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VIA E-FILING

January 30, 2026

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: TUS Data Request Addressed to Public Utilities Distributing Natural Gas Concerning Plastic Pipe Data – 2025
Docket No. M-2024-3050313

On September 11, 2025, the Pennsylvania Public Utility Commission ("Commission") entered an Order at Docket No. M-2024-3050313 directing the Bureau of Technical Utility Services ("TUS") to collect information concerning plastic pipelines and other plastic components used in natural gas distribution systems throughout the Commonwealth. By letter dated December 16, 2025, TUS issued a data request ("Data Request") to all jurisdictional natural gas public utilities pursuant to 66 Pa.C.S. §§ 504 and 1501, seeking information necessary to evaluate the safety, reliability, and condition of plastic components within distribution infrastructure.

Columbia Gas of Pennsylvania ("CPA" or the "Company") submits this response and corresponding enclosures in regarding TUS's Data Request. The within information is based upon currently available records, asset management systems, and engineering documentation. Further, the Company is including the required verification with this response, pursuant to 52 Pa Code § 1.36.

Attachment A reflects information currently available to the Company regarding the number of plastic distribution service lines, categorized by year of installation, from 1965 through the end of calendar year 2024. The Company has not historically tracked the manufacturer of the plastic service lines or information on other plastic service line components. The Company cannot confirm the installation date or the material for the services contained in the "unknown" category of the spreadsheet.

Attachment B reflects information currently available to the Company regarding plastic distribution mains, categorized by year of installation and length of main, through the end of calendar year 2024. The Company has not historically tracked the manufacturer of the plastic distribution main lines or information on other plastic main line components. The Company

cannot confirm the installation date or the material for the main lines contained in the "unknown" category of the spreadsheet.

Where data is not currently available at the level of specificity requested, the Company provides the following explanation and, where applicable, a plan for further identification and cataloging. Broadly, CPA applies multiple methods to identify and catalog the type of plastic components within its distribution system.

CPA tracks information and records related to plastic pipe and components through the use of barcode scanning on new distribution installations. Data collected on plastic using the ASTM F2897 barcode is often done to catalog the amount and type of plastic pipe and components in the system. This information is recorded with the GPS point on new installations. According to GS 2810.024, attributes of facilities should be captured whenever practical. As of 2025, a majority of new installations are recorded through GPS.

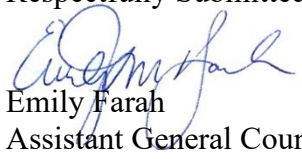
Additionally, CPA tracks information associated with new plastic fusions according to GS 1312.010 Plastic Fusion Documentation.

When legacy plastic pipe is exposed through routine work, CPA collects data on it using the Pipe Exposure form within CPA's GIS mapping platform, pursuant to the Company's Gas Standards. This form helps locate and document legacy plastic pipe through the collection of pipe color. Certain colors of plastic can be assumed to be older at-risk plastic.

Regarding how the Company differentiates between older plastic and newer plastic pipe and components, CPA provides the following. DIMP uses a probabilistic risk assessment ("PRA") to assess risk in the distribution system. In the PRA, older at-risk plastic pipe and components are differentiated from newer ones through the application of different Frequency of Failure ("FOF") factors. Older at-risk plastic that was manufactured prior to 1982 will receive a higher FOF factor based on the recorded installation date whereas newer plastic will receive lower FOF factors. If a plastic pipe segment does not have an installation date, but has a recorded pipe color that correlates to first generation plastic, the risk score of that segment and its associated components is calculated with a higher FOF by assuming that the segment contains older at-risk plastic. Assigning higher FOF factors to the older, at-risk pipe and components is an effective way to ensure that a higher risk score is assigned to at-risk plastic.

Please contact the undersigned with questions, comments, or concerns.

Respectfully Submitted,



Emily Farah
Assistant General Counsel

Enclosures

CPA Plastic Services

*From GIS snapshot taken 1/3/2025, using the attibutes of only the "Main-to-PropertyLine" segment

Year Installed	# Services
1965	153
1966	190
1967	224
1968	447
1969	989
1970	1320
1971	2006
1972	1951
1973	1185
1974	957
1975	1115
1976	1213
1977	2640
1978	2276
1979	4344
1980	5361
1981	4316
1982	3877
1983	3683
1984	4347
1985	4439
1986	5021
1987	5366
1988	6220
1989	5895
1990	5826
1991	5310
1992	5922
1993	5997
1994	6593
1995	6103
1996	5827
1997	6349
1998	6359
1999	6184
2000	5683
2001	5945
2002	5484
2003	5582
2004	6088

Attachment A - CPA Plastic Services

2005	6439
2006	5815
2007	6433
2008	8123
2009	5394
2010	5692
2011	8631
2012	9466
2013	10829
2014	10244
2015	9585
2016	11123
2017	11640
2018	11669
2019	12046
2020	12143
2021	11508
2022	12006
2023	12105
2024	10526
Unknown	2652
[redacted]	[redacted]
TOTAL	352856

Attachment B - CPA Plastic Distribution Mains

Row Labels	Sum of Measured Length (FT)
1965	587
1966	1,868
1967	41,305
1968	125,947
1969	221,363
1970	235,098
1971	204,506
1972	120,474
1973	94,989
1974	79,540
1975	98,767
1976	80,299
1977	180,958
1978	215,897
1979	289,459
1980	397,410
1981	404,716
1982	302,298
1983	338,675
1984	359,014
1985	370,102
1986	481,758
1987	527,561
1988	558,248
1989	527,141
1990	463,256
1991	389,157
1992	390,137
1993	461,981
1994	605,436
1995	507,137
1996	412,536
1997	530,061
1998	550,786
1999	491,472
2000	446,251
2001	456,842
2002	395,103
2003	352,640
2004	491,438
2005	542,112
2006	630,912
2007	606,952
2008	715,649
2009	449,713
2010	452,877

Attachment B - CPA Plastic Distribution Mains

2011	647,553
2012	700,943
2013	797,898
2014	748,287
2015	775,033
2016	865,513
2017	930,268
2018	863,769
2019	1,002,553
2020	921,819
2021	799,859
2022	803,561
2023	945,593
2024	803,858
2025	2,564
Unknown	325,174
Grand Total	**28,534,674**

VERIFICATION

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

Date: January 30, 2026

Kenneth S. Phillian
Principal Engineer
Columbia Gas of Pennsylvania, Inc.