Sustainability Accounting Standards Board (SASB) 2021

SASB Code	SASB Title	Disclosure Title	Response
IF-GU-420a.2	End-Use Efficiency	Customer gas savings from efficiency measures by market	ONE Gas energy efficiency rebate programs serve residential and commercial customers throughout Oklahoma and parts of Texas by educating customers and encouraging investments in energy efficient appliances that result in reduced net energy consumption and lower utility bills. In 2021, the Oklahoma Natural Gas Energy Efficiency program achieved site savings of 471,104 MMBtu, the Texas Gas Service Central Texas Energy Efficiency Program achieved site savings of 36,367 MMBtu, and the Rio Grande Valley Energy Efficiency Program achieved site savings of 11,922 MMBtu. The City of Austin franchise agreement mandates an energy efficiency program. The other programs throughout Oklahoma and Texas are encouraged by our regulators and have been voluntarily implemented by the company. For more information on energy efficiency, please see the SASB Addendum and 2022 ONE Gas ESG Report.
IF-GU-540a.1	Integrity of Gas Delivery Infrastructure	Number of (1) reportable pipeline incidents, (2) Corrective Action Orders (CAO), and (3) Notices of Probable Violation (NOPV)	(1) 0 (2) 0 (3) see the SASB Addendum
IF-GU-540a.2	Integrity of Gas Delivery Infrastructure	Percentage of distribution pipeline that is (1) cast and/or wrought iron and (2) unprotected steel	0.00% of natural gas pipelines are cast iron 0.039% of natural gas pipelines are wrought iron 3.70% of natural gas pipelines are unprotected steel Approximately 90% of replaced pipe is replaced with PE pipe and 10% with coated, protected steel pipe
IF-GU-540a.3	Integrity of Gas Delivery Infrastructure	Percentage of gas (1) transmission and (2) distribution pipelines inspected	(1) ONE Gas completed inspections on 10.54% of our transmission pipelines. We used the following methods: In-Line Inspection method on 0.60% of transmission pipeline Pressure Test method on 0.94% of transmission pipeline Direct Assessment method on 9.00% of transmission pipeline ONE Gas performed leak survey on 100% of transmission pipelines. (2) 100% of new distribution pipelines are pressure tested before they are placed in service. ONE Gas performed leak survey on 45.98% of distribution main pipelines.
IF-GU-540a.4	Integrity of Gas Delivery Infrastructure	Description of efforts to manage the integrity of gas delivery infrastructure, including risks related to safety and emissions	Please see the SASB Addendum. For additional information on safety and system integrity, please see the 2022 ONE Gas ESG Report.
IF-GU-000.A	Activity Metric	Number of: (1) residential, (2) commercial, and (3) industrial customers served	For 2021, ONE Gas averaged approximately 2,065,000 residential customers For 2021, ONE Gas averaged approximately 160,000 commercial and industrial customers



SASB Code SASB Title Disclosu		Disclosure Title	Response
IF-GU-000.B	Activity Metric Amount of natural gas delivered to: (1) residential customers, (2) commercial customers, (3) industrial customers, and (4) transferred to a third party		117,758 MMcf to residential customers 37,615 MMcf to commercial and industrial customers 2,521 MMcf to other customers (public authority and wholesale customers) 229,935 MMcf to transport customers
IF-GU-000.C	Activity Metric	Length of gas (1) transmission and (2) distribution pipelines	2,460 miles of transmission pipelines 61,761 miles of distribution pipelines

IF-GU-420a.2 Customer gas savings from energy efficiency measures by market

The following rebate programs are offered in the Oklahoma Natural Gas (ONG), Central Texas (CTX) and Rio Grande Valley (RGV) service territories:

