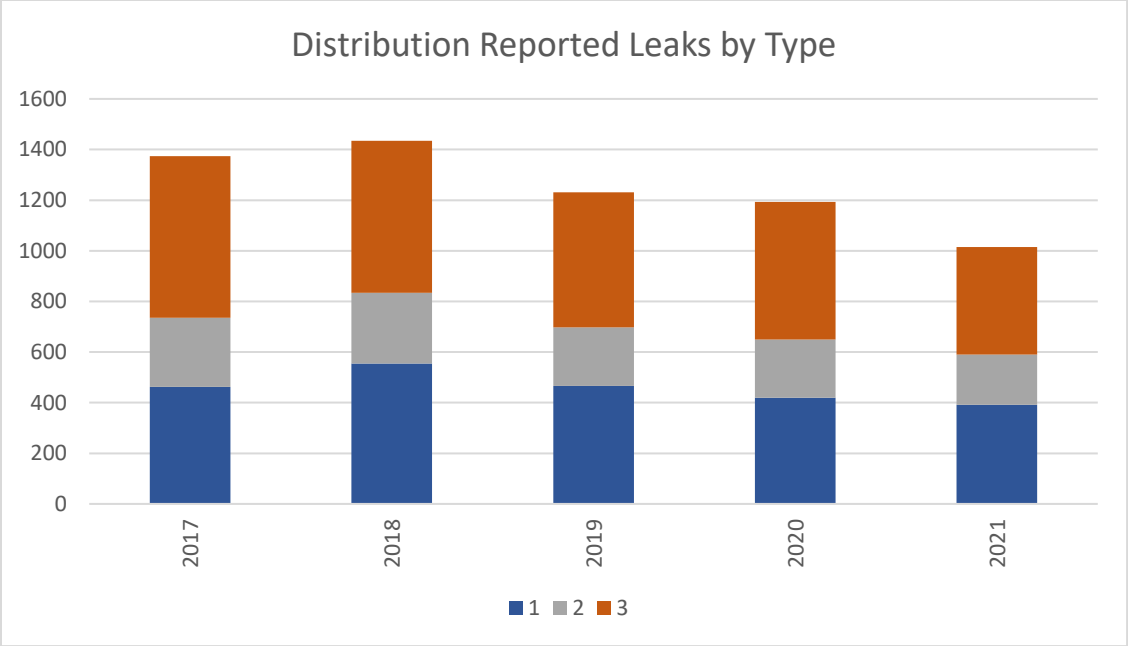

Figure 5: Distribution Reported Leaks by Type

The American Petroleum Institute (API) developed a safety management system standard specific to the pipeline industry. A Safety Management System (SMS) provides a systematic approach to managing safety, including the processes, policies, and procedures an organization uses to direct and control its activities. Stakeholders from across the pipeline industry including operators, regulators, industry trade associations and safety experts representing the public collaborated in the development of API Recommended Practice (RP) 1173 on Pipeline Safety Management Systems (PSMS).

In 2019, the Company, along with AGA membership, committed to implementing an API RP 1173 compliant PSMS within three years. The Company first performed a gap analysis evaluating alignment of existing programs and procedures with API RP 1173 requirements, followed by the ongoing development of a web-based SMS to support our PSMS implementation. SMS development commenced in 2021 with a team of internal

subject matter experts from a variety of functional areas working collaboratively with our SMS vendor. Modules focusing on corrective and preventative actions as well as surveys and inspections were developed first and will be followed by subsequent modules which will enable us to:

- Enhance inspections and observations of work activities to validate compliance with safety and work procedures
- Enhance safety event reporting including incidents, near misses and safety observations by employees and contractor personnel
- Facilitate root cause analysis and implementation of lessons learned from within our Company and our industry
- Track and report key performance indicators across all pipeline and employee safety programs
- Manage change throughout the organization using standardized workflows and action tracking
- Facilitate two-way safety communications with front line company and contractor personnel.

