

Ribeka S. Danhires
Manager
Rates & Regulatory Service



121 Champion Way Suite 100
Canonsburg PA 15317
Cell: 614.531.3511
rdanhires@nisource.com

February 26, 2026

VIA ELECTRONIC FILING

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

**Re: Columbia Gas of Pennsylvania, Inc.
2026 Annual Asset Optimization Plan**

Dear Mr. Homsher:

Enclosed for filing on behalf of Columbia Gas of Pennsylvania, Inc. (“Columbia”) is the 2026 Annual Asset Optimization Plan, filed in accordance with the requirements at 66 Pa. Code §1356 and Columbia’s Long Term Infrastructure Improvement Plan approved by the Pennsylvania Public Utility Commission at Docket No. P-2022-3037388 for the 5-year period January 1, 2023 through December 31, 2027. Also included in this filing is the 2025 Spending Information to supplement the information provided in the 2026 AAOP, in accordance with the directive of the March 12, 2021 Secretarial Letter issued in Docket No. M-2021-3024278. Copies will be provided as indicated on the Certificate of Service.

Very truly yours,

A handwritten signature in blue ink that reads "Ribeka S. Danhires".

Ribeka S. Danhires

Enclosures
cc: Certificate of Service

CERTIFICATE OF SERVICE

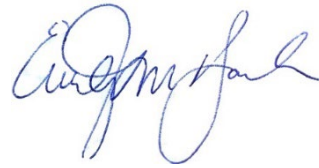
I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of §1.54 (relating to service by a participant).

VIA EMAIL

Allison Kaster, Esq.
Bureau of Investigation
and Enforcement
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

NazAarah Sabree
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
Ra-sba@pa.gov

Darryl A. Lawrence, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
dlawrence@paoca.org



Dated: February 26, 2026

Emily M. Farah
Assistant General Counsel

Columbia Gas of Pennsylvania, Inc.
2023-2027 Long-Term Infrastructure Improvement Plan
2026 Annual Asset Optimization Plan

Introduction:

The Pennsylvania Public Utility Commission (“Commission”) approved Columbia Gas of Pennsylvania, Inc.’s (“Columbia” or “the Company”) 2023-2027 Long Term Infrastructure Improvement Plan (“LTIIIP”) by Order entered April 20, 2023 at Docket No. P-2022-3037388. Previously, in Docket Nos. P-2017-2602917 and P-2012-2338282¹, the Commission approved Columbia’s Second LTIIIP and Initial LTIIIP, respectively. In accordance with the requirements at 66 Pa. Code §1356, a utility with an approved DSIC and LTIIIP must file an Annual Asset Optimization Plan (“AAOP”). The AAOP elements are prescribed as follows: (1) a description that specifies all eligible property repaired, improved and replaced in the immediately preceding 12-month period pursuant to the utility’s LTIIIP and prior year’s asset optimization plan, and (2) a detailed description of all the facilities to be improved in the upcoming 12-month period.

Description of Columbia’s Existing Distribution System:

The Company owns and operates a natural gas distribution system, furnishes natural gas service to end use customers, and is a Natural Gas Distribution Company (“NGDC”) as defined in Section 2202 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §2202. Currently, Columbia serves more than 448,000 residential, commercial, and industrial customers in portions of 26 counties throughout its greater York and Western Pennsylvania service territories. Based on preliminary figures for Columbia’s 2025 Annual Department of Transportation (“DOT”) report, Columbia provides that service through approximately 7,770 miles of distribution main (the 2025 transmission main update is currently not yet available), that it owns operates, and maintains. along with approximately 448,161 services. These facilities (as of January 1, 2026 – again, based on preliminary data) are composed of approximately 681 miles of bare steel, 22 miles of cathodically protected bare steel, 26 miles of wrought iron mains and 28,693 bare steel services.² The balance of the system is comprised of coated cathodically protected steel, or plastic (polyethylene) mains and services, and approximately 19 miles classified as other. As of December 2022, Columbia has eliminated all known cast iron piping within its distribution system.

¹ In Docket No. P-2012-2338282, the Commission also approved the addition of a Distribution System Improvement Charge Rider to Columbia’s tariff.

² The terms “bare steel,” “unprotected coated steel,” “unprotected steel,” and “wrought iron” are used interchangeably and all refer to steel pipe without cathodic protection that is susceptible to corrosion.