OGS Energy Efficiency Programs									
	Residential New Construction			Commercial					
Program	ONG	СТХ	RGV	ONG	СТХ	RGV	ONG	СТХ	RGV
Range	1		1			✓			
Dryer	1	1	1		✓	✓		1	✓
Water Heater	✓	1	1	✓	✓	✓			
Furnace	✓	1		1	✓		✓		
Backup Generator			1						
Low Income	✓								
Low Income Free Equipment		1	✓						
Energy Star/Home Performance		1							
New Home Program				1					
Multifamily Program*				✓					
Food Service							✓	1	✓
Boilers							✓	1	√
Commercial Custom/Direct Install							✓	✓	√
Water Savings Kits	1	1	1						
Transportation (CNG)*	✓	✓	✓	1			✓	1	√

^{*} The multifamily and transportation programs (ONG only) are not funded through the Energy Efficiency budget.

IF-GU-420a.2 Describe relevant policy mechanisms in place that allow for or incentivize energy efficiency

- >> We are encouraged by the governing bodies in Oklahoma and Texas to offer energy efficiency education and energy efficiency programs to our customers. We design our programs to promote the efficient use of natural gas and the benefits of investing in energy efficient appliances, thereby reducing net energy consumption and lowering utility bills for residential and commercial customers. In Oklahoma, we are governed by the Oklahoma Corporation Commission. In Central Texas, our program is governed by any department or office within a city with delegated authority to review and approve the Conservation and Energy Efficiency budget and conservation adjustment clause (CAC) charge adjustment. In the Rio Grande Valley, our program is governed by the Lower Rio Grande Valley Development Council. In Texas, the programs are currently available to customers who live within participating city limits.
- » By ONG Tariff 1201, the Energy Efficiency rate is a fixed rate per customer that is separate from base rates. It is trued-up once per year within an annual filing that occurs each March. In addition, per Oklahoma Corporation Commission Gas Utility Service Rule Chapter 45 Rule 23-8 Incentives, a maximum incentive of 15% of Net Benefits will be paid for achievement of 100% or greater of the Utility's total annual Net Energy Source savings goal.
- >> For both Oklahoma and Texas, our budgets are funded by our customers in areas where the program is offered by including a volumetric (for Texas commercial customers) or fixed charge on the monthly bill (for all Oklahoma customers and Texas residential customers). Our rebate portfolio is based on industry standard methodologies, such as those prescribed by the California Standard Practice Manual and various state technical reference manuals.

IF-GU-540a.1. Number of (1) reportable pipeline incidents, (2) Corrective Action Orders (CAO), and (3) Notices of Probable Violation (NOPV)

We received NOPVs from state regulatory agencies, most of our which were related to damage prevention. We continue to take action to enhance damage prevention programs and reduce third-party damages, as described below and in the accompanying 2022 ESG Report.

IF-GU-540a.4 Description of efforts to manage the integrity of gas delivery infrastructure, including risks related to safety and emissions

1. Describe efforts to manage the integrity of gas delivery infrastructure

Integrity Management: ONE Gas has in place Distribution Integrity Management and Transmission Integrity Management Programs (DIMP and TIMP) compliant with CFR 192 Subparts O and P to evaluate pipeline risk and implement mitigation strategies. We utilize advanced, hosted risk-modeling software on our transmission assets and a probabilistic risk model for our distribution assets.

Damage Prevention: We leverage data in all areas of our safety and system integrity programs to guide decision-making and improve our processes. ONE Gas implemented a Damage Information Management System (DIMS) in 2019, which is a centralized process and system of record for documenting damage to ONE Gas natural gas pipelines and facilities. ONE Gas also utilizes a Ticket Management System to manage tickets submitted through each state's One Call system so we can make data-driven decisions to improve line locating performance. To mitigate pipeline damage, we are leveraging this system to reduce excavation damage by prioritizing those tickets with the highest probability of damage and proactively connecting with the associated excavators prior to the excavation activity.