7. A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner.

To ensure that the Company can safely, reliably, and economically implement accelerated infrastructure improvement as described in this LTIIP, National Fuel will continue to utilize a trained and qualified workforce. Operating a safe and reliable pipeline system for our customers, employees and the public is our highest priority. National Fuel's system modernization work has and will continue to be completed by trained and qualified construction crews. This includes in-house crews, blanket contractor crews working under established unit price contracts, and bid contractor crews. By using a mix of in-house and contractor personnel, the Company can efficiently and cost effectively complete projects by using the appropriate resource.

Workforce Management

National Fuel consistently onboards new contractors to meet increasing infrastructure replacement mileage. Certain criteria are reviewed to ensure the highest quality contractors are performing work for the Company. These include, but are not limited to:

- Safety History (Injury and Illness Statistics, OSHA Citations, and Safety Programs)
- Drug and alcohol Compliance
- Criminal Background Checks
- Industry Referrals
- Financial Health

The Company regularly evaluates contractors' performance after each job for several metrics including:

- Job Safety
- Customer Sensitivity
- Construction
- Documentation
- Property Restoration
- Project Schedule

National Fuel Quality Assurance (QA) auditors, along with local Operations supervision, will perform field assessments to ensure the continued competency of an individual to perform a Covered Task(s) or Subtask(s). Should an individual's competency be in question there is a deficiency review process in place which will allow for the suspension of an individual's qualification for a Covered Task(s) or Subtask(s) pending further investigation.

Training and Operator Qualification Compliance Program

All in-house and contractor personnel performing work on pipeline facilities are required to undergo an extensive training and qualification program before working on any National Fuel pipeline facilities. Regular requalification with set intervals for the specific task is required to be maintained thereafter. Training and qualifications are completed through both classroom and hands-on training. National Fuel offers a multi-part training program which covers over 60 tasks:

- Basic Properties of Natural Gas
- Plastic Pipe Fusion / Mechanical Joining
- Construction Relight
- Corrosion / Purging
- Stopping / Tapping
- Leak Investigation / Leak Survey
- Customer Service

The U.S. Department of Transportation PHMSA regulations require operators to develop and maintain a written qualification program for individuals performing Covered Tasks. These regulations are detailed in Title 49 CFR 192, Subpart N: Qualification of Pipeline Personnel and are commonly known as Operator Qualification (OQ). The regulations are intended to promote safety and minimize human error by having qualified personnel who can perform work tasks safely and recognize and react to abnormal operating conditions.

Other than the prescriptive specifications for determining a Covered Task, the rule is performance based in that the operator has flexibility in the administration, application, and modification of the written operator qualification plan. Therefore, operators can establish appropriate guidelines that are specific to the operator's policies and procedures. The Operator Qualification Compliance Program Written Plan (Written Plan) was developed by the National Fuel Quality Assurance Department in conjunction with National Fuel Operations subject matter experts. This Written Plan can be found in Appendix A.

The Written Plan addresses the following aspects of the OQ Program: guidelines for identifying Covered Tasks; establishing an evaluation process, including intervals for subsequent evaluation and the role of training; utilizing non-qualified individuals in a Covered Task; post-incident evaluation of qualified personnel; re-evaluation of qualified personnel suspected of questionable performance; communication of significant changes to the OQ Program; recordkeeping; mutual assistance; revisions to Covered Tasks; abnormal operating conditions; retaining personnel qualifications during states of emergency and other critical processes.

The Company has implemented procedures to verify that personnel completing tasks on pipelines have current qualifications for the work being performed. Before a contractor bid job begins, OQs are provided by the contractor and verified by the company for any contractor employees working on the project. Blanket contractor OQs are verified through a daily location sheet, provided by the contractor, which lists the employees reporting to each job site. For company personnel, National Fuel Operations supervisors perform regular OQ checks for specific tasks to be performed. National Fuel expects all company and contractor employees to comply with training and OQ requirements to ensure a safe and reliable pipeline system.