In 2007, Columbia began to accelerate the replacement rate of bare steel and cast iron pipe on its system. Between 2007 and 2026, Columbia has retired, or projects to retire, the following footages of bare steel, wrought iron, and cast iron by year:

2007	355,764 feet
2008	528,567 feet
2009	344,488 feet
2010	322,583 feet
2011	553,765 feet
2012	415,240 feet
2013	452,636 feet
2014	413,667 feet
2015	496,610 feet
2016	478,790 feet
2017	509,428 feet
2018	302,606 feet
2019	516,689 feet
2020	387,821 feet
2021	440,036 feet
2022	433,930 feet
2023	482,076 feet
2024	436,830 feet
2025	292,944 feet
2026	271,392 feet(projected) ³

Total Actual (Through YE 2025) 8,164,470 feet

**Please note, some historical footages have been updated to reflect Columbia’s system of record which may differ from previously filed AAOP filings.*

By contrast, between 2002 and 2005 Columbia retired the following footages of bare steel or cast iron by year:

2002	232,320 feet ⁴
2003	179,520 feet
2004	201,712 feet
2005	174,240 feet
4 Year Total	787,792 feet

³ This estimate is based on historic spend and footages achieved. As explained in Columbia’s LTIIP, the projection is subject to change based on emerging conditions.

⁴ This is based on using the 2000 bare steel and cast iron footages rather than the 2001 footages, because in 2001 the DOT reports actually show an increase in the amount of bare steel and cast iron in the system. Since bare steel and cast iron pipe was not added to the system, we believe this is an anomaly in the data.

It is important to note that the above-stated numbers represent only the bare steel, cast iron and wrought iron pipe that has been replaced since Columbia has focused on that pipe in order to optimize its capital to reduce the most risk on the Company's overall distribution system. Columbia's current LTIIP includes not only bare steel and wrought iron as eligible property, but now also includes pre-71 coated steel and pre-82 plastic.

Columbia's total pipe replacement numbers for the purposes of its LTIIP and this AAOP also include other categories of replacement such as mandatory relocation projects, replacement of post-1981 plastic pipe (if in need of replacement), post-1970 coated steel, along with betterment projects. These figures underscore the scope of Columbia's accelerated replacement program, as over the last 19 years (including 2025) the Company will have eliminated an average of 429,709 feet per year, compared to an average annual rate of 196,948 feet in the four (4) years from 2002 to 2005. This constitutes an increase in the annual retirement rate of cast iron, bare steel and wrought iron by a factor of 2.18 times that of the earlier period.

As described in Columbia's LTIIP, DSIC eligible property includes more than bare steel, wrought iron, pre-71 coated steel and pre-82 plastic in that it includes all types of piping, service lines, excess flow valves, regulators, risers, meter bars and meters that must be replaced in order to repair, improve or replace eligible property that is part of the utility's distribution system, as well as unreimbursed costs related to highway relocation projects where a natural gas company must relocate its facilities. Excess flow valves, regulators, risers, and meter bars are replaced in concert with service line replacements but are identified as separate units of property. Additionally, the Company elected not to include the cost of meters in the DSIC, due to the absence of separate identification of meters purchased as replacements versus meters purchased for new business. The Company has established a mechanism to identify the costs associated with meters replaced in association with the infrastructure improvement program and such costs have been reflected in the calculated DSIC rates. The following data, therefore, reports on all types of pipe and service lines replaced.

Property Repaired, Improved and Replaced during the Twelve Months Ended December 31, 2025:

Table 1

CPA

Material	Footage	Miles
Bare Steel	277,021	52.47
Coated Steel - Post 1970	27,893	5.28
First Gen Plastic - Includes Pre-82 Plastic and Unknown Install Year Plastic	71,499	13.54
Other	453	0.09
Plastic - Post 1981	119,054	22.55
Pre-71 Coated Steel - Inclusive of Unknown Install Year Coated Steel	120,497	22.82
Wrought Iron	15,470	2.93
Total	631,887	119.68

2025 Infrastructure Project Replacement Summary

The document historically provided as Attachment A—the prior year’s Infrastructure Project Replacement Summary (2025) — is no longer available due to Columbia’s transition from the Work Management System (WMS) to SAP. Columbia implemented a new work management technology system in July 2025 and is in the process of validating the requisite data. As a result, Table 1, shown above, now reflects data generated from Columbia’s GIS system. Moving forward, Attachment A will consist of the Infrastructure Replacement Summary proposed for the current year (2026), as described further below.