Public Awareness: ONE Gas follows the general recommendations of the American Petroleum Institute (API) Recommended Practices (RP)-1173, Public Awareness for Pipeline Operators, and has a Public Awareness Program in place compliant with CFR 192.616. The program defines the requirements for pipeline safety education addressing four audiences: 1) the Affected Public; 2) Local Public Officials; 3) Excavators; and 4) Emergency Officials. As an organization, we are committed to providing safe, reliable, natural gas delivery, and performing our work in a manner that protects the safety of people who live and work near our pipelines. We strive for open dialogue about pipeline safety education with communities and key constituencies in our operating areas.

Pipeline Safety Management System: ONE Gas continues to implement a comprehensive and systematic approach to managing safety called the ONE Gas Safety Management System (OSMS). This safety management system aligns with pipeline safety, which utilizes a Plan-Do-Check-Act cycle to foster continuous improvement. In mid-2019, the American Gas Association (AGA) board asked member companies to voluntarily implement API RP-1173 within three years. ONE Gas was an early and enthusiastic supporter of this industry-wide commitment.

ONE Gas monitors Pipeline and Hazardous Materials Safety Administration (PHMSA) advisories and National Transportation Safety Board (NTSB) investigations and is heavily involved in industry organizations to stay abreast of best practices and industry initiatives, including the AGA, Southern Gas Association (SGA), Gas Technology Institute (GTI), and API. Our engineers work to include best practices and lessons learned in our operations and standards.

Leak Survey: In early 2020, ONE Gas invested in advanced mobile methane leak detection units and began a pilot to test the equipment across various pipe types, locations and surveying conditions. As of 2021, our units are deployed in some operating areas in Oklahoma and Texas, and we are working alongside the Kansas Corporation Commission to implement the technology in Kansas. The mobile units are mounted within vehicles and provide in-depth analysis to create reports that provide locations of potential infrastructure leaks. Compared to traditional walking leak surveys, the advantages include an expanded search footprint, the ability to operate in adverse weather conditions and the potential to survey approximately two times faster. Locating leaks and addressing them more quickly also reduces emissions.

Control Room: ONE Gas has a Control Room Management Plan in compliance with CFR 192.631. The Control Room Management Plan defines the Control Room operation processes for the operating entities of ONE Gas that are subject to pipeline safety Control Room regulations. Any controller working in a Control Room that monitors and controls all or part of the ONE Gas pipeline system through our supervisory control and data acquisition (SCADA) system must follow the requirements of the plan. A written Alarm Management Plan is kept for each control room to provide for effective Controller response to alarms. ONE Gas also has in place a Fatigue Management Plan as part of the Control Room Management Plan.

SCADA: ONE Gas a SCADA system in place in compliance with sections 1, 4, 8, 9, 11.1 and 11.3 of API RP-1165. The ONE Gas SCADA system consists of a primary and backup SCADA server to control and monitor pipelines and facilities. The SCADA system is our link between the control room and the field equipment. Normal operations use the primary server with automatic failover to the backup server.

RADAR: Oklahoma Natural Gas began using Risk Assessment and Damage Reduction (RADAR) technology in major metro areas in 2021 and plans to expand deployment to more locations over the next few years. RADAR pulls data and information from public and internal sources to analyze and prioritize the probability of damage occurring due to excavation activities planned near our pipelines. As higher-risk excavations are identified, select field employees proactively connect with the excavator before the excavation begins to help foster safe digging practices and avoid pipeline damage. The implementation of RADAR is an excellent example of continual efforts to improve our safety performance supporting the OSMS, through its Plan-Do-Check-Act cycle.

1.3 The use of standards, industry best practices, benchmarking and participation in third-party initiatives, which may include, but are not limited to:

1.3.1 The American Gas Association's Peer Review Program

ONE Gas is an active participant in the AGA's voluntary Peer Review Program. Participating companies send natural gas subject matter experts to visit each other's facilities to conduct a week-long, in-depth review of specific areas, including safety culture, technical training, damage prevention and pipeline safety risk management. Peer reviewers observe operations and interview employees and contractors from all parts of the organization. At the end of the week, reviewers identify areas for improvement and best practices for safety and efficiency.

