



**National Fuel**<sup>®</sup>

Dominick A. Sisinni  
Senior Counsel

January 29, 2026

**VIA UPS OVERNIGHT MAIL**

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
Harrisburg, PA 17120

**Re:** National Fuel Gas Distribution Corporation's ("**National Fuel**" or "**Company**") Confidential Response (the "**Response**") to the Bureau of Technical Utility Services Data Request Dated December 16, 2025 Addressed to Public Utilities Distributing Natural Gas Concerning Plastic Pipe Data – 2025 (the "**Data Request**")  
**Docket No. M-2024-3050313**

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Dear Secretary Homsher:

Enclosed please find National Fuel's response to the above-referenced Data Request. Please note that this filing contains a **Confidential Exhibit NFG-DR-1**. Consequently, due to the confidential nature of the information contained in said Confidential Exhibit NFG-DR-2 and consistent with 52 Pa. Code § 51.13, this filing is being made in both:

- (a) confidential printed version (filed via UPS Overnight), this printed filing should be treated as **confidential** (and is therefore being filed in paper form); and
- (b) public form (filed via the Commission's e-filing system).

Should you have any questions or comments, please do not hesitate to contact me at (814) 871-8177.

Respectfully submitted,

Dominick A. Sisinni

Enclosure

cc: Matt Stewart  
via e-mail: mattstewar@pa.gov

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Replacement of Older Plastic Pipe in Natural Gas Distribution Systems : Docket No. M-2024-3050313  
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**National Fuel Gas Distribution Corporation’s Response to the Bureau of Technical Utility Services Data Request Dated December 16, 2025 Addressed to Public Utilities Distributing Natural Gas Concerning Plastic Pipe Data – 2025**

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**[1] Please compile a catalog of all plastic pipelines and other plastic components contained with your utility’s distribution system. The catalog should include quantities of each component (footage in the case of pipelines, number/quantity in the case of other components), brand of the component and age. We realize this may require multiple different listings or catalogs to provide the requested information.**

**RESPONSE:** National Fuel Gas Distribution Corporation (“National Fuel” or the “Company”) maintains plant and asset records in its property management system, including information regarding its pipeline infrastructure. The Company notes, however, that information regarding older or legacy facilities, such as first-generation plastic, may be incomplete or maintained in aggregated form due to historical recordkeeping practices (including records originating with predecessor entities subsequently acquired by the Company).

Due to these limitations, the Company does not maintain a single consolidated catalog that contains all data fields requested in this Data Request for all plastic pipelines and plastic components across the distribution system. The Company has nonetheless reviewed its available records and is providing the most complete compilation of responsive information currently maintained in a reportable format.

Specifically, the Company’s Distribution Integrity Management Program (“DIMP”) and the Company’s recent Major Modification to its Long-Term Infrastructure Improvement Plan, which was filed on December 11, 2025 at Docket No. P-2022-3034957 (“LTIIIP”), contain data tables that identify plastic pipeline materials and plastic components present in the Company’s system by vintage and material type, including information regarding first-generation plastic materials.

These data tables are attached hereto as **Confidential Exhibit NFG-DR-1** and **Exhibit NFG-DR-2** and constitute the Company’s response to Request No. 1.

**Sponsor: Kyle Witchcoff  
Engineering Manager**

**Date: January 29, 2026**

**[2] Please In the event that you are unable to provide an accurate catalog as described above, please provide ap plan to identify and catalog the amount and type of plastic components within your distribution system, and also provide an explanation of how your utility will differentiate between older, at-risk plastic components and newer ones in your DIMP, and Commission-approved LTIP if you have one?**

**RESPONSE:** The Company takes seriously the Commission's directive to identify, evaluate, and manage plastic pipeline materials within its distribution system, particularly older or legacy facilities. The Company's approach to identifying and cataloging plastic mains, and to distinguish between older, potentially higher-risk plastic and newer installations, is governed by its DIMP and implemented in the normal course of the Company's activities.

As part of this approach, the Company categorizes plastic pipeline materials based on available records (material type and vintage) and continuously refines this information through reviews conducted in the normal course of the Company's activities, field investigations, and construction activities which allows legacy or unknown-vintage plastic to be identified and records to be updated.

This approach has resulted in a meaningful reduction in the amount of plastic pipeline of unknown vintage and/or material on the Company's system in recent years and continues to inform updates to the Company's asset records and risk assessments.

The Company's current strategy of identifying and addressing older or at-risk plastic facilities is further reflected in a proposed major modification to its LTIP, filed on December 11, 2025 at Commission Docket No. P-2022-3034957 and currently pending Commission approval. That filing describes the Company's methodology for identifying, prioritizing, and replacing plastic pipeline materials consistent with integrity-based risk management principles.

Notwithstanding these efforts, the Company's prioritization of replacement activities remains guided by its DIMP and associated risk model, which incorporates federally required integrity management criteria. Under this framework, plastic pipeline materials are evaluated alongside other risk drivers, and replacement priorities are determined based on overall system risk rather than material type alone.

The Company will continue to refine its cataloging and evaluation of plastic pipeline materials as additional data becomes available through ongoing operations, record validation efforts, and construction activities. At present, however, the Company's plan remains to follow the parameters and prioritization established under its DIMP, consistent with applicable federal and state requirements.

**Sponsor: Kyle Witchcoff  
Engineering Manager**

**Date: January 29, 2026**

**[CONFIDENTIAL EXHIBIT NFG-DR-1 OMITTED  
FROM THE PUBLIC VERSION OF THIS FILING]**

Exhibit NFG-DR-2

FROM NATIONAL FUEL'S PETITION FOR  
MAJOR MODIFICATION TO LTIIP FILING MADE ON DEC 11, 2025 ("Petition")  
AT DOCKET NO. P-2022-3034957

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
<b>Total</b>	<b>3290.4</b>

As noted in the proposed Amended Long Term Infrastructure Improvement Plan, affixed to the Petition at p. 15:

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.

**VERIFICATION**

I, **Kyle Witchcoff**, certify that I am an Engineering Manager for National Fuel Gas Distribution Corporation, and that in this capacity I am authorized to, and do make this Verification on its behalf, that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 1/29/26

Signed by:  
*Kyle Witchcoff*  
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**Kyle Witchcoff**  
Engineering Manager