There were 5,463 service lines replaced in 2025.

Columbia owns and reflects in its property records and rate base a customer service line for each customer premises. Columbia’s total customer service lines as of December 31, 2025 are 448,161. Due to 66 Pa.C.S. § 1510, in the Eastern portion of the Company’s service territory, Columbia owns the entire service line, extending from the distribution main to the service site. In the Western portion of Columbia’s service territory, the customer owns the portion of the service line that lies within the customer’s property, and the Company owns that portion of the service line that extends from the distribution main

to the curb valve or to the customer’s property line if there is no curb valve. The count of service lines replaced stated above includes all of the Company service lines replaced, whether the full service line or the portion of the line linking the customer-owned service line to the distribution main. In addition, the Commission has authorized Columbia to replace, but not own, the customer-owned portion of services in the Western portion of its service territory as part of the Company’s accelerated main replacement program. The cost of those replacements is booked as part of the cost of main replacements.

Property Projected to be Repaired, Improved and Replaced during the Twelve Months Ended December 31, 2026:

Pipe:	675,000 feet projected
Service Lines:	7,500 – 9,500 projected
Meters:	1,800 – 3,800 projected

2026 Projected Infrastructure Project Replacement Summary

The list of projected 2026 infrastructure replacement projects, included as Attachment A, is a dynamic roster that is subject to modification based on emerging conditions. The roster will be supplemented throughout the calendar year to reflect the continued assessment of system conditions.

Columbia’s capital prioritization process for replacement projects generally addresses the highest risks identified in the Company’s Distribution Integrity Management Plan (“DIMP”) and is designed systematically to eliminate those risks on a priority basis. Capital replacement projects are developed and prioritized based on the following top risks:

- External Corrosion on Bare Unprotected Steel Mains
- First Generation Plastic

External Corrosion on Bare Steel Unprotected Services and Incorrect Operations/Construction of Plastic Service Risers are other top risks addressed with infrastructure replacement but are not developed into a project. Rather these are replaced once leaks are discovered via leak surveys or when the connecting main is replaced.

Capital replacement projects are prioritized by the Company’s engineering team with input from the operations team. Prioritization is based on multiple factors, including type of risk, leak & operations history, pipe size & material, operating pressure, and population density. The engineering team previously used Optimain DS®, a software

solution, to help assess risk and prioritize capital replacement projects. The engineering team has transitioned to a new program, and now uses Synergi MRP. The Company's process retains some fluidity in order to ensure that unforeseen higher risk projects that may be identified during the year may be addressed appropriately. Consequently, sometimes the list of Columbia's planned projects may be modified during the year, or other higher priority projects are added to the roster of projects for any given year. These modifications and additions account for differences between the projected annual replacement footage and the total of projects shown below. Additionally, mandatory replacements, non-reparable leakage and active and atmospheric corrosion continue to drive replacement of segments of pipe that will impact the ultimate timing of the completion of projects in the LTIIP.

Summary:

Since 2007, Columbia has embarked on a long-term initiative to replace its aging infrastructure in its distribution system to ensure the provision of safe and reliable service throughout its territory in a manner that will optimize available capital and direct it to the most critical projects. This AAOP describes all eligible property repaired, improved and replaced in the immediately preceding 12-month period pursuant to the Company's LTIIP and provides a detailed description of all the facilities Columbia plans to improve in the upcoming 12-month period. Columbia's planning, capital allocation prioritization, and construction programs are dynamic and continually updated to deploy resources in such a way that the safety of Columbia's customers, employees and the communities it serves, remains the foremost consideration. As such, this AAOP provides a snapshot of Columbia's proposed property to be repaired, improved and replaced during the Twelve Months Ended December 31, 2026 based on the best available information at the time of this AAOP. Columbia will continue to optimize this AAOP by adding or modifying projects to ensure continued consistency with the goals of Columbia's LTIIP and its DIMP.