1.3.2 American Petroleum Institute's API Recommended Practices 1170 and 1171

Not applicable. ONE Gas does not currently own or operate underground natural gas storage assets.

1.3.3 Natural Gas Industry Safety Programs

ONE Gas is a member of the One Call (811) programs for each state in which it operates. These programs facilitate the locating of company gas lines before excavation activity and promote safe digging practices. ONE Gas provides additional education and training to promote safe digging practices, through education, training, social media campaigns and customer and excavator communications. ONE Gas is also a member of the Common Ground Alliance, a forum that allows stakeholders to collaborate, share best practices, and promote effective damage prevention practices.

1.3.4 The U.S. Environmental Protection Agency's (EPA) Natural Gas STAR Program

We are a participant in the EPA's Natural Gas STAR and Methane Challenge programs. In 2021, we exceeded our EPA Methane Challenge Program emissions reduction goal for the fifth year in a row. As a founding member of Methane Challenge, we've committed to annually replacing a minimum of 2% of our vintage materials — a target we've exceeded each year since we began the program.

ONE Gas is also a member of Our Nation's Energy Future (ONE Future), which represents more than 50 natural gas companies working together to reduce methane emissions intensity to 1% (or less) across the natural gas value chain. In 2021, ONE Gas submitted data to ONE Future for the first time. ONE Future reported a 2020 methane intensity for the group of 0.424%, well below the 1% target. The distribution sector intensity was 0.118%, beating the goal of 0.225% by 46%. Participating distribution companies represented 40% of the gas delivered in the U.S. in 2020. These numbers demonstrate that the natural gas industry can minimize methane emissions, increase production and throughout, and supply much needed energy to the U.S. and around the globe for years to come.

2. How ONE Gas integrates a culture of safety and emergency preparedness throughout its project lifecycles, such as through training, oversight of workforce, rules and guidelines for communicating risks, and use of technology.

ONE Gas is also an active participant in the voluntary AGA Gas Utility Operations Best Practices Program. Each year, several roundtable topics are selected. Participating companies complete surveys that consist of quantitative and qualitative data for each roundtable topic. After data submission, industry leaders are identified and participating companies can benchmark their performance against peer companies. ONE Gas also participates in the roundtable meetings where best practices are shared and discussed with industry peers.

Safety is our foremost core value and is integrated throughout our culture and processes. As noted above, we have adopted API RP-1173 and are implementing a Safety Management System that also utilizes a Plan-Do-Check-Act cycle to analyze our activities and foster continuous improvement. Our employees are trained and empowered to stop work if they see anything unsafe, or if essential safety equipment is missing. Our pipeline safety compliance group reviews procedure adherence and documentation for compliance with laws and regulations, prompting corrective action plans when needed.

ONE Gas opened a new training center in 2021 that is designed to provide hands-on training to Operations employees throughout the company. The 17,000 square-foot space has dedicated areas for specific disciplines, including pressure and measurement, customer service, construction and maintenance, fire abatement and management and excavation safety. A "Simulation City" includes eight buildings that replicate real-world scenarios our field workers typically face. Hands-on training lets employees experience utility locating, simulated leaks and handling code violations. The training center also includes an inspector school and a dig site for teaching safe digging techniques and best practices for trench shoring. The ONE Gas Training Center held its first training class in June 2021.

In addition to the requirements of our Operator Qualification Plan described in section 3 below, inspection and job site assessments provide workforce oversight. Inspectors utilize technology to verify operator qualification status of workers and record inspection activities. Field employees and contractors have ready access to ONE Gas operating standards. Our field operations and contractor performance teams work with contractors to enforce contractual provisions, check that operating standards and safety requirements are being followed, and provide resources to improve performance. We hold yearly safety summits with contractors to share best practices and reinforce that safety is ONE Gas' number one core value.