8. A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIIP.

Utility Outreach and Coordination

National Fuel has a long-standing and active outreach program coordinating with local municipalities and other utilities on construction projects to minimize duplication of restoration efforts and disruptions to local customers or residents. A listing of municipal projects involving Company facilities is compiled and sent to the Company's Operations group with updates circulated on a regular basis. The status of outstanding projects is reviewed at the Company's yearly Spring and Fall Operations Planning Meetings. By reviewing these projects regularly, the Company ensures that proper planning and scheduling can take place with the third parties.

The Company sends annual letters to all municipalities and highway departments within the Company's service area, requesting information on planned infrastructure improvements. The letter contains a damage prevention message with a list of expected contractor/excavator responsibilities and a typical crossing/open trench detail with requirements when excavating around natural gas lines. See Appendix B for an example of this outreach letter.

In addition, National Fuel's Engineering Department reviews design tickets submitted through the Pennsylvania One-Call center. These notices are provided during the design phase for other utilities or larger construction projects. The purpose is to

attempt to identify and resolve conflicts with existing facilities during the planning stage of a project. Coordination with designers and appropriate scheduling of Company work is evaluated on a case-by-case basis to ensure efficiency during these projects.

National Fuel also sponsors and participates in One-Call awareness sessions conducted by the Pennsylvania One-Call System. National Fuel initiates sessions in areas where additional focus is needed. Sessions include emphasis on the public "call before you dig" message and safe digging around gas lines. The Company is represented on the Board of Directors of the Pennsylvania One-Call System, actively participating in public education, governmental affairs, and the One-Call System governance. In addition, National Fuel supports and/or participates in national, regional, and local committees promoting damage prevention (Common Ground Alliance (CGA), American Gas Association (AGA), Interstate Natural Gas Association of America (INGAA), Northeast Gas Association (NGA), Energy Association of Pennsylvania (EAP), local Damage Prevention Committees (DPCs)).

Public Awareness

The Company's Public Awareness program meets or exceeds the requirements of DOT CFR Part 192 Sections 192.7 and 192.616, – Public Awareness, and DOT CFR Part 192.111M Subpart O – Pipeline Integrity Management. National Fuel conducted a benchmark evaluation of its Public Awareness program in 2007. Subsequent effectiveness evaluations were conducted in 2011, 2014, 2018 and 2022. The study includes surveys of affected public, public officials, Emergency Management Service (EMS) officials, and excavators within the Company's service territory. The survey was designed to provide

input on gas pipeline safety including overall gas pipeline awareness, perceptions, attitudes, knowledge understanding behavior and gas safety program awareness.

National Fuel engages in, and facilitates, numerous public awareness and outreach programs. This is completed through advertising, public relations, Company website, community relations, and customer communications. Yearly communications on relevant safety topics are distributed to local stakeholders, including municipalities and contractors. These topics include, but are not limited to, cross bore infographics and letters, meter safety flyers, and emergency response letters detailing training opportunities. The Company also participates in local public relations activities which utilize press releases, social media postings, and local advertising (digital, radio, TV, and billboard) to increase awareness of pipeline activities and safety. National Fuel personnel participate annually in pipeline safety meetings conducted by Paradigm for the benefit of excavators and emergency responders. National Fuel also coordinates emergency responder trainings which are held at various Police and Fire Stations.

The extensive variety of public outreach and regional coordination undertaken by National Fuel has historically and will continue to ensure that Company facilities are operated in a safe and reliable manner. These activities are essential to the ongoing efforts to reduce the Company's inventory of LPP and increase system safety.

VERIFICATION

I, Brian Welsch, certify that I am the Vice President of National Fuel Gas Distribution Corporation, and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are based upon my reasonable investigation thereof and/or were provided to me by other individuals and, as such, are true and correct to the best of my knowledge, information and belief, and that National Fuel Gas Distribution Corporation expects to be able to prove the same at any hearing that may be held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: December 11, 2025

DocuSigned by:
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Brian Welsch