ATTACHMENT A

Columbia Gas of Pennsylvania
2026 Infrastructure Project Replacement Summary
Attachment A

Project Name	Install Footage
SR 219 & OWENS WAY	2,648
PINE CONE REPLACEMENT	3,800
FAIRVIEW PHASE I	4,120
CHESTNUT ST REPL - ST PETERSBURG	2,017
D-22 - CEMETERY RD	12,475
RIVER AVE AND BLUFF AVE	2,357
BIG BEAR LN - D-5191	1,380
CLYMER PHASE 6 REPLACEMENT	1,140
SR 38 KAHLE LAKE REPLACEMENT	4,796
TURKEY RUN - ALUM ROCK REPLACEMENT	3,203
FORT LOUDON PHASE 4	5,441
PLUM SOCK RD REPLACEMENT	760
LONE PINE RD REPLACEMENT	701
2221 - CARNIVAL - REPL JO	400
2221 - DUKE - REPL JO	337
16TH AVE REPLACEMENT	328
NOBLESTOWN LP	5,267
MARIANNA LP - PHASE 1	6,686
GREEN STREET REPLACEMENT	6,900
ARNOLD AVE REPLACEMENT	312
GRANT ST REPL	6,556
FAYETTE STREET PH1	7,153
MAPLE NORTH REPLACEMENT PROJECT	5,950
MAPLE SOUTH REPLACEMENT PROJECT	6,930
HIGH AND GEORGE	3,406
ADAMS AND LEONARD	2,000
FORT LOUDON PHASE 4	2,690
SHANKS CHURCH ROAD	3,500
CLOVER AND MAPLE	2,500
PLEASANTVIEW	2,500
CARLISLE PIKE - REPL	4,850
GETTYSBURG HP TO MP	16,763
DILLER RD	14,825
S MAIN - SHREWSBURY	6,150
POTATO	5,626
LOCUST ST ABBOTTSTOWN	3,766
BRIARWOOD ALDYL-A	5,460
OLD MILL INN RD	2,300
DERRY AND SOUTH REPLACEMENT	2,388
HILLS DR	780
2421 - WESTWIND - REPL JO	9,120

Columbia Gas of Pennsylvania
2026 Infrastructure Project Replacement Summary
Attachment A

Project Name	Install Footage
N ATHERTON ST	4,646
SCOTT RD	2,805
LOGAN RD	5,652
CASTLE SHANNON PH 1	4,735
HOMEHURST REPLACEMENT	5,130
WILSON REPLACEMENT PROJECT PHASE 1	3,590
KIRALFY REPLACEMENT	2,560
BEAGLE PH 2 REPLACEMENT	3,772
2221 - HAMPSHIRE - REPL JO	2,516
PLAINVIEW-STETSON TRUNK LINE	2,891
LIBRARY ROAD REPLACEMENT PROJECT	4,780
BROOKSIDE PHASE 1	5,145
OVERBROOK PHASE 3 ALMONT	2,325
WILSON REPLACEMENT PROJECT PHASE 1	1,365
BENWOOD AVE LP REPLACEMENT	2,580
STROMBERG ST R-10 ABANDONMENT	1,550
2221 - MONTPELIER - REPL JO	1,083
PROVOST RD PH 3 REPLACEMENT	4,995
CASTLE SHANNON PH 1	200
SHIRAS REPLACEMENT- BEECHVIEW PH3	3,100
2221 - ELWYN - REPL JO	1,075
SOUTHSIDE (MURIEL & BINGHAM)	5,075
CS/BOCKSTOCE 35# TRUNKLINE/STATION	2,579
HAMILTON PHASE 2 AMRP	6,355
COUNTRY CLUB REPLACEMENT PROJECT	8,371
CLIFF MINE RD REPLACEMENT	3,700
DEEMER AVE R-4126 OUTLET REPLACEMENT	324
EMSWORTH MP EXPANSION PH 2	5,000
RIVER RD REPLACEMENT - ELLWOOD	3,000
WELLESLEY AV	3,300
WINTER AV REPLACEMENT NEW CASTLE	3,525
PRINCETON & COPPER RD REPLACEMENT	11,300
OLD PRINCETON RD & HOOVER REPLACEMENT	9,052
FAIRCHANCE SOUTH	14,775
POINT MARION LP TO MP	500
ROBBINS STATION ROAD	15,251
FREDERICKTOWN SOUTH	19,930
DUNBAR MP & LP REPLACEMENT	13,495
2321 - MAPLE - REPL JO	13,438
BERLIN LP REPLACEMENT	12,922
2321 - SHORTCUT - REPL JO	9,785

Columbia Gas of Pennsylvania
2026 Infrastructure Project Replacement Summary
Attachment A