3. Describe your approach to ensuring pipeline operators are qualified or supervised when performing a covered task

ONE Gas has a comprehensive operator qualification (OQ) plan, consistent with 49 CFR 192, Subpart N – Qualification of Pipeline Personnel, that defines the requirements and processes used to qualify individuals who perform covered tasks on ONE Gas facilities. ONE Gas recently constructed a state-of-the-art training center and is implementing B31Q to improve the quality and consistency of training and operator qualification for our field workforce. The ONE Gas OQ Plan provides that individuals must be properly qualified to perform covered tasks or, for non-restricted tasks, be directed and observed by a qualified individual. The qualified individual is responsible for task performance and signing any related documentation.

ONE Gas directly supervises and verifies OQ for its own employees and utilizes a third-party service to administer OQ assessment and maintain OQ records for contractors. The OQ record is accessible to inspectors via an e-wallet certification that all contractors are required to have when working on a ONE Gas job site.

4. Describe efforts to mitigate risks and promote emergency preparedness, such as coordinating with third parties (e.g., sewer line and buried power line developers), performing timely pipeline inspections, repairing aging infrastructure, and maintaining current pipeline operator certifications

ONE Gas has in place a Pipeline Emergency Response Plan (PERP) procedure to mitigate risk and promote emergency preparedness for pipeline operations. The PERP requires emergency drills for each operating division and includes local emergency management personnel and public authorities as appropriate. Each year in each division, threat and hazard identification and risk assessment (THIRA) meetings are conducted with company officers and management to plan for drills, including a discussion of areas of improvement and industry examples of natural gas emergencies. We also participate in emergency drills hosted by a wide variety of third-party community partners, agencies, and organizations.

We have in place a Crisis Management Plan, a Business Continuity Plan, and Corporate Security Plan. These plans incorporate crisis or emergency drills on at least an annual basis.

The ONE Gas Operations and Maintenance (O&M) manual contains a procedure with instructions to field operations personnel to develop an isolation plan in preparation for unexpected operating conditions during the completion of a pipeline tie-in. The procedure instructs personnel to "confirm the location, accessibility, and operability of emergency valves, non-emergency valves, and proposed squeeze off locations," along with determining the direction and number of natural gas supply feeds into the area, system pressures, and the schedule and sequence of events necessary to complete the tie-in work.

ONE Gas has in place Distribution Integrity Management and Transmission Integrity Management Programs (DIMP and TIMP) consistent with CFR 192 Subparts O and P to evaluate pipeline risk and implement mitigation strategies. Our Damage Prevention and Public Awareness Programs proactively engage key stakeholders, enable ONE Gas to take steps to avoid damage to our pipelines and are consistent with applicable portions of CFR 192 Subpart L.

In addition to our public awareness efforts and damage prevention programs, ONE Gas provides cross-bore awareness and information about safety measures to plumbing and excavating stakeholders (cross-boring occurs when a gas line intersects another utility's line).

ONE Gas plans its leak surveys to meet federal and state codes. ONE Gas' pipe inventory is predominantly polyethylene (PE) and coated steel (92%). We continue to modernize our system by replacing or cathodically protecting our unprotected steel pipe and replacing other vintage pipe, which improves the safety and integrity of the pipe and reduces emissions

See Section 3 for a discussion of our operator qualification program.

Describe efforts to manage risks related to human health and safety, and emissions, including fugitive emissions and process emissions, that arise out of the integrity of gas delivery infrastructure

Our Pipeline Emergency Response Plan specifically, and O&M plans in general, are developed with a focus to protect life, property, and then company assets, in that order.

ONE Gas is subject to and has fulfilled the requirements of the PIPES Act of 2020, Section 114 which is a self-directed mandate from Congress requiring operators to review and update their O&M manuals to ensure the plans contribute to the public safety, eliminating hazardous leaks and minimizing the releases of natural gas from pipelines, and the protection of the environment.

