



Office of the Ohio Consumers' Counsel

Your Residential Utility Consumer Advocate

Janine L. Migden-Ostrander
Consumers' Counsel

March 3, 2009

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2009 MAR -3 PM 4:13
PUCO

Ms. Renee Jenkins, Director
Administration Department
Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, Ohio 43215-3793

Re: In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution Service,
Case No. 08-72-GA-AIR, et. al.

Dear Ms. Jenkins:

The Office of the Ohio Consumers' Counsel ("OCC") files this letter to express support, for Columbia Gas of Ohio, Inc.'s ("COH") recent tariff filing. On February 26, 2009, COH filed tariffs for the establishment of a Low Usage, Low Income Incentive credit of \$4.00 per account per month which is available to a total of 6,000 residential customers each month during the period from April, 2009 through March, 2013.¹ COH established the following eligibility requirements for the Low Usage Low Income Program: 1) the customer must qualify or demonstrate they have qualified for the Home Energy Assistance Program, 2) not be a participant in the Percentage of Income Payment Plan, and 3) *have annual weather-normalized throughput of less than 85 Mcf.*²

Proper establishment of an eligibility limitation is an important consideration for assuring that this program has the potential to reach all deserving customers. Because the straight fixed variable rate design harms those customers at or below the average usage level, the eligibility requirements should begin at the level of average residential customer usage. Based on OCC's understanding that the average residential customer in COH's service territory uses 84 Mcf per year,³ OCC supports the tariffs as filed by COH in these cases.

¹ Revised Tariff Filing at 1 February 26, 2009 superseding tariffs filed on February 19, 2009 (Sixth Revised Sheet No. 16 and Fifth Revised Sheet No. 25).

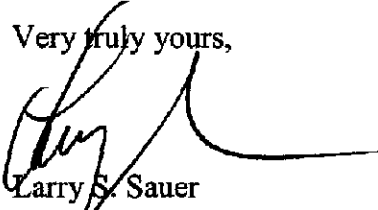
² Id. (Emphasis added).

³ Prepared Direct Testimony of Russell A. Feingold at 46 (March 17, 2008).

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business to technician. Date Processed - MAR 03-2009

Renee Jenkins, Director
March 3, 2009
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Very truly yours,

A handwritten signature in black ink, appearing to read "Larry S. Sauer", with a long horizontal flourish extending to the right.

Larry S. Sauer
Assistant Consumers' Counsel

cc: Paul Duffy, Esq.
Jeanne Kingery, Esq.
Parties of Record