Project Name	Install Footage
COFFEY ST LP TO MP	9,120
CRAIG ST REPL	6,811
2321 - DONORA EAST - REPL JO	4,730
2321 - DONORA EAST - REPL JO	6,570
ROLLING HILLS DRIVE LP TO MP	9,520
FELLSBURG PHASE 2 REPLACEMENT PROJECT	17,010
FRONT RIVER ROAD REPLACEMENT	2,307
TC REDI-MIX REPLACEMENT	2,432
CHESTER AVE REPLACEMENT	3,240
BECKFORD REPLACEMENT PROJECT	5,405
D-75 OHIO RIVER BLVD	4,450
MEADE AVE PHASE 1	3,025
LANG ROAD REPLACEMENT	10,000
JOHNSON ALLEY BVR FALLS MP EXPAN	6,027
OCEANS AVE PROJECT	1,480
OLD RT 18 REPLACEMENT	8,425
PHYLLIS DRIVE REPLACEMENT	4,233
JOHN & OAK REPLACEMENT	1,689
HANNA STREET REPLACEMENT	1,375
ROOSEVELT RD EXPOSURE	2,364
N LEE AVE REPLACEMENT	1,925
CAMP MEETING EXT REPL	720
STICKLE RD REPLACEMENT	1,250
LOCUST ST NEW GALILEE	1,210
ELIZABETH ST REPLACEMENT	910
NORTHVIEW AVE REPLACEMENT	760
FAIRMONT AVE REPLACEMENT	760
D-4227-RT 6 CROSSING REPLACEMENT	800
KNOX PHASE III	3,460
PLEASANTVIEW DR REPLACEMENT	7,000
NORTH AND SIXTH	8,104
2421 - BEELER - REPL JO	6,542
E COLLEGE AVE	5,500
MARKET ST - HALLAM	4,940
NORTH SECOND ST RESURFACING	1,500
REGENTS GLEN	875
CARLISLE AND SUNSET	950
HANOVER ARBORETUM	700
LANDIS DR	4,410
2421 - WATERWORKS - REPL JO	1,700
2421 - COUNTRY CLUB - REPL JO	2,000

Columbia Gas of Pennsylvania
2026 Infrastructure Project Replacement Summary
Attachment A

Project Name	Install Footage
2421 - ST PAUL - REPL JO	1,539
2421 - CHARLES - REPL JO	1,150
2421 - MANCHESTER - REPL JO	538
ROCKY MOUNTAIN RD	5,280
LINDY RD	4,050
2421 - DAIRYLAND - REPL JO	2,310
COAST TRUNKLINE	2,730
CHURCHVIEW HP PHASE 1 REPLACEMENT	5,305
BAUSMAN TRUNK LINE	1,658
FALLOWFIELD REPLACEMENT	1,800
2231 - MERCER - REPL JO	3,934
SMOCK LP TO MP	14,260
2321 - ACADEMY - REPL JO	8,013
13TH ST AMBRIDGE	3,484
CLINTON RD REPLACEMENT	1,550
SHADE AV REPLACEMENT	3,287
WINSLOW REPLACEMENT PROJECT	2,670
J&L NORTH REG REPLACEMENT	50
2231 - PINE RUN D1680 REPL JO	4,366
SR 65 & FREW RD REPLACEMENT	3,157
S MAIN ST REPLACEMENT BESSEMER	480
SHENANGO RD (D-88) ACTIVE CORROSION	4,000
GRISWOLD ACRES REPLACEMENT	2,670
Hart St (Houston) - Houston	7,000
WASHINGTON RD (CAMP LN) REPLACEMENT	3,700
ANC - MAGIC ELM SKATELAND - HANOVER	1,600

Attachment 1
Data Request
Columbia Gas of Pennsylvania, Inc.
Annual Asset Optimization Plan
Docket No. M-2021-3024278

Columbia Gas of Pennsylvania, Inc.
2025 Spending Information
Annual Asset Optimization Plan (“AAOP”)

- 1) Please use the format provided below to provide the amounts of infrastructure spending:

	Planned LTIP Expenditures (\$ Million)	Actual LTIP Expenditures (\$ Million)
2025	344.0	352.4

VERIFICATION

I, Ribeka S. Danhires, Manager of Rates & Regulatory Service 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: February 26, 2026



Ribeka S. Danhires
Ribeka S. Danhires
Manager of Rates & Regulatory Service
Columbia Gas of Pennsylvania, Inc.