Our pipeline replacement program has enabled us to lower emissions due to leaks from mains and services. By 2035, we expect to achieve a 55% reduction in emissions due to leaks from our distribution mains and services, measured from a 2005 baseline and accounting for projected system growth. We expect to achieve this goal primarily through our vintage pipeline replacement and protection program. We continue to utilize technology, such as mobile leak detection, to improve leak detection and repair programs and are integrating state-of-the-art advanced leak detection technologies and practices. Faster leak detection and repair reduces emissions from leaks. ONE Gas has also piloted the use of specialized mobile compression and vacuum equipment to capture methane that would otherwise vent or flare during maintenance or inspections and return the gas to the system. For more information, see the accompanying 2022 ESG Report.

6. Specifically address operations in high consequence areas and systems to avoid and manage emergencies, accidents and incidents that could have catastrophic impacts on human health, the local community, and the environment.

ONE Gas assesses transmission pipelines in areas of higher population using internal inspection tools, pressure testing and direct assessment. These assessments help identify pipeline anomalies so ONE Gas can perform remediations in a proactive manner. ONE Gas has been lowering pressure on certain high-pressure pipelines in metropolitan areas since 2008. Operating these pipelines at a lower pressure significantly increases safety by eliminating the risk of a pipeline rupture. Over the past 13 years, ONE Gas has reduced pressure on more than 1200 miles of transmission pipeline. Additionally, since 2020, ONE Gas has been enhancing its emergency valve systems to minimize emergency response time and maximize reliability by limiting outage impact to our customers when a line needs to be shut off. Engineering and Operations utilize modeling software and a sectionalized boundary grid system to continually upgrade the pipeline system and optimize shutoff valve locations in system planning.

The ONE Gas Field Operations group takes Pipeline Emergency Response training on an annual basis. OGS employs a Director of Emergency Management that works with Operations leadership to oversee emergency response, preparedness and planning, and relationships with emergency partners (city, county and state level). Additionally, the OGS Director of Emergency Management establishes and maintains designated Points of Contact for state level emergency management personnel. ONE Gas employees practice simulated events — annual tabletop and/or field exercises — for each state. in addition to the emergency preparedness efforts and DIMP and TIMP programs described above, the Asset Management team at ONE Gas focuses on safety, capacity, and reliability planning to enhance system integrity and mitigate risks. Vintage distribution main and service line replacement projects are optimized for risk mitigation by our asset investment planning and management technology.

7. Direct or indirect financial opportunities related to the management of the integrity of the gas delivery infrastructure

In 2021, we invested \$383 million in capital investments for system integrity and replacement projects, a 6% increase over 2020.

8.1 Disclose pipeline replacement rates, use of polyethylene pipes, or other efforts to reduce fugitive emissions and leaks and improve the safety of its distribution pipelines

ONE Gas replaced approximately 430 miles of transmission pipeline, distribution mains, and service lines in 2021. Our pipeline replacement ratio is approximately 90% polyethylene and 10% protected steel. These are generally lower-emitting pipe materials than the vintage materials replaced.

8.2 Average response time for gas emergencies

In February 2021, the U.S. experienced Winter Storm Uri, a historic winter weather event impacting supply, market pricing and demand for natural gas in several states, including our service territories of Oklahoma, Kansas, and Texas. Due to the extreme nature of Winter Storm Uri, our emergency response times were severely and negatively impacted during the period of 2/13/21 to 2/22/21. Response times increased during this period due to weather and road conditions which limited the availability of resources as well as our ability to work and travel safely. Additionally, as a result of power outages, tree damage, and low-to-no pressure situations, we experienced an unprecedented volume of emergency orders. As a result of the impact to our operations during this time, we are reporting emergency response times both inclusive and exclusive of these dates. Excluding calls from Winter Storm Uri, our average response time for gas emergencies in 2021 was 27.6 minutes, with 64.53% of emergencies responded to within 30 minutes. Including calls from Winter Storm Uri, our average response time for gas emergencies in 2021 was 42.35 minutes, with 62.65 % of emergencies responded to within 30 minutes.

8.3 Open Grade 2 and 2+ leaks

When leaks are detected, they are classified as Grade 1, 2 or 3. Grade 1 leaks are existing or probable hazards to persons or property and require immediate repair. ONE Gas procedures currently require that hazardous leaks be repaired immediately and that personnel remain on site until the leak has been repaired. Grade 2 leaks are non-hazardous at the time of detection and require a repair within 6 months of detection to avoid a future hazard. Grade 2 leaks are re-checked at specific intervals if repair cannot be done immediately. Grade 3 leaks do not represent a probable hazard at the time of detection and are reasonably expected to remain non-hazardous. Although regulations do not mandate a repair timeline, ONE Gas protocols require repair within 30 months. On 12/31/2021, ONE Gas had 210 open Grade 2 leaks, which is equivalent to 0.003 Grade 2 leaks per mile of pipeline.



CEO Letter

SASB Addendum

8.4 Fugitive Emissions from distribution system as measured utilizing EPA subpart W factors*

363,124 metric tons CO2e

14,525 metric tons CH4

Fugitive Methane Emissions Rate 0.22%

*ONE Gas has limited transmission assets that do not meet the threshold for EPA reporting and are not included in these numbers

8.5 Process Emissions

We do not currently measure or estimate process emissions. However, ONE Gas has piloted the use of specialized mobile compression and vacuum equipment to capture methane that would otherwise vent or flare during maintenance or inspections and return the gas to the system.

8.6 Other efforts to reduce emissions and/or improve the safety of the gas delivery infrastructure

Please see 2022 ESG Report.

American Gas Association (AGA) Voluntary Reporting Tool

Parent Company ONE Gas, Inc Operating companies
Kansas Gas Service
Oklahoma Natural Gas
Texas Gas Service

Business typeNatural Gas Utility

States of OperationKansas
Oklahoma
Texas

Regulatory Environment

Regulated

Report Date

As of December 31, 2021

Natural Gas Distribution

Natura	i Gas Distribution	Current Year	Last Year					
Ref. #.	Reporting Metric	2021	2020	Definition				
1	Methane emissions and mitigation from distribution mains All methane leak sources per 98.232 (i) (1-6) are included for Distribution. Combustion sources are excluded. CO ₂ is excluded.							
1.1	Number of Gas Distribution Customers	2,220,000	2,241,000					
1.2	Distribution Mains in Service			These metrics should include all local distribution companies (LDCs) held by the Parent Company that are above the LDC Facility reporting threshold for EPA's 40 C.F.R. 98, Subpart W reporting rule.				
1.2.1	Plastic (miles)	22,367	21,936					
1.2.2	Cathodically Protected Steel - Bare & Coated (miles)	17,775	17,758					
1.2.3	Unprotected Steel - Bare & Coated (miles)	1,464	1,491					
1.2.4	Cast Iron / Wrought Iron - without upgrades (miles)	24	24					
1.2.4	Cast from / wrought from - without upgrades (miles)	24	24					

	1.3	Plan/Commitment to Replace / Upgrade Remaining Miles of Distribution Mains (# years to complete) These metrics should provide the number of years remaining to take out of service, replace or upgrade catholdically unprotected steel mains, and cast iron/wrought iron mains, consistent with applicable state utility commission authorizations.					
	1.3.1	Unprotected Steel (Bare & Coated) (# years to complete)	Data not currently available	Data not currently available	Optional: # yrs by pipe type.		
-	1.3.2	Cast Iron / Wrought Iron (# years to complete)	Data not currently available	Data not currently available	ONE Gas has no cast iron pipe and less than 24 miles of wrought iron pipe.		